

June 15, 2020

Mr. Jack Gibbons, Chair  
Lake Simcoe Watch

Via Email: [jack@lakesimcoewatch.ca](mailto:jack@lakesimcoewatch.ca)

Dear Mr. Gibbons,

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.

OFA welcomes the opportunity to provide our input into Lake Simcoe Watch's "Cleaning-Up Lake Simcoe: A Discussion Paper". 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.

**1. Do you support Lake Simcoe Watch's recommendation that the Government of Ontario should develop a plan to reduce Lake Simcoe's phosphorus pollution to 44 tonnes per year by 2026? If no, do you support the achievement of the 44 tonne per year target by a later date? If yes, please specify the date.**

OFA supports the reduction of phosphorous to 44 tonnes per year. However, the original plan to reduce phosphorous to this level by 2045 was deemed to be an aggressive target. Setting this target to be achieved by 2026 will likely be setting the plan up for failure. Therefore, OFA supports the original time frame for phosphorous reduction.

**2. Do you support Lake Simcoe Watch's proposed actions to reduce Lake Simcoe's phosphorus pollution? If no, please explain why not and outline alternative actions that you believe should be taken to reduce Lake Simcoe's phosphorus pollution.**

OFA has a long history of supporting the development, review and voluntary implementation of BMP supported by cost-share programs. The greater issue will be ensuring adequate cost-share dollars to support farmers with these initiatives. The implementation of BMPs by a farmer must also remain voluntary.

OFA does agree with OSCIA's comments regarding the challenges of water course naturalization and large buffer strips. OFA believes that there are other effective means of reducing phosphorous loadings without removing large tracts of agricultural land from production. For these reasons, OFA is not supportive of this approach on agricultural lands.

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It must also be noted that Table 1: Phosphorous Reduction Efficiencies of Agricultural BMP's is misleading. The term "efficiencies" should be defined for this purpose as well as a context for these numbers. Assuming that an 85% reduction in agricultural phosphorous is achievable through these BMPs seems aggressive.

It remains important to look at other sources of phosphorous into the lake as well. Given the extraordinary urban development in the watershed, phosphorous loads from this development must be accounted for. Looking into urban stormwater and septic systems within the Lake Simcoe basin is necessary. It would also be interesting to determine how much of the existing phosphorous is legacy phosphorous. This was an important consideration that appears to have been missed in early calculations and is critical to understanding phosphorous levels in Lake Simcoe.

**3. Do you agree that the Development Charges Act should be amended to permit the Government of Ontario and Lake Simcoe municipalities to levy development charges to recover 100% of their costs of reducing Lake Simcoe's phosphorus pollution? If no, please explain why not and outline how you believe the pollution reduction measures should be paid for.**

OFA does not support changes to the Development Charges Act for this purpose. The purpose of this act is to cover capital costs associated with new development. While we understand the need to fund the costs of reducing Lake Simcoe's phosphorous loads, we do not believe that changes to the Development Charges Act are appropriate.

Thank you for the opportunity to provide our comments.

Sincerely,



Keith Currie  
President

cc: OFA Board of Directors