



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Mr. Ian Cameron  
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Ministry of Natural Resources, Natural Resource Management Division  
Lands and Waters Branch, Water Resources Section  
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October 8, 2009

**Re: EBR# 010-7477 - Amendments to Ontario Low Water Response Policy**

Dear Mr. Cameron,

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide comments on EBR# 010-7477 – “Amendments to Ontario Low Water Response Policy”. The OFA is the voice of Ontario’s farmers, representing over 38,000 individual members and 30 affiliated organizations.

The OFA has a long history of involvement in water-related issues throughout the Province. Farmers rely on the air, soil and water to conduct their business, and as such, have a vested interest in the sustainability of these resources.

OFA applauds the recognition of animal (livestock) water needs as an essential use during Low Water periods. It is crucial that our farm animals are able to receive the water they require. Other agricultural water uses must also be given a high priority for water access. This process must recognize that an entire year’s income for a family can be lost if the crop does not receive adequate amount of water at critical times. This loss cannot be recovered in agriculture as it can in other industries can (i.e. by adding extra shifts, etc.). Similarly, while this document states that the Ontario Low Water Response (OLWR) is not disaster relief, it must then serve as a trigger to the government of Ontario to provide relief to farmers faced by crop damage and decreased production as a result of drought conditions.

Section 4.1 mentions data and information requirements for decision making purposes under the OLWR. Without detailed information of what specific kinds of data are required, it is difficult to assess the ease and appropriateness of gathering this information “during the year before the onset of Low Water Conditions”. If these data requirements mirror those suggested in the Innisfil Creek OLWR Pilot Project Report then some of these approaches are unrealistic. For example, it is impossible to provide accurate weekly irrigation needs in the spring. Similarly, determining the market value of the crop ahead of time is not possible for most crops. It will depend entirely on the market for that particular year, which can fluctuate significantly. It is also important to remember that an entire year’s income could be lost if plants do not get the appropriate amount of water at critical times.

Section 4.6 speaks to Long-Term Management components of OLWR. Looking ahead to determine long-term strategies often involves initiative and creativity in developing alternatives. The MOE, MNR and local governments must allow flexibility in creating these solutions. Government policies and resources must be conducive to proactive approaches. This means, for example, making it easier to establish irrigation committees and systems that will look to appropriately scheduling water use. It also includes permitting



alternative water supplies such as off-line ponds. Unfortunately, both the MOE's policies, and many Conservation Authority "pond policies" prohibit or discourage the use of such alternatives. There needs to be considerable work done to eliminate these inconsistencies to ensure farmers have true water supply alternatives to consider as a means of managing during low flow periods.

It is important for local area farmers to be represented on the Water Response Team (WRT). Since the co-chair cannot engage in dialogue with the WRT on issues where there is a potential conflict of interest, then there must be two farmers on the team if an agricultural representative is also co-chair. This will eliminate the potential difficulty of losing the agricultural perspective in this circumstance.

In moving between low water levels, this proposed revised policy encourages local thresholds be developed to augment provincial thresholds, and the Conservation Authorities develop local minimum in-stream flow thresholds. It is important that these thresholds are scientifically based and reasonable. It does not do any good to provide excessively conservative thresholds. This would tend to foster mistrust and an unwillingness to cooperate in the process – an outcome that is not in the best interest of managing our water supplies.

Finally, OFA is pleased to see the recognition of public education as an essential component to long-term water management. Public education and stewardship are vital to the success of managing our natural resources.

I trust our opinions and recommendations will be given due consideration. If further clarification is required, please contact Tina Schankula, Policy Researcher directly at 416-221-8523 ext. 303 or at [tina.schankula@ofa.on.ca](mailto:tina.schankula@ofa.on.ca).

Sincerely,

A handwritten signature in black ink, reading "Bette Jean Crews". The signature is written in a cursive, flowing style.

Bette Jean Crews,  
President