



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Ms. Madhu Malhotra  
Manager, Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Land and Water Policy Branch  
135 St. Clair Avenue West, Floor 6  
Toronto ON M4V 1P5

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Dear Ms. Madhu,

The OFA is pleased to have this opportunity to respond **EBR #012-8760: Reducing Phosphorous to Minimize Algal Blooms in Lake Erie.**

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.

Farmers are integral partners in managing the natural environment. They rely on the air, soil and water to conduct their business, and as such, have a vested interest in the sustainability of these resources. Because of the nature of agriculture in Ontario, and the fact that farmers interact intimately with the natural environment on a daily basis, an agricultural perspective to water resource management is critical.

Development of an action plan to reduce Ontario's phosphorous contributions to Lake Erie must be science-based, and recognize that the agricultural community has a long and successful history of successful voluntary programs. While this submission will focus on the agricultural components of the proposal, OFA recognizes the need for action to be taken by all sectors to address the issue of phosphorous in Lake Erie.

In the EBR posting, the following actions are proposed for addressing Agricultural Sources of Phosphorous:

- Decrease phosphorous run-off during high risk period (non-growing season), outreach to farmers.

It will be important to clearly define what constitutes the "non-growing season". It will also be of great value to work with the agricultural community directly to assess existing BMP's that achieve this goal.

- Support for the 4Rs implementation.

The OFA fully endorses the 4Rs program and encourages any support this program can receive. However, we believe that participation by farmers must remain voluntary.

- Leverage funding under GLASI for nutrient management and soil health projects, targeted to the Lake Erie area.

The OFA supports the leveraging of existing funds, but must ensure that this does not take funds away from other important projects. It must also be recognized that additional funds, outside of this program, will be required to successfully meet the phosphorous reduction targets.

- Develop Agriculture Soil Health and Conservation Strategy.

OFA fully supports the development of this strategy.

- Continue to promote environmental sustainability BMPs.

OFA continues to be supportive of the use of BMP's. However, we also believe that the implementation of BMPs must remain voluntary and meet the unique circumstances of each individual farm.

- Develop publically available digital elevation model of the Lake Erie watershed (LiDAR).

OFA is in support of continued scientific advances and use of proven tools to assist with continual improvement of management practices in all sectors.

Ultimately, success of this initiative can only be achieved by ensuring direct involvement and input from the agricultural sector; using best available science; ensuring the Principle of Sustainability (which considers environmental, economic and social factors) is applied; and having appropriate resources available for implementation.

It may also be necessary for the Province of Ontario to review and revise some of their own existing policies and programs that may prevent the adoption of cost-effective practices and technologies by farmers. Discussions with the agricultural community will help to identify policies that impede the adoption of beneficial management practices and new technologies, and work toward changes that are mutually beneficial.

I trust our opinions and recommendations will be given due consideration.

Sincerely,



Don McCabe  
President