

February 22, 2019

Mr. Greg DeVos, Senior Policy Advisor
Food Safety and Environmental Policy Branch
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Mr. Greg DeVos,

Re: ERO # 013-4388: Proposed regulatory amendments to Ontario Regulation 267/03 under the Nutrient Management Act

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

The OFA is pleased to have this opportunity to provide comments on ERO #013-4388 - Proposed regulatory amendments to Ontario Regulation 267/03 under the Nutrient Management Act.

The OFA is supportive of the proposed changes to the renewal requirements of a Nutrient Management Strategy (NMS) as a red-tape reduction measure. We are pleased that the Ontario government recognizes that requiring farmers to renew a NMS every five years does not provide any enhancement to environmental protection when there have not been changes to the operation or its activities. This will result in administrative savings to the government, as well as savings to the producer. Meanwhile, the environmental integrity of the Act is maintained by the existing requirement for producers to review their NMS and maintain up-to-date records on an annual basis.

However, this same rationale that supports the removal of the cessation of a Nutrient Management Strategy also applies to a Nutrient Management Plan. Requiring a 5-year renewal of Nutrient Management Plans for an operation that has not seen any changes also does not add to any increase in environmental protection. The only impact of requiring this renewal is to add administrative and financial burden to farmers. **Therefore, OFA recommends that the removal of the cessation for a Nutrient Management Plan also be included in these proposed changes.**

In addressing red-tape reduction, there are additional non-regulatory changes that would facilitate reporting by producers. One such suggested change is to amend the current process to allow for pre-populating the Nutrient Management Act records with information that farmers have already

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supplied would ease the paper-work burden. (NMA). Under the existing process, farmers are required to enter all of their existing information that has already been supplied under the NMA. There are also opportunities to consolidate outreach to farmers. For example, producers currently receive several notices from government regarding their farm business over the course of a year. Rather than having producers receive multiple separate notices from various government programs and having to complete similar or identical information on each notice, there is an opportunity for the different program areas mailing or e-mailing these notices to work together and combine notices. **Therefore, OFA further recommends that both the Ministries of Agriculture, Food and Rural Affairs, and the Ministry of Environment, Conservation and Parks work with the agricultural sector to find similar efficiencies that work for the government while reducing the burden on the agricultural sector businesses.**

Further in this posting is the proposal to re-categorize low-risk manures from non-farm grazing animals as a Category 1 NASM. This proposed amendment would apply to businesses and agricultural operations looking to utilize these manures as a crop nutrient. This manure would still be subject to the Category 1 NASM land application rules. OFA is in favour of the proposed NASM category change for non-farm grazing animals.

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

Sincerely,



Keith Currie
President