



October 26, 2020

Ministry of Labour, Training and Skills Development
400 University Avenue, 4th Floor
Toronto, Ontario
M7A 2R9

To whom it may concern,

Re: BFO Submission to the Proposed Amendments to Ontario Regulation 422/17 and Ontario Regulation 421/17 made under the Ontario Immigration Act, 2015

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the proposed amendments to *Ontario Regulation 422/17* and *Ontario Regulation 421/17* made under the *Ontario Immigration Act, 2015*. BFO represents 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.

BFO supports the proposed amendments to introduce an Expression of Interest (EOI) system for the various OINP streams. The amendments will make the application process for Ontario Immigrant Nomination Program (OINP) users more efficient, and efforts to reduce administrative burdens for applicants is always welcomed. With that, BFO would like to take this opportunity to address previous concerns and recommendations with the OINP that were submitted to the Ministry of Economic Development, Job Creation and Trade earlier this year.

The Ontario beef industry continues to experience significant labour shortages in beef cattle processing, which is one of the main factors contributing to the severe processing capacity shortage in Eastern Canada. According to Meat and Poultry Ontario, there is an estimated shortage of 2,400 meat cutters in Ontario. This is equivalent to \$1.2 billion in lost productivity. In addition, a study conducted by Canadian Agriculture Human Resource Council in 2017 concluded there is a 9.7 per cent meat cutter vacancy rate for rural abattoirs compared to the national average of 1.8 per cent. BFO believes that it is important to make amendments that will allow OINP users a pathway to becoming a permanent part of the labour force.

BFO requests that the following recommendations be considered, in addition to the proposed amendments to *Ontario Regulation 422/17* and *Ontario Regulation 421/17*. These recommended amendments would further assist in ensuring meat processing facilities can readily access the OINP.

- Align the educational requirements for the In-Demand Skills Stream with those of the Government of Canada's Agri-Food Immigration Pilot. The Agri-Food Immigration Pilot requires applicants to obtain an educational credential assessment report from a designated organization or professional body, showing completion of a foreign credential at the secondary school level



or above. This requirement allows further flexibility for applicants when applying for permanent residency in comparison to obtaining an educational credential assessment report that proves the applicant's education level is equivalent to a Canadian high school diploma.

- Further streamline and allocate more nominees to labour-demanding sectors in response to extreme labour shortages across the province, especially within rural areas. This will increase access for sectors with immediate demand and reduce the wait times for applicants and employers.

On behalf of BFO, thank you for the opportunity to provide feedback on the proposed amendments to *Ontario Regulation 422/17* and *Ontario Regulation 421/17* under the *Ontario Immigration Act, 2015*. We would be pleased to meet with the Ministry of Labour, Training and Skills Development to further discuss our recommendations on how the OINP can aid in reducing the extreme labour shortages in beef processing in Ontario.

Sincerely,



Rob Lipsett
President

