July 7, 2017

Dear Minister:

On behalf of the Canadian Federation of Independent Business (CFIB) and our 7,200 agri-business members across Canada, I am writing to provide you our farm members’ high priority concerns prior to the federal-provincial-territorial (FPT) agriculture ministers’ meeting to finalize the next agricultural policy framework (NPF).

Canada’s agri-business owners have a clear vision of what they would like to see in the NPF. In our report, *Growing Ag Competitiveness and Innovation*, CFIB urges governments to make sure the NPF addresses the agriculture sector’s competitive challenges and focuses on farmers’ top priorities; red tape reduction (75%), market access & development (46%), research & innovation (44%), business risk management (BRM) (38%), and social licence/public trust (34%) (see Figure 1).

While farmers will identify with many of the priorities planned for the NPF, as outlined in the *Calgary Statement*, they worry their top priority, tackling red tape at the farm-gate, will not get the attention it deserves. Recognizing that concerns about red tape were raised throughout the consultations for the NPF, we believe including regulatory reform would help foster innovation in the sector and ensure farmers are competitive on the world stage.

**Red Tape Stifling Innovation:** Improving the regulatory environment for agri-business owners is a priority for good reason – nearly three-in-four (73%) agri-business owners say red tape holds their
business back from innovating (see Figure 2) (see Agri-business members’ comments in the attached Our Farm Members’ Opinion Survey - Backgrounder).

Focusing on red tape reduction and regulatory reform is a low cost way for governments to drive productivity, innovation, and attract new entrepreneurs to the sector.

While pleased FPT governments recently introduced the Canadian Free Trade Agreement (CFTA), we believe you now have an opportunity to take another step in the right direction by listening to farmers and committing to removing burdensome and outdated regulations.

CFIB therefore recommends making regulatory reform and red tape reduction a priority in the NPF, which would include streamlining regulations and improving government service (e.g. responsiveness and clear language). We would like to see a commitment to measure red tape in the agriculture sector, implement regular tracking and reporting, as well as setting goals for reducing the total burden impacting producers. We commend governments that have taken steps to reduce red tape, including the Manitoba government for becoming the first province to legislate a one-for-one law and encourage other provinces to follow Manitoba’s lead.

We hope agri-business priorities will get the attention they deserve at the upcoming FPT agriculture ministers’ meeting, and also that the NPF will reflect agri-business owners’ views and foster agricultural competitiveness and innovation.

Sincerely,

Marilyn Braun-Pollon
Vice-President, Prairie and Agri-business

Attached: Our Farm Members’ Opinion Survey - Backgrounder
### Canadian agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

<table>
<thead>
<tr>
<th>Issue</th>
<th>% Response</th>
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</thead>
<tbody>
<tr>
<td>Gov’t regs/paper burden</td>
<td>83</td>
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<td>Total tax burden</td>
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<td>Government debt/deficit</td>
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<td>Input costs</td>
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<td>Environmental laws/regulations</td>
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<td>Property rights</td>
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<td>International trade</td>
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<td>Labour legislation</td>
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<td>Transportation costs</td>
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<td>Cost of local government</td>
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<td>Shortage of qualified labour</td>
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<td>Long-term safety net programs</td>
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<td>Succession/retirement planning</td>
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<td>Farm finance</td>
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<td>Other</td>
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Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608.
Our Farm Members’ Opinion Survey – Backgrounder

British Columbia agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

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<thead>
<tr>
<th>Issue</th>
<th>Canada (%)</th>
<th>British Columbia (%)</th>
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<td>Transportation costs</td>
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<td>Long-term safety net programs</td>
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<tr>
<td>Other</td>
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</tbody>
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Red tape holding back innovation; British Columbia agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

Livestock

We are spending time battling useless inspection regulations, while government is allowing essentially uninspected products to enter our market; somehow we are supposed to be able to compete? For example: we are a provincially inspected processor; we sell poultry products to a distributor in Vancouver; that distributor moved the product interprovincial; CFIA has charged us with contravening the meat inspection act! This is a fully inspected product!

Meanwhile, the CFIA have approved imports of poultry products from Hungary based strictly on a document review to determine “equivalency in food safety standards”, but have not confirmed if said food safety standards are being enforced. All they do is inspect the first 10 loads that enter Canada and then spot checks thereafter. If it’s good enough for foreign plants to have this luxury, why isn’t it good enough for Canadians? (BTW – CFIA’s own Manual of Procedures requires them to do on-site reviews of all foreign plants that want access to our markets)
Continued: Red tape holding back innovation; British Columbia agri-business members’ comments

Livestock, continued

New BC Water Act, it’s costing us more to operate as well as making the government way too top heavy! They won’t give us clear answers on what is required and we continue to get mixed messages.

The foreign worker shut down stopped our business from bringing in highly trained food processors, technicians are not available in Canada nor are we able to get training support to train three people for years to raise the level of skills to our standard. Cost $100,000’s in lost sales.

Fruit, Vegetable and Horticulture

We are restricted from bringing certain varieties of trees into BC from elsewhere due to a quarantine, even though our location is subject to the same quarantine, thus no new or better varieties. We should be treated like every other quarantine area so we can move plants as they do.

Workers’ compensation is now so powerful. We need to engineer things that are simple farm equipment.

Ag Services

As a retail store there is a lot of regulation of products such as tracking feed, pesticides and other burdensome paperwork.

It takes a long time to get a license for a new winery and even longer to get a license to grow medical cannabis.

The fertilizer registration process is becoming more expensive, less effective (they got rid of the need to prove efficacy (not good) and kept the need for proof of safety (good) and to meet labeling standards (good) but they have not improved service. It’s still slow and onerous. They keep trying to change their processes to improve speed of registration and it still takes too long to get a new registration or a major label change. By removing the need to prove efficacy (the industry was not asking for this) they removed the remaining important barrier to entry that helped keep out the ‘bad’ players, so they actually have encouraged the cheaters to keep on doing that and because the CFIA doesn’t have staff to enforce much anymore the cheaters can get away with just about anything, yet we still have a slow, cumbersome system. Does this impact innovation? Yes it does. Does it make one think twice about investing capital to improve one’s business? Yes it does.

Food Wholesale and Supply for Agriculture

The time to deal with regulated items.
Our Farm Members’ Opinion Survey – Backgrounder

Alberta agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

<table>
<thead>
<tr>
<th>Issue</th>
<th>Canada</th>
<th>Alberta</th>
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<tbody>
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<td>Long-term safety net programs</td>
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<tr>
<td>Other</td>
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</table>

Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608. Alberta responses: n= 261

Red tape holding back innovation; Alberta agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

Livestock

Time for forms for tracking average production.

The introduction of the new carbon tax will seriously impair almost all agricultural innovation. Innovation and the movement into environmentally friendly usage of such products on any level requires funds which will now be put into tax that will be spent in other countries.

Trying to access the Growing Forward 2 program and the criteria always needs to be adjusted in the wording just to be accepted.
Continued: Red tape holding back innovation; Alberta agri-business members’ comments

Livestock, continued

Expanding our dairy operation. It took two years for approval of the permit. Consequences: The bank we were dealing with withdrew their financial support.

Give dairy farmers the opportunity to sell raw milk. When the carbon tax goes through it will be a disaster.

We have not registered with CFIA because of the amount of red tape involved. Thus our sales are limited to direct to consumer instead of including wholesale.

Bill 6 and the acts it represents have brought considerable uncertainty to what is expected in our operation. Without a clear direction, we run considerable risk of being offside with the rules. Further, it makes any longer term investment more risky; as we don’t know if our industry can thrive in the new work (this comment includes Bill 6, CO2 tax and the looming increase in electricity prices (shutting down coal power for green power).

Government red tape has kept a new slaughter facility from opening in Calgary.

The National Energy Board, and the Alberta Energy Regulators are impacting us in terms of losing carbon sequestering of our soils from disturbance of soil structure, and heat generation from insufficiently burying the pipe under the determined frost line of 2 meters in this area. Also these companies have not fully adopted a proper Biosecurity plan to mitigate any crop or soil born diseases. So far we are only seeing basic Clubroot protocol for canola, and that is not being policed, nor is there a provision for landowners to protect their own lands and crops from evasive weeds, and diseases introduced by these energy companies.

Our business is held back by having all kinds of rules that are more restrictive than our #1 competition our big neighbour the USA and then we try to compete with them and try to sell our products to them and the rest of the world. We can’t be competitive if we don’t have the same tools in our tool box!

The amount of time required getting approvals for manure management and building applications due to NRCB regulations have been a hindrance. The level of excessive and over scrupulous regulations from individuals that don’t understand the true environmental impact, but rather run on perception rather than reality has created a significant slowdown of innovation in building and investing in innovation.

Workers’ Compensation program.

Rules and regulations regarding Milk Tank design. The United States have upright milk tanks which are more efficient to cool and clean, as well as faster to empty (less pumping time for milk trucks). They are not allowed in Alberta as of yet. Rules and regulations regarding new building permits are very slowly processed which hold back efficiency, which in turn delay innovation.

Innovative approaches to water treatment, Carbon tax will apply to natural gas heating and food production and is counterproductive to investment. Some tax applications are actually counter to energy efficiency.

Slow approval process for new chemical registration.

The procedure of permits and time and money involved has made us decide to push back some projects.

Access to the use of foreign labour.

Field Crop

I have applied for a government grant to purchase sectional control for our new air drill back in July. The new drill is coming in January and we still have not heard a thing as to approval or not. This is a $22,000 option to better the environment and may not be viable without the extra assistance. How long does it take? It is so frustrating when they have these programs in place, we apply, and they can’t give us any feedback as to what is going on. The drill will be in my yard before they get their act together.
Continued: Red tape holding back innovation; Alberta agri-business members’ comments

Field Crop, continued

Carbon tax that is looming, the WCB for all farm workers, the overtime that is coming for farm workers, all these things make people scared to spend money which in turn hurts many businesses that live off the agriculture industry.

Provincial mark ups on value-added products are higher than other provinces. Government distribution systems are too expensive. Government grants too difficult to obtain; lack of assistance from government departments. These lower our profit margins and leave us less than we need for marketing/innovation.

Environmental assessment on private property, which is currently cultivated. Any low laying land that has had water in it for a two week period, would be classified a wet land. In this case, a road project between two urban centres is halted because of the recent wet weather. Leaving sloughs that were previously seeded. Under the current legislation, there now needs to be an assessment. In which any land deemed a wet land where the highway goes through now has to be traded. This means that Alberta transportation now has to pay ducks unlimited $17,000/acre to replace the wet land they are about to go through. The problem is, it is on private property which is cultivated. And it isn’t a wet land at all. The project is halted for at least 6 weeks. Which means no work will get finished till spring.

The process to approve new seed varieties and chemicals is far too cumbersome. It needs to be streamlined.

We are very concerned as to how Bill 6 is going to affect our being able to do our work as agriculture is very based on getting good quality products and weather, timing is everything.

Permit process for developing water sources for livestock.

Bill 6 is an extreme example of hindering productivity in family farm operation and progress.

Bill 6, the threat of union infiltrating our relationship with our workforce. Everybody is talking about how to reduce red tape and paperwork and every year we get to do more! This is despicable! The consumer is manipulated by green peace and friends. My biggest fear is that this wave will spread from Western Europe to here and we will lose a bunch of tools in agriculture that will make our life as a farmer a lot more difficult. Farmers are vilified by these groups and there is nothing we as a group can do. We need vocal allies in politics and other industries.

Wanting to set up an irrigation system for some lighter land bought specifically for that purpose. Gaining access over some crown land and rights to draw water from the river has been a long and frustrating process with no positive indication of success at this time. Area of concern is in the province of Manitoba.

Restrictions on letting us clear brush off our land.

Fruit, Vegetable and Horticulture

Cross-provincial trade barriers in the vegetable industry. Poorly thought out government regulation (Bill 6 – Alberta).

We are looking for less red tape, not more.

Carbon tax imposition will increase our cost significantly while our competition in other provinces receives rebates.
Continued: Red tape holding back innovation; Alberta agri-business members’ comments

Ag Services

Length of time it takes to bring new technology to the market.

They are taxing us to death.

The ever changing rules of the NRCB and its slowness.

Slow and not a simple process.

Proposed OHSA rules for farmers have put a damper on their purchasing decisions as they wait to see how these rules are going to impact their farming operations.

Mandatory adoption of already outdated trace-back technologies for livestock.

Registration process for new products.

Manure application regulations and road use for farm equipment.

The overall red tape and regulation is getting too much.

Food Processing

Complications of interprovincial trade, i.e. provincially inspected (meat) processing should be allowed across the Canada. Federally, rules are prohibitive in complexity and cost.

During the building process of the new shop.

With carbon taxing being implemented we are not sure of full impact and therefore withhold upgrades till costs are known!

All the paper work (policies, procedures etc.) that have to be done and approved just to attempt a new product it makes it not worth doing.

Food Wholesale and Supply for Agriculture

As a manufacturer of products which are used to replace antibiotics used in livestock/poultry/aquaculture, the guidelines to have them approved with label claims in Canada through the CFIA takes years, even though the data is supported by peer reviewed data and published (in the highest accredited scientific journals). This process stagnates the science-based companies in Canada. If those companies are only able to market in Canada it is essentially a dead end for them. We are fortunate that we are international in scope and are able to sell our products and technology outside of Canada.

In the municipal government, they charge excessive fees for any development or changes to property or on-farm businesses. The taxes for Ag businesses are the same as for petroleum businesses, e.g. M&E tax. Provincially, the government has no basic knowledge of agriculture and its value structure upon which it is based, which puts fear into any development or ideas we may want to pursue because it requires base line education in the appeal before even getting into the mechanics of your proposal.

Other

Currently, trying to expand into the pet food market. As a Provincial establishment, shipping outside of the province is a very ‘grey’ area, with not much guidance in the area of interprovincial shipment and sales. Even though the sale of pet food is basically unregulated, neither provincial or federal agencies will step up with answers and they both refer to the other agency to help out.
Continued: Red tape holding back innovation; Alberta agri-business members’ comments

Other, continued

It takes a lot of time that can be better spent making innovated improvements. There is also extra cost related to government compliance such as, ear tags and time invested in compliance of regulations.

Truck inspections: the nature of our business requires trucks for just a short period in time over the 12 months of the year but yet we have to inspect the truck each and every year even with a very low amount of kilometers or hours that have been put on the unit. Administration time: The time to administer all the government documentation for GST, Government surveys, employee remittance, corporate tax, rebate/refund forms and etc.

We would like to replace our aging poultry processing plant, but have not moved forward due to the challenges of receiving approval from municipal government, Alberta Environment, NRCB, CFIA, Alberta Agriculture without upsetting our current ability to operate.

Carbon tax is going to be a huge problem and the WCB on the farm with my children and hired help.

PMRA and health Canada approval process for new products, almost impossible for small business.

Archaic laws banning raw milk. Quota systems limit the free market.
**Our Farm Members’ Opinion Survey – Backgrounder**

**July 2017**

**Saskatchewan agri-business owners’ top priority concerns**

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

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<tr>
<th>Issue</th>
<th>Canada</th>
<th>Saskatchewan</th>
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<td>Succession/retirement planning</td>
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<td>Other</td>
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Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608. Saskatchewan responses: n= 210

**Red tape holding back innovation; Saskatchewan agri-business members’ comments**

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

**Livestock**

*Ever changing sanitary and phyto-sanitary regulations around exported products.*

*TFW process, paper work and process is out of date with today’s technology, a simpler application system is needed. We should be able to apply much earlier so if a TFW is denied entry into Canada that there is time to get another TFW at the required time they are needed.*
Continued: Red tape holding back innovation; Saskatchewan agri-business members’ comments

Field Crop

New products coming from other countries.

