



LONG-TERM THINKING FOR TODAY'S ISSUES

July 30, 2021

Attention: Naomi Horst
Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West
Ontario Government Building,
Second Floor, Southwest
Guelph, ON N1G 4Y2
Via email: naomi.horst@ontario.ca

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

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO welcomes efforts by the government to reduce burdens of costs and time for farm operators relating to renewing Agricultural Operation Planning (AOP) Certification. The CFFO recommends removing the requirement for Nutrient Management Plans (NMPs) to expire after five years. The CFFO emphasizes the importance of continuing to have certification training available for farm operators. The CFFO also requests that information designed for use by AOP-certified farmers be available online and in person in order to help them update Nutrient Management Strategies (NMSs) and in preparing NMPs as required. The CFFO also supports efforts to update, simplify and clarify language in the Nutrient Management Protocol.

Proposal to Reduce Administrative Burden

The CFFO supports the Ministry's goal to reduce burden and costs for farm businesses by removing the requirement for AOP Certificates to expire after five years. Removal of this requirement makes sense, since the requirement for NMSs to likewise expire five years after being completed/approved has already been removed.

However, NMPs still expire five years after being completed/approved. The CFFO recommends removal of the requirement for NMPs to expire after five years as well.

It is important that farm operators still have reasonable access to both the online and in-person training options to complete a new AOP certification. Interested operators should also have the option to voluntarily participate in these training courses to keep themselves up to date and help in the annual update of NMSs and preparation of NMPs as required. Information should also be readily available

online, designed for use by this farm-operator audience, to help guide the updates for NMSs and the preparation of NMPs by those holding AOP certification.

Proposal to Simplify Rules and Streamline Processes

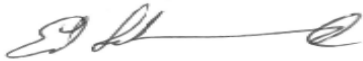
The “Further Burden Reduction Opportunities Discussion Paper” also proposes to update The Nutrient Management Protocol in order to reflect amendments to the regulation, fix broken web links and clarify some requirements (p. 2-3). However, no further details are provided on the particular housekeeping changes that are proposed to be made. The CFFO is supportive of the need to keep the Protocol updated, clear and easy to understand as well as to keep associated resources up to date.

Conclusion

The CFFO supports government efforts to reduce red tape for farm operators relating to AOP certification and to update, simplify and clarify language in the Nutrient Management Protocol. We recommend removing the requirement for Nutrient Management Plans to expire after five years. We also emphasize the importance of keeping resources, online and in-person, available to support farmers in meeting the requirements for both Nutrient Management Strategies and Nutrient Management Plans in order to maintain the intended environmental protection set out in the *Nutrient Management Act, 2002*.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario