

Sent via email March 20th, 2020 to:

Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs

Hon. Steve Clark, Minister of Municipal Affairs and Housing

Dear Minister Hardeman and Minister Clark,

There is a very concerning situation coming to light regarding construction of farm buildings in Ontario. Many building departments are now effectively closed and are no longer providing inspection services. Building departments have indicated that architect/engineer review and report cannot be used as a replacement for municipal reviews. This policy will bring all farm building construction to a halt, and impact food production. Premier Ford has indicated that a halt in construction is not his intent and he specifically indicated that construction was to continue under the State of Emergency.

The Canadian Farm Builders Association is very concerned about what will happen to our industry if building departments no longer provide inspection services to sites during this time of dealing with Covid-19. We have many farm facilities that are nearing completion, livestock is ordered, and animal housing will be required. We have new farm buildings scheduled well in advance with a hard completion date due to livestock needs. We will have unfinished livestock buildings, with livestock scheduled to arrive in the near future. This will pose a huge problem to our farming community as well as affect the construction economy in a very negative way. A way to offset this issue is to allow Architect/Engineers reviews and reports to be a replacement for municipal review on an interim basis during this critical timeframe. There is already overlap in this area with architect/engineers reviewing and overseeing the projects so there would be continuity in ensuring that agricultural buildings continue to be built according to the required building codes. The agricultural sites in rural areas can be visited and inspected while still practicing the social distancing required. This is going to need immediate attention.

Due to the State of Emergency, we are requesting that the clause in the Ontario Building Code requiring building departments to do inspections be temporarily deferred in favour of professional review to allow farm building construction to continue, and to allow for

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continued production of food. We recommend that a provincial policy be established to allow professional review while municipal building departments are not available. This is critical to the viability of the farm building industry and continued food production within the province.

We have discussed this matter with senior representatives of the Ontario Building Officials Association (OBOA) and they are ready to help. A plan of action to address this issue would support continued confidence in government through these turbulent times, and moving forward.

We thank you for your attention to this critical matter.

We have cc'd the following potential stakeholders:

Michael Leach, P. Eng. President Canadian Farm Builders Association

Brian Brubacher Vice President Canadian Farm Builders Association

Terry Rothwell, P. Eng.
Past President
Canadian Farm Builders Association

Steve Beadle, P. Eng.
Engineer, Farm Buildings
Engineer, Sheep and Swine Housing
Ministry of Agriculture, Food and Rural Affairs

Grant Brouwer President Ontario Building Officials Association

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Matt Farrell Immediate Past President Ontario Building Officials Association

Canadian Commission on Building and Fire Codes (CCBFC) Joint Task Group on Farm Buildings, members:

Will Teron, P. Eng. Gary van Bolderen

Canadian Commission on Building and Fire Codes (CCBFC) Standing Committee Structural Design Working Group on Farm Buildings, member: Will Teron, P. Eng.

Ian Cunningham
President
Council of Ontario Construction Associations

Johnny Zuccon, P.Eng. CEO/Registrar Professional Engineers Ontario

Kristi Doyle Executive Director Ontario Association of Architects

Mélisa Audet Manager, Practice Advisory Services Ontario Association of Architects

Best regards,

General Manager on behalf of the Canadian Farm Builders Association

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