

March 2, 2021

Submitted online and via email: LakeSimcoe@ontario.ca

To whom it may concern,

Re: ERO # 019-2833: Lake Simcoe Protection Plan 10-year Review

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is pleased to have this opportunity to comment on the Lake Simcoe Protection Plan 10-year Review. It is our opinion that updates do not need to be made to the Lake Simcoe Protection Plan at this time. As it states in the Minister's 10-Year Report on Lake Simcoe, "the current programs are adaptable to changing conditions in the watershed and new information." Given the many successes and improvements described along with the adaptability of the Plan, OFA believes the Plan continues to work as intended.

From an agricultural perspective, the report describes the work done by farmers, including implementation of Best Management Practices and participation on research projects. "Between 2004 and 2017, over \$26 million was invested on 1,248 unique environmental projects. Projects were completed on 376 farms... These farms collectively invested \$15 million of their own money with an additional \$11 million in government cost-share funding." OFA recommends continued investment by government in these voluntary endeavours to continue the good work that has already been demonstrated. Providing enhancements to specific applied research, such as the work carried out by the Muck Research Station for example, will also provide great value.

We are happy to see the continued involvement with urban and non-farm sources of phosphorus into Lake Simcoe as well. Given the increasing urbanization of the watershed, it will remain essential to ensure phosphorus from these sources is not increasing.

This report identifies addressing invasive species as a priority of the Plan, including reference to Zebra and Quagga mussels. However, what appears to still be lacking is the impact of these mussels on both the phosphorus mobilization and levels in the lake. This is an issue OFA raised in our 2010 response to the Lake Simcoe Protection Plan. We believe that significant factors relating to the state of the lake were not considered in early studies that resulted in calculating phosphorus contributions to lake, specifically legacy phosphorus, and the role of invasive species. For example, the studies did not attribute any phosphorus in the lake to the impact of wave action on stirring up phosphorus in the sediment of the lake. Studies should begin that looks at the issues of legacy phosphorus in the Lake sediment, how it is mobilized and attempt to quantify this phosphorus source.

As stated in the 10-year Review, “this report demonstrates that our efforts to protect the lake are working, and we are making progress towards the objectives of the Lake Simcoe Protection Act and plan.” Revisions to the Plan are not necessary at this time given the progress seen to date and the inherent adaptability embedded within the Plan. However continued success will require continued investment and support.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors