

January 30, 2023

Sarah Fleischhauer
Food Safety and Environmental Policy
1 Stone Road West, 2nd Floor
Guelph, ON
N1G 4Y2

Submitted online and sent via email to: sarah.fleischhauer@ontario.ca

Dear Sarah,

Re: ERO 019-6404: Proposed changes to Tables 1 and 2 of the Nutrient Management Protocol incorporated by reference into O. Reg 267/03 made under the Nutrient Management Act, 2002

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 administered by all levels of government. OFA is passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

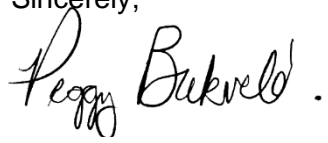
This consultation proposes to update values found in the Nutrient Management Tables 1 and 2 of the Nutrient Management Protocol, to help ensure that these values remain up-to-date and reflect current industry values.

We will leave comments regarding specific changes to the values within the Nutrient Management Tables regarding nutrient unit livestock information and the manure databank, to the respective commodities. However, in general, we support the periodic review and update of these values to reflect new scientific data and changes in industry practice.

We are very disappointed that our many requests for the removal of the five-year Nutrient Management Plan (NMP) cessation when there have not been any substantial changes to the farm operation, has not yet been addressed. 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.

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

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive style with a period at the end.

Peggy Brekveld
President

cc: OFA Board of Directors