



December 19, 2024

Andrea Martin
Director, Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA)
1 Stone Road West
Guelph, ON N1G4Y2

Dear Andrea,

Re: Proposed Amendments to Regulation 950 to expand the ability to issue tickets

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on proposal to amend Regulation 950 – Proceedings Commenced by Certificate of Offence (Reg. 950) under the *Provincial Offences Act (POA)*. BFO represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

We appreciate the ministry's desire to improve the current risk-based regulatory enforcement approach by having an additional tool to ensure compliance. That being said, based on feedback from our members, we have some concerns and believe more consultation with industry and stakeholders take place prior to considering implementation of the proposed amendments.

There are too many unknowns regarding the range of fines for the offences noted on the proposed list of provisions under current legislation for which a ticket could be issued. Education and awareness should remain as the primary compliance tools when working with industry and more specifics regarding how the ability to issue tickets will fit into the progressive compliance approach. A punitive approach risks eroding trust and cooperation between OMAFA and industry, undermining progress on shared goals.

Existing enforcement mechanisms are sufficient, and adding ticketing could create inefficiencies without clear benefits. Resources should be used to support industry and educate producers instead of being diverted toward ticket management.

We recommend that the ministry pause their compliance modernization - proposed amendments to Regulation 950 to expand the ability to issue tickets and conduct more consultation with industry. This could be achieved with each individual association or collectively during a round table with industry and stakeholders.

Thank you again for the opportunity to comment on the proposed amendments and we welcome the opportunity to discuss in more detail.

Sincerely,

A handwritten signature in black ink that reads "Craig McLaughlin". The signature is written in a cursive style with a large initial 'C'.

Craig McLaughlin
BFO President

Cc: BFO Board of Directors
Dr. Robert Blenkinsop, Manager Protection & Assurance Policy