

July 28, 2021

Naomi Horst
Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West
Ontario Government Building, 2nd floor, Southwest
Guelph, ON N1G 4Y2

Sent via email to: naomi.horst@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Naomi Horst,

Re: ERO 019-3849 Nutrient Management Act Further Burden Reduction Opportunities

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to provide comments on: ERO 019-3845 Nutrient Management Act Further Burden Reduction Opportunities. OFA is supportive of the government's priority to cut red tape and remove regulatory burdens on businesses, leading to job creation and revenue generation, and allowing businesses to thrive

OFA is in favour of the proposal to remove the automatic five-year expiration associated with the Agricultural Operation Planning (AOP) certificate. We appreciate that this will reduce the costs and training burden to farmers who prepare their own Nutrient Management Strategies and/or Plans. We trust that there will be adequate guidance materials and resources available to assist AOP farmers as needed. This material must also be easily accessible and accommodate farmers with limited ability to access the internet.

This proposal also calls for housekeeping amendments to the Nutrient Management Protocol. Unfortunately, these proposed draft amendments were not disclosed in this consultation posting. We recommend that the draft amended Protocol be made available to OFA and other agricultural organizations for review prior to finalization, to ensure that the document remains useful to the end users, which includes farmers.

OFA encourages the government to seize additional opportunities to further reduce burdens with respect to the Nutrient Management Act. OFA welcomed July 1, 2019, Nutrient Management Regulation amendments that removed the automatic five-year expiration associated with a

Nutrient Management Strategy (NMS). However, the Nutrient Management Plan (NMP) cessation requirement has persisted.

We have reiterated many times our request for the removal of the five-year Nutrient Management Plan (NMP) cessation when there have not been any substantial changes to the farm operation. This is a costly regulatory burden faced by Ontario Farmers. Currently, a NMP expires after five years and a farmer must have a new NMP prepared, even if the operation has not undergone any significant changes to the nutrients. The new plan must be reviewed and approved by government staff. This process adds very little, if any, value to environmental protection when the NMP does not require any changes. However, it does add compliance costs to farmers as well as regulatory administration costs for taxpayers. There are other, more effective, means of ensuring the environmental protection of an NMP without the administrative costs to both the farmer and the government.

OFA strongly recommends the removal of the five-year Nutrient Management Plan (NMP) cessation trigger when there have not been any substantial changes to the farm operation be included in the government's decision with respect to ERO 019-3849 - Nutrient Management Act Further Burden Reduction Opportunities.

We trust our opinions and recommendations will be given due consideration in this consultation and look forward to ongoing consultation and discussion.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
The Honourable Dave Piccini, Minister of Environment, Conservation and Parks
OFA Board of Directors