Very slow approval of new weed control chemicals for minor crops, e.g. canary seed.

Removal of water from fields.

Too much paper work when it comes to government grants.

1. If we want to accept grants for environmentally friendly fuel tanks. We did the paper work & met with the govt agency -- then found out we had to write letters for everything we tried to purchase & have them accepted or rejected. We decided it wasn’t worth the effort & bought ordinary tanks with our own money. 2. In many cases, if you accept money to help with the environment on your farm, that agency had a strong say in what decisions you make even though they don’t have the same experience the farmer does.

There are so many grants that have been available, but at the time they were available I didn’t have the money to act on them or didn’t know about them or the red tape made it take so long I just got frustrated with it.

Introduction of new products for control of weeds and fungal infections in crops.

Not allowing new chemicals onto the market that will help us combat the chemical resistance in some weeds.

Fruit, Vegetable and Horticulture

Municipal regulations regarding signage, parking, licensing, etc.

Ag Services

Regulations as to SRM handling and logging of animals that are not going to end up in the food chain.

The difficulty and time required to get permits to grow, process, and ship industrial Hemp. This often holds up shipping for up to 2 to 3 months.

Other

Carbon tax will significantly affect my bottom line.

There is no government backing or defending patent rights so why spend all the time and money when big companies come in and take the technology and tell you they will just drag you through court until you have no more finances.
Manitoba agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

- Gov't regs/paper burden
- Total tax burden
- Government debt/deficit
- Input costs
- Environmental laws/regulations
- Property rights
- International trade
- Labour legislation
- Transportation costs
- Cost of local government
- Shortage of qualified labour
- Long-term safety net programs
- Succession/retirement planning
- Farm finance
- Other

Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608. Manitoba responses: n= 103

Red tape holding back innovation; Manitoba agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

Livestock

The last provincial government just about destroyed the hog industry in Manitoba with all those regulations.

Field Crop

Currently an organic mite treatment for treating varroa mite disease in beehives is registered to one producer of a product that is $4.35 per colony, there is a much more reasonably priced product produced in Canada with exactly the same organic product, but it cannot be sold to and used by Canadian beekeepers. It is sold to Europe and the USA, I would love to buy and use this product and it would save me money and allow me to use more natural and organic product more often.
Continued: Red tape holding back innovation; Manitoba agri-business members’ comments

Field Crop, continued

Untrained staff that sets their own rules or guidelines. Far too much wasted time.

Water resources won't approve permits. Takes forever to get approval of a grain dryer setup and there are ridiculous building code rules.

Water management in our water basin as allowed in eastern/central water basins.

On-farm processing of product and government regulations on facilities to process.

Ag Services

Regulations regarding NH3 that create a greater hazard, rather than increasing safety.

Food Wholesale and Supply for Agriculture

We cannot put a dealer plate on a new manufactured highway trailer, and drive it to a farm show with other display items on top of the trailer. A vehicle with a dealer plate may not be loaded, but a car with a dealer plates can have a passenger and a driver— the normal "load" for a car — go figure— just a tax grab to collect provincial sales tax.

Other

No municipal tax breaks for environmental improvements.
Our Farm Members’ Opinion Survey – Backgrounder

July 2017

Ontario agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

[Graph showing priority concerns for Canada and Ontario, with Gov’t regs/paper burden at 83% in Canada and 86% in Ontario, and Cost of local government at 42% for both Canada and Ontario.]

Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608. Ontario responses: n=574

Red tape holding back innovation; Ontario agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

Livestock

Paperwork in everything we do, audit, applications, records, etc.

Would like to do on farm processing, but it’s a very difficult and lengthy process.
Continued: Red tape holding back innovation; Ontario agri-business members’ comments

Livestock, continued

Access to import and export permits in a timely manner. Also, CFIA offices in various regions having a different view of the same regulation. CFIA vets, on farm, not trained to be on the farm (they are paper vets). CFIA slow policy review and lack of structure to formally view and review a region office decision that affects business for both exporter and importers. CFIA programs that are viewed as positive and extra-value added that are actually out of date and no longer relevant ex: Leucosis free herds (silly program which has no relevance in the industry any longer, but blocks access to obtaining health permits for animal import and export).

Getting any kind of funding seems to entail red tape.

Regulations and/or restrictions put in place not based on sound science that prohibit advancements in crop protection—these regulations also scare off some possibilities of new advancements due to people/companies not wanting to invest in the research or infrastructure to introduce something new into a market where policy may not be friendly to its long-term use.

Every time we apply for something, we have to report some financial information. The information categories should be the same for banks, tax purposes, census, etc. It is hard to go back in the books and separate information.

When wanting to build, all the paper work, people you have to deal with, makes you not want to.

Regulation on land, how it is used, and water rights.

[Difficulties hiring] foreign labour, slowing our operation from expanding because no one in this country wants to work.

We are aquaculturalists. For all the growth in our area of agriculture, government on all levels do not acknowledge and treat aquaculture like other forms of agriculture. We have been told it is not agriculture. Municipalities do know or understand our type of farming.

Red tape, all the new regulations that have been put in place and more that are on the way, i.e. carbon tax!

Having to complete courses before you can apply for grants.

Would like to have three phase hydro on the property, but government/Ontario hydro has unrealistic expectations from it.

The overall tax burden and the recent reassessment of agricultural land values for increased property taxes will cripple a lot of the future farm improvements and reinvestment to keep operations going. Electricity costs have already doubled in the last year.

The myriad of rules and record keeping requirements for on-farm feed manufacturing is a detriment to doing it.

Property taxes are too high. Every time we do a building project, taxes go up on the buildings.

Building permits and environmental restrictions.

Growing Forward 2 – onerous slow application process. Some completely ridiculous nutrient management laws that are not consistently applied, and in many cases make no sense. Nutrient management rules are enforce/interpreted by people with no practical knowledge or experience with regards to farming operations.

It looks like the Government is more interested in lobby groups than scientific research to set policy, i.e. Neonics.

Field Crop

The neonic rules are a pain, especially in light of lack of scientific proof/data that actually proves that it’s killing bees, when poor beekeeper stewardship is one of the main culprits!

Time it takes to do the paper work and then having to wait six weeks for getting an approval.
Continued: Red tape holding back innovation; Ontario agri-business members’ comments

Field Crop, continued

Because we are overregulated, it adds costs and drives business away.

Time wasted on government red tape. Time!

Pesticide restrictions that are not scientifically backed.

Hydro. With the cost of hydro and all the windmills and solar driving up prices, I have to become a lot more efficient in my business just to expand, because the cost is so prohibitive. Also minimum wage has also made me very careful on expansion and has seriously made it harder on students who are looking for work, because of the wage per hour I need ones with work experience.

Documenting pesticide use and control.

I rely on an ACC loan each spring as an operating line of credit. Government regulation and policy changes made me no longer eligible for this operating line of credit. I have had this loan many times in the past and repay everything borrowed according to the timeline laid out. Never had any issues. Because I am not enrolled in Agristability, a recently introduce rule, I can no longer get the loan. Agristability will not work for my business. I have a tree nursery that operates in a 10–14 year cycle. Agristability is designed for crops that grow and are harvested within 1 year. Therefore I could never claim anything from the program. And it would cost me about $1,600 to be in the program. Cutting off a reliable form of borrowing money, limits my ability to operate this business and make upgrades and changes prior to spring harvesting. Changes to the off-shore labour program makes paper work far more complicated, time consuming and stressful. One mistake and delayed workers...

Red tape involved in purchasing seed.

If we expand our farming business to add value-added to the products we produce we could be reclassified at a commercial or industrial tax rate which would totally wipe out any extra income to our operation that we may earn. So what’s the point of adding value? We would in effect be penalized for the investments and end up with less income! To my thinking, any registered farming operation should be allowed to add income producing activities at no change to their tax rate or category. Especially if it adds a service to the community!

All labour regulations especially hiring SAWP employees. Food safety paperwork to prove due diligence. Too much time spent doing paperwork to appease governments.

Labour regulations make it too dangerous to hire employees that will help with innovation on my farm. I can’t deal with the liability burdens that employee rights and government policies place on my business, so now I am a one-man show which makes me work much harder and leaves very little time to grow my business. But it’s better than dealing with employees.

Restriction on the use of neonic.

Food safety regulations cause me to avoid looking into value added innovations. I stick with other avenues of development towards lower costs or higher return, instead of being open to packaging and food processing options.

Safety regulations, Water permits, every kind of lenience you need to do something on the farm. One needs their life-time to read them and then hire some to understand them.

Controls on selling alcohol products and access to market controlled by LCBO.

Any government law/red tape that increases the costs and reduces profitability which results in less profit to invest in innovation. Example: planning limitations/restrictions at the municipal level.

Government red tape and paper burden takes so much time away from what I do. Too much environmental paper work as well as red tape to just spread manure on my farm.
Continued: Red tape holding back innovation; Ontario agri-business members’ comments

Field Crop, continued

So many new rules apply to the farm industry we are busy trying to get those implemented.

Overall compliance burden takes up too much time.

Most of the branches of government consider themselves enforcement and are critical of any undesired effect of new practices, but do not aid in developing new technologies.

My product is wholesale and I lose about 50% value due to red tape compliance to sell retail, it is very frustrating.

Too much paperwork. I feel fortunate that I have someone capable of dealing with it. Many farms do not.

Every time you go to do a project like building a building, there are many more layers to deal with. Building permits have increased requirements, engineering costs, and now they are proposing development charges on farm buildings. We also do nutrient plans.

I spend so much time looking after government stuff I have no energy left to be innovative. The paper work is horrendous, and as soon as you are finished that you will have an inspector here to make sure you are doing it correctly. Absolutely ridiculous.

It seems as though we are over-regulated, as most things we try to do we end up dealing with some form government intervention which causes delays, frustration, and money.

Registration of new innovative products; many already approved in the EU or the US.

Fruit, Vegetable and Horticulture

By tying up our resources; by introducing new regulations.

All the forms are too difficult to fill out and you cannot get answers from the civil servants.

New Machinery must be installed in a CFIA plant in order for market access.

Sales into the USA are ridiculously prohibitive due to red tape and government regulations.

Programs such as Growing Forward.

All levels, such as added cost to build structures, shops, barns etc.

Tree seed zones have made it more difficult to sell products.

Health and safety regulations.

Carbon tax- cannot expand in Canada!

Cost of hydro and water, increased cost of employee minimum wages forces us to increase all wages, tax burden, paper burden, etc. All costs more to our business therefore leaving less profit at the end of the year for capital projects and the funding of innovative practices.

Significant amount of time has been dedicated to dealing with creating an Abatement Plan and applying for an ECA as part of the Ontario Ministry of Environment inspection that deemed we needed to produce this paperwork to continue using the pond we’ve had for 50 years that is used to divert rainwater off our greenhouses. Even though there is no water runoff from our operation going into this pond we need to complete these documents. Thus far we’ve done it in-house but one Ministry employee recommended getting a consultant (at cost of $9000+) to deal with it for us. This distraction is a major concern and distraction from the core of our business, wasting time that could be used to innovate and improve our operation.

Permits for environmental compliance. Cost of electricity for "green" projects (wind and solar) that are not actually green.
Continued: Red tape holding back innovation; Ontario agri-business members’ comments

Fruit, Vegetable and Horticulture, continued

Products that are natural should not be regulated; it takes too long for products to be registered if they are already registered in countries from which we import foods.

Employment Standards restricts us from expanding.

As we are going to expand our currently existing greenhouse operation we ran into all kinds of requirements from our local and regional and federal governments. Different departments give different answers and they are definitely not always giving the same information. This is very time-consuming and costly. We estimate that the red tape is going to cost us approximately $1 / square foot of the new to build facility. Which is almost 3% of the total building cost, including all technology. In previous years this used to be somewhere between 0.1% – 0.2%.

Government audits that shut down my business for four months and resulted in losing $200,000 this year. How can I invest if I lose money?

Wine production is highly regulated and supply chain managed. Little innovation allowed.

Pesticide registration.

Paperwork burden and rules for the Growing Forward program.

Government taxes and red tape.

Funding and finding partners. Cost of grant writing.

CFIA approval process for various bio control products already used in other countries to control pest and diseases on crops.

Ag Services

Government registrations on new herbicides takes much too long for Ontario/Canadian use.

Being involved in nutrient management business it has caused us to employ more people just to meet the act requirements. Bottom line – more associated costs mean less income.

TSA approval for fans and burners not yet CSA approved. Some inspectors make us fix everything in sight, not just what we are specialized to do.

Food Processing

We have had 3 payroll audits in 18 months with no infractions. The time and effort to accommodate these audits, not to mention the numerous Stats Canada surveys, is very taxing.

Regulation 63/09 – Seed Treatments – specifically Neonics. Export: new requirements for soybeans to USA.

The government regulations are becoming too intrusive in our every day functions. It seems they want complete control over our decisions by adding more paper work detailing why they should be involved. They hire more staff to check on us, making sure we keep giving them the paper work they need.

The red tape burden on agriculture buildings and expansion.

We are so busy dealing with government and marketing boards it takes away from time managing our business.

Rules and regulations.
Continued: Red tape holding back innovation; Ontario agri-business members’ comments

Food Wholesale and Supply for Agriculture

Timeline for registration approval of products and labeling by CFIA – Canadian Food Inspection Agency. Timeline ranges from 24–36 months compared to 3–6 months for the FDA in the US. It is a huge impediment to introducing new agricultural feed and fertilizer products in Canada.

Registration of new products takes too long and a lot of paperwork. Less likely to bring in/ develop new products.

Amount of time and information required for funding opportunities. Time to complete funding requests. Additional requirements from various aspects of government.

Growing Forward is too slow for approvals.

Process of building permits for new and innovative barns for livestock production.

EDC is too slow to implement contracts. Seed development through CSGA is too cumbersome. Working with Ag Canada (crossing boarder) is time consuming. FDA in US is becoming a big problem. Some shipments are held up for 4 weeks.

Government restrictions on proven safe herbicides and insecticides have made farmers keep detailed records of uses of such. New herbicides approved for the Prairies cannot be licensed for Ontario especially when they are necessary for our region.

Paperwork required for such programs as the GLASI application took time and multiple customers applied only to find out that funding was all used up and they would have to wait for funding again.

The nonsense rules for "neonic” class 12 seeds has created a whole level of paperwork that was totally unnecessary. The new discussions on “social license to farm” are another nuisance and complete waste of time.

Dealing with unqualified inspectors who use a printed manual to do their job. These same people have major power over my business (can shut me down if they wish) but cannot do their job without help. I spend way too much time educating and instructing them on how to do their job. In some cases I have done their paperwork for them and just had them sign it.

Other

Recently – Neonic regulations in Ontario. In no–till/reduced tillage systems we use the seed treatment to protect the seed from many insects in the soil. The treatment also protects the soybean plant from soybean aphids which eliminates the need for an insecticide treatment in–crop. Overall the use of this product reduces pesticide use. With very little thought on the consequences, or consultation with professionals in the Ag industry, the Ontario Government went full bore ahead, pushing their own/activists’ agenda. We have honey bees on our farms, plant trees, put up bird houses and fully understand environmental implications of our actions. We grow cover crops to protect the soil and life within the soil. This practice and future experimenting are at risk unless the seed can be protected from some of the negative insects in the soil such as wire worms. Innovation requires the proper tools be available!

Would like to increase production of solar energy on a net metering basis, but application costs are prohibitive ($35,000!).

We are in the process of trying to have Silicon approved for mixing into growing soil by CFIA. Silicon is the second most abundant element on earth – essentially it is “sand” and various forms of sand. CFIA has now taken more than two years to agree that we can incorporate this naturally occurring product into a growing mix for use on flowers, (i.e. not even for food crops!). Ridiculous!
Quebec agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

Source: CFIB Survey, Our Farm Members’ Opinions, No. 23, January-December 2016, Total responses: n=1,608. Quebec responses: n= 276

Red tape holding back innovation; Quebec agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

Field crop

La quantité de paperasse à remplir et suivre toute leurs recommandations???? La lenteur les délais et une quantité d’appels téléphonique à faire aux deux paliers gouvernementaux.
Continued: Red tape holding back innovation; Quebec agri-business members’ comments

Field crop (continued)

Transfert bio dans le sirop d’érable. Recherche et développement pour des essais aux champs sont devenus impossibles. Remboursements de taxes foncières ne finit plus d’exiger des contrats et des signatures de toutes sorte. Gestion des fumiers en tant que receveur, nous avons toutes les contraintes de paperasses sur le dos et nous sommes soumis à des mesures punitives d'éco-conditionalité exagérées pour un papier remis en retard. Voir le cas de Denis Ouellette qui perd plus de 100,000$ pour son PAEF remis en retard et ce sans aucune trace de pollution et un profond respect de l'environnement. On nous parle de prescription d’un agronome pour appliquer des pesticides. Encore des contraintes, des paperasses et des jobs inutiles. On n'en finit plus et c'est décourageant de voir arriver les réglementations une après l'autre constamment. On va laisser à notre relève un environnement d'affaire en agriculture qui va être invivable. Plus il y a des gens qui s'en mêlent plus qu'on s'emmêle. On exploite notre passion.

Bien souvent les petites aides du gouvernement que nous pouvons aller chercher pour notre entreprise aident les intervenants : comptable, agronome, etc... car il faut toujours une signature d'un professionnel pour faire valider notre demande. Donc des $$ et du temps pour préparation du projet. ON se demande si l'agriculteur est juste bon pour travailler sa terre et pour récolter!!

Toute la bureaucratie tant au niveau municipale, provinciale et environnementale.


Aucun dans mon cas.

Food and meat processing

Règlementation de l’étiquetage et la certification bio.

Environnement, faunes et parcs: obligation d'aménagement paysager important suite à l'abattage d'arbres morts dangereux - aucune considération de la nature des actes effectués par le ministère avant d'oblier l'aménagement d'importance qui est non proportionnel aux actes initiaux - le traitement des dossiers est très long Environnement, faunes et parcs: obligation du certificat de conformité sur les rejets qui nécessite beaucoup d’analyses coûteuses et de la documentation à compléter pour s’y conformer, sans tenir compte de la nature préalable des activités de l’entreprise et de ses rejets potentiels (faibles, moyens ou élevés; les normes et la paperasserie sont les mêmes, aucun allègement pour les entreprises à faible potentiel de rejets)- le traitement des dossiers est très long.

La machinerie européenne n'est pas certifiée CSA pourquoi n'y a t'il pas consensus avec les différents paliers du gouvernement?

Fruit, vegetable and horticulture

Demande de crédit d’impôt pour R&D extrêmement complexe.
Continued: Red tape holding back innovation; Quebec agri-business members’ comments

**Fruit, vegetable and horticulture**

Conservation des milieux humide: fait en sorte qu’il a des parties de mon terrain que je ne peux pas utilisé commercialement car il sont considérer comme milieu humide.

Obligation d’adhérer à un syndicat agricole pour se qualifier aux politiques du ministère de l’agriculture du Québec.

Nous subissons peu de restreintes.

Parfois axé sur de plus grandes entreprises.

Produits (pesticides) moins nuisibles qui ne sont pas homologués au Canada en même temps qu’aux États-Unis ou en Europe.

Innovation technologique ; beaucoup de paperasse!

**Livestock and animal**

Les règlement des municipalités qui freinent toutes modifications ou agrandissements.

Le temps passée à compléter les différents documents aux gouvernements sont du temps que l’on ne peux mettre ailleurs pour améliorer nos processus.

**LE NON APPLICATION DES RÈGLES AU DOUANE ET MINISTÈRE DE L'AGRICULTURE PROFITE AU DÉTOURNEMENT DES FRONTIÈRES. ET ENTRAINE DES PERTES ÉCONOMIQUES IMPORTANTES POUR NOTRE ENTREPRISE.**

La baisse de l'accessibilité pour les crédits d'impôts en R & D (50000$ au provincial).

Whilst I agree in Principle with environmental programmes I feel most farmers are conscientious, and caring that they will be innovative in solving or correcting problems that are specific to their business, i.e. manure handling systems. In other words let the gov't run its business, and let us run our own.

Programe d'assurances stabilisations pas disponible pour les nouvelles cultures.

Going organic is very complicated and not the same rules in all provinces.

Souvent, il faut faire affaire avec plusieurs Ministères (exemples : Agriculture, Environnement, Ressources naturelles) et faire des rapports réguliers ou annuels. Ce qui multiplie le temps affecté à la rédaction de ces rapports. Souvent, également, il est difficile d’être capable de rejoindre par téléphone ou autrement la bonne personne-référence par laquelle on peut obtenir des informations FIABLES.

