

October 1, 2013

Christian Farmers Federation of Ontario Comments on Bill 36, Local Food Act

The Christian Farmers Federation of Ontario (CFFO) wishes to thank the committee for considering the comments of our organization on Bill 36, *Local Food Act, 2013*. The Christian Farmers Federation represents over 4,300 farmers across the province of Ontario. The CFFO supports the approach being fostered by the current draft that seeks to encourage education, awareness, and promotion of Ontario-grown food over a regulatory approach, yet we see the opportunity for the *Local Food Act* to do more to help create sustainable local food systems in this province.

Support for Soft Targets

The CFFO is appreciative of the efforts of this Act to take steps to strengthen knowledge and consumption of local food in Ontario. The CFFO supports the soft-target approach to handling public sector institutions. We see this as having multiple benefits.

- First, it avoids the pitfalls of triggering trade disputes over legislated local content. Ontario recently lost its dispute on renewable energy content, so there is little reason to risk a similar misstep in the area of local food. Furthermore, Canadian agriculture is broadly dependent on trade and export opportunity which means that actions that build walls in Ontario could be counter-productive in the long-run for Ontario agriculture and agri-food if it triggers the construction of similar barriers in other jurisdictions.
- Second, a target-based requirement rather than hard regulations on local content and a discussion mechanism for establishing these targets allows for flexibility across public sector institutions. The operating budgets for different public sector institutions can vary dramatically with some being readily able to financially support local food, while others face more severe budgetary constraints.
- Finally the CFFO believes that using discussion-based soft targets is the best method if qualitative decisions enter into play in the setting of targets. For example, requiring high levels of fruits or meats to be part of a local food target for a variety of potentially very good reasons needs to be done in cooperation with impacted stakeholders. The discussion process needs to recognize spending limitations for public institutions, grower costs, and limitations within the local distribution system to arrive at actionable, realistic goals. Idealistic, blind targets serve no one well.

Education

The CFFO notes that the proposed act is a good starting place for improving knowledge and awareness around local food. The CFFO supports a “local food week” as an educational tool. However, having it overlap with agricultural awareness week is a double-edged sword. The danger is that local food week will overshadow agriculture awareness week, reducing knowledge about primary production. However, should the proposed overlap proceed, primary agriculture must take it upon itself to leverage the focus on local food as an opportunity to let residents know where their food comes from.

Other Areas of Support

The CFFO supports the current definition of “Local Food” as being food produced or harvested in Ontario. A more narrow definition would trigger negative regulatory burden for Ontario’s food production and processing system.

Possibilities presented by the *Local Food Act*

The Local Food Act has the potential to provide more for Ontario residents and farmers. The CFFO believes that the *Local Food Act* can serve as a mechanism to enhance other areas of need in Ontario that is related to food in the following ways:

- The CFFO believes that providing tax credits to farmers and food processors for donations to food banks will help facilitate stronger supply procurement for Ontario’s food banks. The CFFO believes that this will be a positive step to supporting low-income families in Ontario.
- The CFFO supports any enhancement of the Foodland Ontario marketing program that can be leveraged from the *Local Food Act*, including expanding its mandate to include the restaurant and food service sectors in Ontario.
- The CFFO believes that the *Local Food Act* can be leveraged to create a market-development program similar to the discontinued Ontario Market Investment Fund. The fund can be used to launch a diverse range of initiatives within the Ontario marketplace that strengthen and grow support for local food by engaging food producing and processing businesses as active partners in local food.
- Finally, the CFFO believes that there is a critical condition that could be addressed by the *Local Food Act*: the lack of coordinated aggregation of fresh fruits and vegetables from family farms. This significant technical barrier to entry into the food supply chain prevents many family farm operations from supplying public institutions.

At the same time, the CFFO recognizes that public institutions do not have the resources to deal with a large number of farmers to source their food supplies, nor are they incented to do so when successful food supply companies exist that can consistently deliver what is needed when it is needed heedless of the source of the food.

Therefore, the *Local Food Act* should mandate support for aggregators of local food supplies from family farm operations because they are needed to bridge the gap between the need for market access by family farms and the need for consistent supply for public institutions.

Thank you for your time and consideration of these remarks from the Christian Farmers Federation of Ontario.

Regards,



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Christian Farmers Federation of Ontario