

May 24, 2017

Ms. Madhu Malhotra, Manager  
Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Land and Water Policy Branch  
[madhu.malhotra@ontario.ca](mailto:madhu.malhotra@ontario.ca)

Dear Ms. Malhotra,

**EBR 012-9971: Canada-Ontario Action Plan for Lake Erie**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential 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. We are pleased to provide our input into **EBR -9971: Canada-Ontario Action Plan for Lake Erie**

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

OFA is pleased with the description of the problems and explanation of the causes of the resurgence of the algae in Lake Erie. "The causes are complex, and include factors such as a warming climate, altered hydrologic patterns, changes in land use and management, and the arrival of invasive zebra and quagga mussels." It is reassuring that the changing environment in and around the lake is being recognized as a significant cause of the issues to be addressed. It is also important that these changes to the environment in and around Lake Erie are clearly articulated to the public and any interested parties. In the absence of the recognition of these significant changes, some may erroneously conclude that farmers are being careless in their practices, for example.

OFA advocates the use of voluntary stewardship programs for bringing about change in the agricultural community, supported by over 25 years of success. Furthermore, it is our belief that additional regulatory tools would result in contradictory rules, duplication and unnecessary burden on farmers. There are many existing laws that, when enforced consistently, provide ample protection for Lake Erie. Existing laws include: Nutrient Management Act, The Drainage Act, The Great Lakes Protection Act, Clean Water Act, The Safe Drinking Water Act, Environmental Protection Act, and the Provincial Policy Statements.

**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?**

Ontario's agricultural community has a long established history of continuous learning and improvement; and will continue to participate in the development and implementation of voluntary beneficial management practices regardless of their association with the Action Plan. That being said, there are some actions that are currently being targeted to the phosphorous loading in Lake Erie.

The OFA is partnering with the Great Lakes – St Lawrence Cities Initiative in a project "Thames River Phosphorus Reduction Collaborative". We are looking at a suite of effective land management and drainage solutions for agriculture, developed cooperatively with partners, for reducing phosphorus and improving water quality in the Thames River. This project is one component of what is viewed as being a 5-7 year project. However, continuation of this project will be dependent upon funding beyond the current commitments that last to the end of October 2017.

The objectives of the project include:

1. Communicate how excess phosphorus moves off agricultural land and makes its way to Lake Erie.
2. Identify and communicate solutions that can be implemented to address Canada-Ontario Domestic Action Plan targets.
3. Develop a Business Case for government funding to finance
  - a. A network of demonstration sites that clearly show effective phosphorus reduction solutions in Thames River tributaries and head-waters.
  - b. Introduction of new technologies and their assessment
  - c. Farm field direct inlets, drainage outlets, municipal drain and ditch improvements to minimize phosphorous movement due to erosion by wind and water.
4. Encourage the adoption and promotion of the solutions by communicating project progress on an ongoing basis.

OFA is also supportive of and involved with a number of other agricultural initiatives including:

- The 4R program – the right fertilizer source, right rate, right time and right place
- Participation in "Timing Matters" initiative with OMAFRA and Ontario agriculture commodity groups to achieve behaviour change towards proper timing of manure application and avoid application on frozen and snow-covered ground.

**3. How do you see regional or local planning initiatives linking with or fitting into the implementation of this plan?**

In order to accomplish the desired outcomes, it is critical that all initiatives are approached in such a manner as to minimize any unintended consequences. It is essential that initiatives do not contradict or duplicate each other, or existing programs.

Voluntary stewardship programs have been, and continue to be, extremely successful in bringing about desired changes in the agricultural community. Voluntary programs, with adequate cost-

share programs backing them, are viewed as having the most likely success in achieving the desired outcomes. Geographically focused voluntary agricultural programs have been successfully used in the past (ie. Lake Simcoe Farm Stewardship Initiative). Education and awareness campaigns are also very useful.

**4. What do you see as the most significant barriers to reducing phosphorus loadings to Lake Erie? Do you have any suggestions for overcoming these barriers?**

The most significant barriers to reducing phosphorous loadings will be financial and data. It is essential that substantial investments be made in addressing phosphorous loadings in Lake Erie. Voluntary agricultural cost-share programs are routinely over-subscribed, with more projects proposed than cost-share dollars available.

Data will be a barrier as there are significant gaps in data that would help with understanding both the issues and successes going forward. It is a commonly held belief that there will be a time-lag between actions on the ground being implemented, to the time substantial improvements may be seen in Lake Erie. Data in the form of research and monitoring will be critical to making assessments through this time-lag period. This also has financial implications as research and monitoring can be quite costly.

**5. As all sectors and communities within the Lake Erie basin need to take action to reduce phosphorus loads, do you have any recommendations on how to encourage collaborative action?**

The OFA- Great Lakes St. Lawrence Cities Initiative is an excellent example of collaborative action. The Steering Committee for this project alone includes membership from the following:

- OFA
- Great Lakes St. Lawrence Cities Initiative
- Essex Kent Federation of Agriculture
- Grain Farmers of Ontario
- Kent Federation of Agriculture
- Lambton Federation of Agriculture
- Middlesex Federation of Agriculture
- Ontario Fruit Vegetable Growers Association
- Ontario Pork
- 4R Nutrient Stewardship
- Municipality of Chatham Kent
- City of London
- Chippewas of the Thames First Nations
- Lower Thames Conservation Authority
- Bluewater Pipe Inc
- LICO
- Prof Drainage Engineers
- Drainage Superintendants
- Canadian Freshwater Alliance

**6. Tracking progress and adaptive management will be essential for ensuring that actions are making a difference to the health of the Lake Erie basin. Do you have any specific ideas for measuring progress towards achieving Lake Erie phosphorus load reduction targets?**

Investment in monitoring will be critical to assessing progress in the health of Lake Simcoe.

**7. Do you have any other suggestions for reducing, managing or treating phosphorus runoff and discharges, including innovative approaches or technologies for phosphorus removal or recovery?**

One aspect of the OFA-Great Lakes St. Lawrence Cities Initiative proposes looking into technologies. We anticipate being able to share additional details as this component of the project advances.

In summary, Ontario's agricultural community continues to be invested in the well-being of Lake Erie. Voluntary stewardship initiatives and cost-share programs have a history of proven success with the agricultural community and should be the preferred means of addressing phosphorous loadings into Lake Erie. It is our belief that meeting the commitments of reducing phosphorous loadings to Lake Erie can be met using existing regulatory tools. Passing of new laws will almost undoubtedly cause conflict and duplication; and will work against achieving the desired results. Significant financial investment will also be important to ensuring success – in both achieving reduced phosphorous loadings to Lake Erie, and being able to corroborate those findings.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie". The signature is fluid and cursive, with the first name "Keith" written in a larger, more prominent script than the last name "Currie".

Keith Currie  
President