



Ontario Federation of Agriculture

Ontario AgriCentre

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November 25, 2016

Paul Smith, Senior Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph, ON N1G 4Y2

Dear Mr. Smith,

RE: EBR Registry Number: 012-8468 - Discussion Document for Developing an Agricultural Soil Health and Conservation Strategy for Ontario

The Ontario Federation of Agriculture (OFA) is pleased to provide comments on the Discussion Document for Developing an Agricultural Soil Health and Conservation Strategy for Ontario. The OFA is Canada's largest voluntary general farm organization, representing over 36,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

In general, OFA agrees with the direction of the discussion document and strongly supports actions to build a strategic approach to managing the health and sustainability of Ontario's agricultural soil resources. We appreciate the level of consultation OMAFRA has engaged in and are confident that the strategy that emerges will serve the farm community well and protect our vital soil resources. We also welcome the dedication of \$30 million from the Climate Change Action Plan as recognition of the importance and value of this initiative to the health and sustainability of Ontario's soil resources. We understand this is the first step in the strategy development process and we look forward to future consultations on what specific actions the strategy intends to take.

The discussion document has well captured the importance of agricultural soils to the lives and livelihoods of Ontarians, and the need to promote soil health and encourage conservation efforts. We share in this appreciation of the value of agricultural soils, and as such, there is no need to further elaborate on this in our comments. Given the importance of soils to society as a whole, and to advance the notion that soil is not just "dirt", we suggest that the strategy specifically highlight a definition of agricultural soils and seek common adoption of this definition across government ministries.

There are currently a significant number of other strategies and pieces of legislation that either directly or indirectly impacts the management of Ontario's agricultural soils. OFA strongly recommends that the agricultural soil strategy provide a collaborative and coordinating approach to harmonizing other initiatives in order to eliminate what is already a growing patchwork of legislation. Understanding that there is a growing amount of legislation dictating how farmers are to interact with the environment, a strategy that recognizes linkages and provides a clear pathway to coordinating existing legislation will likely elicit greater acceptance and participation by those it intends to impact. Furthermore, we recommend that the strategy take into account and link to the growing number of sustainability initiatives and assurance programs that touch on soil health. Both the Environmental Farm Plan (EFP) and the Sustainable Food and Farming Initiative (SFFI) are examples of farmer driven programs that seek to include a greater emphasis on soil health and carbon sequestration.

Actions from the strategy should build capacity for change to soil management and help facilitate the adoption of best management practices. This requires a thoughtful understanding of the constraints on farmers to produce a crop, generate an income, and provide for their families. The strategy must recognize these constraints and be flexible to work within them while accommodating the individuality and unique contexts of each farm. In this regard, we recommend that investment in extension services that can adapt existing best management practices and provide tailored advice to farmers be built into the framework of the soil strategy. Investing in a variety of extension services and a variety of delivery agents is a wise choice given the wide range of capacities, existing knowledge, and types of farmers that exist in Ontario.

One of our greatest concerns with regards to soil health and conservation is around the changing nature of land tenure in Ontario. There is currently an estimated 36% of our agricultural lands that are rented. Maintaining and rebuilding soil health can require significant investment and long-term planning on the part of land managers to increase soil organic matter, implement erosion control measures, or plant cover crops. While it is not always the case, the length of term farmers are on rented lands makes the investment in these activities unattractive and improbable. Certainly the strategy must provide direction to improve the soil health management practices among those farmers that own the land they manage, however we must not ignore the serious issue of land tenure and target not only farmers but also those who rent out their land. We suggest that the strategy expand its focus from farmers to all rural land owners.

OFA believes that a real soil health program must start with clear baseline data on the current state of Ontario soil. We have advocated for an investment in soil mapping across Ontario to determine what is currently “in the bank” and exactly what challenges and opportunities lie before us in terms of improving soil health for future generations. We are encouraged to see soil information and mapping are key themes in the development of the strategy.

We see great potential in the wide range of new technologies that are emerging to coordinate activities on the farm, maximize the efficiencies of farm inputs, and monitor biological activities in agricultural production. Precision Agricultural Technologies can often serve dual purposes; increasing profitability to the farm by maximizing the utility of inputs and resources, and lessening the impacts of agricultural production on land, air, and water resources. Soil mapping is a crucial

step to increase the utility of current and future technologies that can better protect soil health. It goes without saying that the mapping exercise should be done in coordination with potential end users and technology generators to ensure the greatest utility of mapping data.

OFA sees added value in the soil strategy as a vehicle to build the public's trust in our farmers by showcasing their efforts to protect and enhance this essential resource. Furthermore, recognition of efforts to protect environmental quality is a proven and powerful motivator within the farm community and should find a place in the actions taken by the strategy.

As we embark on our 81st year of service and support for Ontario farmers, the OFA has adopted a new mission statement – Farms and Food Forever. The updated mission reflects our need to think long term, our need to practice sustainable farming, and the increasing interest and perception of agriculture by consumers. From primary producers to urban consumers, farming, food, technology and sustainability are becoming commonplace in our everyday discussions. OFA is reflecting this changing landscape with our bold mission and a focus on meeting objectives to ensure Ontarians always have local food available.

OFA has been engaged in the development of the soil health and conservation strategy since its inception and the development of this discussion document. Our farmers are now looking to the next steps in this process for clarity on what specific actions will be taken to achieve the stated outcomes. We look forward to continuing to work with the Ministry of Agriculture, Food, and Rural Affairs to further develop this strategy and to be a champion for productive, sustainable agricultural soils.

Sincerely,



Keith Currie
President