



Ontario Federation of Agriculture

Ontario AgriCentre

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December 29, 2017

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-013-1373 – New Horizons: Draft Agricultural Soil Health and Conservation Strategy for Ontario

The Ontario Federation of Agriculture (OFA) is pleased to provide comments on *New Horizons: Draft Agricultural Soil Health and Conservation Strategy for Ontario*. OFA is Canada's largest voluntary general farm organization, representing over 37,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

OFA generally agrees with the direction of the Draft Strategy that emerged from the previously released Soil Health Strategy Discussion document. We strongly support actions to build a strategic approach to managing the health and sustainability of Ontario's agricultural soil resources.

The Draft Strategy clearly articulates the importance of agricultural soils to the lives and livelihoods of Ontarians, and the need to both promote soil health and encourage conservation efforts. We share in this appreciation of the value of our agricultural soils.

We appreciate the level of consultation OMAFRA has engaged in throughout the development of this Strategy. We are confident that this Strategy will serve the best interests of the farm community, while protecting our vital soil resources. After this Strategy is adopted, we expect OMAFRA will provide the same level of consultation and consideration during the policy/program development phases. We also expect that future consultations will directly involve commodity organizations, especially when Proposed Actions will directly impact their members. OMAFRA should respect their practical understanding of what is possible and what timelines are realistic. OFA supports the idea of a longer-term collaborative approach to guide the implementation of the Soil Strategy through an Ontario Soil Health Partnership. We look forward to being actively involved in developing the Partnership and to help drive the Soil Strategy forward.

Many of the proposed Draft Strategy actions are communication and awareness building activities. Increasing the adoption of new or novel on-farm practices, especially practices that have little or no financial return, requires effective communication to explain the problems and risks, and to suggest possible actions. A holistic approach is needed where the range of capacities in the farm sector to carry out actions is understood and acknowledged. Building consensus on practical approaches to changing behaviours in those areas that are negatively impacting long-term soil health is required.

Successful adaptation involves appreciating the potential economic impacts of adopting new management practices. A best management practice will not be adopted without careful consideration of how it will fit practically into a farm's current business structure and how it will suit existing farm equipment and expertise. New tools and resources for farmers are needed to support better on-farm decision making, not only to assess changes to soil health management, but also to assess the economic impacts of these changes.

Soil Strategy implementation will also require significant knowledge translation and transfer resources, as well as program delivery partners who can provide farm-level adaptation of program priorities. We support Proposed Actions that will "promote, research, adapt and support the adoption" of soil health practices, but caution that this will require significant resources towards active participation with farmers. We are encouraged that Proposed Actions include recommendations to involve industry partners and service providers in the knowledge and capacity building process.

Prioritizing the proposed action areas is challenging, especially considering the interconnectedness of many of the Proposed Actions. OFA suggests that more clarity is needed before practical, effective, and measurable policies and programs can be developed to implement the Proposed Actions. Accordingly, we believe the initial focus of the Strategy would be most appropriately centred around soil data collection and synthesis to inform the policy and program development process. In addition to the need for soil data, further research is required to identify key soil health indicators needed to establish a baseline and assess soil health.

The Proposed Action on page 23 states, "Examine the potential of other agriculture programs to encourage good soil management practices such as through enhanced eligibility requirements". While we understand the intention of this Proposed Action is to provide a stronger push towards adoption, OFA opposes requiring implementation of best soil management practices to be eligible for programs such as property tax, crop insurance, or cost-sharing opportunities. Burdening other programs with added eligibility requirements is not appropriate. It lessens the capacity of those other programs to achieve their specific program objectives. We also believe it would run counter to the good-will and relationship-building that will be required for effective implementation of the Draft Strategy. Evidence, followed by education and knowledge transfer, coupled with appropriate incentives for voluntary adoption of practices is a more appropriate direction.

The Draft Strategy does not currently mention the role of soil drainage towards soil health. In many areas of the province, agriculturally productive soils require installing drains to reduce risks of compaction, surface runoff or erosion. OFA would like to see the final Soil Strategy clarify how soil drainage fits into the overall Strategy itself, and into the Proposed Actions to improve soil health.

In our previous comments on the Soil Strategy Discussion Paper, we identified changing nature of land tenure in Ontario land rental as a one of our greatest concerns with regards to soil health and conservation. 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 investment in these activities might be unattractive and improbable if the term of the farmland lease is too short. To address this, the Soil Strategy could investigate options to incentivize landlords to offer longer-term leases on the land they are renting to farmers.

Page 7 of the Draft Strategy states “Many of the tillage and cropping practices employed on Ontario farms are considered unsustainable...” Given the variability of soils in Ontario and the variability of conditions farmers encounter, it would be more appropriate to change “many” to “some”.

OFA appreciates the opportunity to comment on the Draft Soil Strategy. We support many of the Proposed Actions in the Draft Strategy and have indicated our concerns above. We look forward to continuing to work with OMAFRA and the agricultural sector to develop the Ontario Soil Health Partnership to drive the implementation forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Currie', written in a cursive style.

Keith Currie
President

cc: OFA Board of Directors