



Honourable Glen Murray
Minister of Environment and Climate Change
Ferguson Block
11th Floor
77 Wellesley St West
Toronto ON M7A 2T5

April 16, 2015

Dear Minister Murray,

Please find attached Grain Farmers of Ontario's comments on the Great Lakes Protection Act.

Grain Farmers of Ontario supports the need to protect and restore the ecological health of the Great Lakes and is committed to being a part of the solution to ensuring the Great Lakes remain "drinkable, swimmable and fishable." We recognize the importance of environmental stewardship and our role in ensuring the proper use of fertilizer.

Grain farmers often cite burdensome regulation as their main business concern and a significant factor in innovation and growth, grains and oilseed farmers are trade sensitive sector and all regulations need to ensure our farmer members can remain competitive. We are concerned that Bill 66 is duplicative legislation and that the goals of Bill 66 can be achieved through existing legislation.

Bill 66's specific targets to address algal blooms in Lake Erie are an example of duplication; the US/Canada Water Quality Agreement will set and implement targets to address algal blooms. There is a role for agriculture to attend to nutrient use and that is why we have partnered with the Ontario government on the 4R Nutrient Stewardship MOU to look at a voluntary program to increase the efficient use of fertilizer and contribute to the goals of the Water Quality Agreement.

Sincerely,

Mark Brock
Chairman

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Grain Farmers of Ontario Submission
Bill 66 - Great Lakes Protection Act
EBR Registry #012-3523

Who we are

Grain Farmers of Ontario is Ontario's largest commodity organization. We represent 28,000 corn, soybean, and wheat family farmers. Ontario's grain and oilseed crops cover 5 million acres of farm land and are one of Ontario's largest agricultural industries, producing food and energy while contributing environmental and economic benefits for Ontario.

Ontario's grains and oilseeds are an important contributor to Ontario's economy and environment.

- 53,000 full time jobs in the province and \$9 billion in economic output annually
- Grains and oilseed crops are a foundation for the agri-food, bioenergy and livestock industries
- Ontario is the corn and soybean capital of Canada and home to Canada's largest bio-refineries

Overview

Great Lakes and St. Lawrence Seaway Basin are important part of Ontario's environment and protecting the environment is a priority for grain farmers across Ontario.

Bill 66, represents a number of concerns for the Grain Farmers of Ontario:

- Grain farmers are subject to a number of statutes that can address the areas covered in the Great Lakes Protection Act.
- Terminology and measurement techniques within the Act rely on subjective not quantitative scientific evidence based analysis
- The appointments process and oversight of the Guardians Council
- The inclusion of targets to address algal blooms which is already being addressed by the Water Quality Agreement
- The absence of a specific emphasis on the impact of Bill 66 on agriculture and its continued need to remain competitive

Background

Duplicate Regulatory Environment stifles farm growth and innovation

Grain farmers in Ontario, often cite regulatory burden as a significant issue when adopting innovation and building growth. It is important for the Ontario government to ensure a smart regulatory approach that does not duplicate existing legislation. Bill 66, the Great Lakes Protection act, provides no additional legislative tools to deliver on the Great Lakes Strategy.

The following statutes exist to deliver on the Great Lakes Strategy:

- Environmental Protection Act (EPA);
- Ontario Water Resources Act (OWRA);
- Nutrient Management Act (NMA);
- Pesticide Act;
- Clean Water Act;
- Drainage Act;
- Lakes and Rivers Improvement Act
- Endangered Species Act; and
- Planning Act and associated Provincial Policy Statements.

Terminology and measurement tools absent science

The following terms lack adequate definition and are troubling terms for determining science based regulations:

- Ecosystem Approach,
- Precautionary Approach, and an
- Adaptive Management Approach.

The use of a “precautionary approach” is not based on scientific principles or scientific evidence. The approach often results in decisions made popular opinion rather than science and data that shows evidence. Regulations in Ontario must be contemplated and developed based on scientific principles and evidence. These regulations also need to take into account the users ability to deliver, if grains and oilseed farmers are no longer competitive due to regulatory burden then they will be unable to adopt innovations that contribute to the environment or help grow the economy.

Grain Farmers of Ontario’s commitment to Efficient Fertilizer Use

– 4R Nutrient Stewardship

The nutrient issues facing Great Lakes water quality can be improved with voluntary actions in agriculture as part of the solution.

Grain Farmers of Ontario supports the need to protect and restore the ecological health of the Great Lakes and is committed to being a part of the solution to ensuring the Great Lakes remain “drinkable, swimmable and fishable.” We recognize the importance of environmental stewardship and our role in ensuring the proper use of fertilizer.

Ontario has been a leader in encouraging farmers to use nutrient management plans in crop production. 4R Nutrient Stewardship is a recognized part of the Ontario Government’s strategy to reduce nutrient runoff in the Great Lakes and St. Lawrence River basin. The province has embraced 4R Nutrient Stewardship as an important tool to meeting the province’s agricultural and environmental goals through recent publications such as The Phosphorous Primer and the Soil Fertility Handbook.

Additionally, the International Joint Commission’s Lake Erie Ecosystem Priority released its report in 2014, which provided recommendations on reducing phosphorus levels in the basin. Among these recommendations, 4R Nutrient Stewardship was identified for accelerated implementation in Ontario as an important opportunity to improve fertilizer use in the watershed and increase water quality:

“The 4R program -- the right fertilizer source, right rate, right time and right place – provides a useful framework for guiding fertilizer application in the Lake Erie Basin and beyond. The 4Rs can be effective in reducing nutrient export from fields, while meeting plant nutrition needs and therefore maximizing crop yields.” -- International Joint Commission (2014). A Balanced Diet for Lake Erie: Reducing Phosphorus Loadings and Harmful Algal Blooms.