Environnement.

Lait diafiltré qui entre des états unis, non-respect des barrières tarifaires par le gouvernement fédéral.

Épandages de centres, épandages de fumier faut toute marquer les voyage qu’on épandent. Les tag de ATQ faire le suivie des numéros et de remplacer les boucles quand il en manque et de dire quel numéro qui manque. Car en Ontario pose des tag juste à la sortie de la ferme.
Continued: Red tape holding back innovation; Quebec agri-business members’ comments
Livestock and animal (continued)

Dans tous les programmes gouvernementaux, le temps et les travaux effectué par le producteur n'est pas compté dans le pourcentage de la subvention. Coupure dans les projets R/D.

Frais d’ingénierie et d’architecte pour de simples bâtiments permis d’environnement.

RESSERRER LES BARRIERES TARIFAIRES PLUS DE VIGILENCE SUR LES PRODUITS UI ENTRE AU CANADA

Les accords de libre échange qui ont un effet direct sur le prix du lait, qui affecte grandement nos revenus et nous empêchent d’innover. Le crédit de taxes foncières qui est menacé et qui affecte aussi nos revenus déjà plutôt faibles en agriculture par rapport au temps que l’on travaille.

Dans le cas de la subvention du Mapaq l’attente pour une réponse est de minimum 2 mois et a déjà été 6 mois. Les soumissions ne sont plus tellement valables...il y a plusieurs documents à fournir ou à trouver sur internet : des cahier de bien être animal par exemple.

Tous les programmes de contrôle de qualité excessifs.

Selling our own products, it is a no ending of regulations.

For example, if I wanted a small butcher shop on my farm, I need to be approved by all levels of government, pay for a study, could be told no, meet all rules, take a long time, pay for vet to check the meet, and I have sold 1lb of meat yet!

Trop compliqué de commencer un projet, trop de réglementation trop de papiers à remplir

Obtention d’un permis pour une nouvelle construction. Distance en règlementation.

Les frontières ouvertes !!! C’est un désastre pour nous en agriculture. Nous avons de la difficulté à rentabiliser notre entreprise parce que les revenus ne suivent pas les dépenses...Nous étirons les prêts, accumulons des dettes chez des fournisseurs (vétérinaire, meunerie...)situation très difficile à vivre autant au niveau entreprise que familial!!

Wholesale and supply for agriculture

Un temps fou à ré remplir et à répondre aux différents paliers de gouvernement principalement au provincial. Le temps qu’on y passe n’est aucunement productif et nous avons l’impression que chaque niveau d’un ministère donné protège son emploi au lieu de donner suite rapidement à notre demande (ex: demande d’un permis quelconque).

On ne demande plus de crédit R&D trop de paperasse et de contestation pour des riens.


Permis de toutes sortes.

Pour ma part c’est plus le temps passé a remplir de la paperasse qui pourrait être occuper a de meilleur tache.
Atlantic agri-business owners’ top priority concerns

Which of the following issues is a high priority concern for your agri-business? (Select as many as apply) (% response)

Red tape holding back innovation; Atlantic agri-business members’ comments

Please outline a specific example(s) of a government regulation that holds back innovation in your agri-business and how it has impacted your business (Source: CFIB, 2016 National Agriculture Survey, Oct-Nov 2016).

New Brunswick

Field Crop

*HST and salary deduction remittances.*

The whole egg quota system is one example. We raise organic eggs and cannot meet the demand due to restrictions on allowable numbers of birds. Purchasing quota is not economically logical or feasible.
Continued: Red tape holding back innovation; Atlantic agri-business members’ comments

New Brunswick

Ag Services

*Funding for Growing Forward was distributed unfairly. Applicants were not informed this was on a first come basis, yet a deadline date for applications was set. No funding to a good majority of applicants was available. Those that could use the funding to grow their business were left in limbo with a very sour and negative outlook on administration of these programs.*

Nova Scotia

Livestock

*Allowing the price of our product to fall well below cost of production.*

*Food safety has added a lot of cost and time to running a dairy farm.*

*Wildlife permits and resources and zoo permits – renewals and issuing.*

Ag Services

*Requirements for commercial kitchen for processing of food for small scale farm and production.*

*All animal feeds sold must be recorded and assigned to each individual customer. If the customer doesn’t want to tell you their name you cannot sell to them.*

Other

*Our business is totally Agri–business, but is defined as land–based aquaculture. The Aquaculture Industry in Canada is ripe for expansion, is overly regulated, but has a much smaller lobby with significantly fewer supportive programs than agriculture does. We feel this has to change radically to develop the tremendous potential of our marine, land based fledgling industry.*

*Grants are not released with significant lead time to apply. By the time they come out, the deadline for application is about seven days away.*

Prince Edward Island

Livestock

*Inter–provincial trade laws – provincially inspected meat cannot be sold province to province.*

*All the extra costs like environment animal welfare taxes which other countries do not have are making our costs too high which makes us uncompetitive.*

Other

*When we look for funding there is no one–stop shop. Innovation PEI, ACAO, NSERC, SRED, Dept of Agriculture, and various other initiatives.*

Newfoundland and Labrador

Fruit, Vegetable and Horticulture

*Access to crown land and the time it takes to get approval*