

August 25, 2023

Freshwater Management – Ontario Division
Great Lakes Harmful Pollutants Section
Environment and Climate Change Canada
867 Lakeshore Road, Burlington, ON L7R 4A6

Sent via email to: greatlakes-grandlacs@ec.gc.ca

Dear Freshwater Management – Ontario Division,

Re: Assessing phosphorus targets for Lake Ontario

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are 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.

OFA appreciates the opportunity to provide our comments on the science task team's assessment of Lake Ontario's interim phosphorus targets under the Canada–U.S. Great Lakes Water Quality Agreement. We understand that input received will be considered in the development of a final recommendation on targets for Lake Ontario.

OFA welcomed the GLWQA Nutrients Annex's establishment in 2020 of a science task team for Lake Ontario to assess the lake's interim phosphorus targets and determine whether they should be revised.

OFA believes that actions to address excessive nutrients in any of the Great Lakes must be science evidence based. This includes recognizing and accounting for the delays in response time from the introduction of management practices to observing nutrient reductions in the lakes. **We are also supportive of the use of voluntary measures that are accompanied by cost-share dollars if management activities are ever identified for agricultural practices, along with consultation with the agricultural community.**

OFA is in support of the recommendations and next steps for Lake Ontario nutrients contained in the science task team's assessment. The recommendation is that "the Nutrients

Annex does not recommend a revision of the Lake Ontario phosphorus targets, at this time.” Next steps for 2023-2025 Science and Action include continuing monitoring, updating estimates of annual phosphorous loads to the lake, and identifying locations where management actions may be needed to address nearshore algae issues in Lake Ontario.

Thank you for the continued opportunity to provide our input from an agricultural perspective. We look forward to our ongoing dialogue to ensure phosphorus targets are achieved.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors