

September 4, 2019

Ms. Carolyn O'Neill  
Great Lakes Office  
40 St Clair Avenue West  
Floor 10  
Toronto, ON M4V1M2  
[glo@ontario.ca](mailto:glo@ontario.ca)

Dear Ms. O'Neill,

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 #019-0198: Proposed New Canada-Ontario Agreement on Great Lakes Water Quality and Ecosystem Health.**

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 resources management is important. Because of this daily interaction with the environment, we are pleased to see that agriculture is specifically included as part of the Great Lakes Community under this proposed Canada-Ontario Agreement (COA).

The definition of "Sustainability" in this document stresses the need to consider equally social, economic, and environmental demands and considerations. It will be important to ensure this principle remains throughout implementation of any initiatives.

Implementation of both COA and the initiatives coming out of this agreement, including the Lake Erie Action Plan (LEAP), will require considerable resources. OFA is pleased to see that this proposed agreement requires the Parties to provide "the resources needed to implement the Agreement and the Annexes...". It is essential that these resources, which must include real dollars, are made available to the people implementing on-the-ground projects.

OFA is pleased to see that Result 4 of Annex 1: Nutrients recognizes that actions taken on agricultural operations must be "consistent with a sustainable and competitive agricultural sector." Ensuring the competitiveness of the agricultural community while making progress with reducing the risk of excess nutrient loss is critical to success in this area. It also recognizes the strong leadership of the agricultural sector. OFA would like to stress that this leadership has been effective in large part due to the sector's access to funded, voluntary programs and initiatives which have very positive uptake in this sector.

The proposed new COA mentions reviewing Ontario's agricultural drainage management "using an integrated watershed approach." It is essential that the agricultural community is directly involved with any and all discussions regarding agricultural drainage.

OFA urges continued communications with the agricultural community as more details or new initiatives arise from the Canada-Ontario Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", enclosed within a thin black rectangular border.

Keith Currie

cc      OFA Board of Directors