



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

May 24, 2017

Ms. Madhu Malhotra
Manager
Ministry of Environment and Climate Change
Climate Change and Environmental Policy Division
Land and Water Policy Branch
40 St. Clair Avenue West,
Floor 10,
Toronto, ON
M4V 1M2

Dear Minister,

EBR 012-9971 Canada-Ontario Domestic Action Plan for Lake Erie

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The CFFO recognizes the significance of the problem of algal blooms in Lake Erie and the risks these pose to human health, to our economy, and to the health of the lake and watershed ecosystems. Nutrient loading, especially that of phosphorus, is a key contributing factor to this problem. All citizens in Ontario need to work towards a solution to this complex problem. It is good to see that the Draft Action Plan addresses many sources of phosphorus, and proposes action plans for each source. As an agricultural organization, we recognize the need for farmers to contribute positively through good stewardship practices.

With respect to the specific actions proposed for the agricultural sector, these actions recognize that Ontario farmers are already actively working to improve environmental stewardship on farms. Farmers do this through individual entrepreneurial improvements on farms, through industry led initiatives, and with government support.

1. Do you have any feedback or input on the proposed actions outlined in this document?

A3.1 The CFFO supports greater efforts to prevent and control the negative impacts of invasive species that are negatively impacting levels of phosphorus in Lake Erie. In particular, the spread of phragmites australis subsp. australis, which is now established in many areas across the province, is causing damage to wetlands.

A3.2 The CFFO is supportive of focus within the next agriculture policy framework on a whole farm approach to BMPs to address phosphorus reductions.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

A3.3 The 4R Nutrient Stewardship program initiated by industry in Ontario is already showing significant uptake and success. Part of the success of this program is that it is voluntary. Farmers are willing to participate because they see the value of the program both for themselves and for society at large. Continued government support for this industry-led voluntary program will enhance its ongoing success.

A3.4 The CFFO encourages government to support innovation and economically viable solutions that encourage transition to new technologies and methods that address phosphorus issues at a whole farm level for all types of farms, including greenhouse operations.

A3.5&6 The benefits of stewardship of important habitat and natural features on private land need to be recognized, and landowners should be suitably compensated or rewarded for the ecological goods and services they provide through this stewardship effort on behalf of the broader public.

B1.2 Application of nutrients in the non-growing season has risks for the environment and can also significantly reduce the benefits farmers receive from the nutrients applied. Education on the right time to apply nutrients needs to be accompanied by collaborative extension to help farmers find solutions for alternative application times and methods appropriate for their farm, as well as significant cost share or incentives to allow farmers to increase their manure storage capacity.

Because Ontario has such a diversity of growing areas, strictly time-based nutrient application regulations would not be suitable for Ontario farmers. Within a defined non-growing season, regulations should be condition-based (on the condition of soil, for example).

B1.4 Healthy soils provide diverse benefits to farmers and the public at large. Initiatives through the Agricultural Soil Health and Conservation Strategy should be aimed to consider all the benefits that can be derived from healthy soils, including the positive impact this has on the quality of food and food production, carbon sequestration, and importantly for this Action Plan, water quality. It should also recognize the significant contribution farmers make through their soil stewardship efforts.

B1.5 Because a lot has changed in landscape management and climate, a review of the rural storm water and agricultural drainage management is fitting.

B1.7 Requirements for mandatory pump-out and inspections of septic systems should be implemented only in areas where there is demonstrated concern or issues.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

B1.8 Materials that fall under the category of hauled sewage are not all alike, and policies should recognize suitable handling based on the risks and potential uses for each type.

B1.9 Reducing unnecessary phosphorus from animal feed is important and beneficial as the industry, through better research and innovation, improves efficiencies in animal production and inputs. However, phosphorus is still necessary for animals, and a push to reduce phosphorus in feed or manure must not do so at the cost of the health of the animals.

B2.1 The proposed LiDAR elevation mapping is one tool that will benefit farmers and others.

C1-3 Government needs to support the efforts of farmers and others with greater publicly available research and data tools. Ongoing research, measuring, and monitoring will also need to be primarily the responsibility of government to ensure that long term, relevant data is collected and available to allow for better decision making at the farm level and at the policy level.

C4 Government support is also important for research into new or improved technologies and BMPs or other methods to reduce phosphorus loadings.

The CFFO does not see water quality trading as an efficient way to reduce phosphorus loadings in the Lake Erie watershed.

D1.3-5 These are important initiatives as part of the needed education on the appropriate time to spread nutrients, mentioned above, and on soil health. Education on phosphorus issues and impacts more generally (as addressed in several of the other actions in Category D) are also important.

E2 An adaptive management approach focused on collaborative and continuous improvement, rather than a heavily regulatory approach, will be far more successful in building the sense of public ownership of the issue and innovative solutions to the problem. The actions outlined in the Draft Action Plan recognize the improvements that have already been made and are underway. Continuing in a collaborative approach will build on this success into the future. Effectively communicating the updated understanding of the impacts of current efforts and of changing approaches for improvement will be important as well.

2. Many agencies, stakeholders, and other partners have a role in reducing phosphorus loadings to Lake Erie. What actions does your organization/community plan to undertake as part of the Action Plan?

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

The CFFO continues to be actively involved in the 4R Nutrient Stewardship Program and an active participant in the government's working groups on the Lake Erie issue.

We appreciate this opportunity to respond to this Draft Action Plan, and we thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Nywening".

Clarence Nywening, President
Christian Farmers Federation of Ontario