



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

December 31, 2017.

Attention: Paul Smith
Senior Policy Advisor,
Ministry of Agriculture, Food and Rural Affairs,
Policy Division
Food Safety and Environmental Policy Branch
Floor 2
1 Stone Road W,
Guelph, ON
N1G 4Y2

Re: EBR 013-1373 – New Horizons: Draft Agricultural Soil Health and Conservation Strategy for Ontario

Dear Paul Smith,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in the province of Ontario.

Good soil stewardship on farms is foundational to the success of farming families, to the health of the agricultural sector as a whole, and has many benefits for society at large as well. This vital resource rewards good management, and can suffer significantly from poor management practices. While farmers work to be good stewards of the soil, there are many factors that impact how agricultural soils across the province are managed.

New Horizons: Ontario's Draft Agricultural Soil Health and Conservation Strategy recognizes that healthy soil is foundational to so many aspects of our society. Initiatives through this strategy should be aimed to consider all the benefits that can be derived from healthy soil, including the positive impact this has on the quality and quantity of the food it produces, water quality, sequestration of greenhouse gases and wider biodiversity, including soil biodiversity, as well. Initiatives through the Strategy should also recognize the significant contribution farmers make through their soil stewardship efforts.

The Soil Strategy needs to recognize both the good work farmers are already doing, and build on the successful programs and organizations that are already doing excellent work to improve soil health. It also needs to recognize the role that government can play, especially in supporting research, monitoring and modeling, and in funding proper up-to-date soil mapping. Government support for stewardship programs does help encourage greater participation and rewards and assists those farmers who are working towards positive change.



Key Recommendations

Below we outline those actions we would strongly support and encourage for early action on the part of government. In addition to our support for these and other actions in the Draft Strategy, we have the following recommendations that we feel were not sufficiently considered in the actions already proposed:

1. Support for on-farm trials should connect feedback from farmers to the research and extension communities.
2. Knowledge and Innovation should include actions specifically aimed at collecting feedback and data *from* farmers that goes *to* the research and extension communities.
3. Research on barriers to BMP adoption needs to consider the impact of other government policy which might hinder easy adoption.

Soil Management

Of the four key objectives outlined in the strategy, soil management is the most important. The other three are vital supports for effective soil management on farms. It is important to recognize that Ontario farmers are already actively working to improve soil stewardship. Farmers do this through individual entrepreneurial on-farm efforts, through the work of farm organizations and industry led initiatives, with the expertise of agronomists and CCAs and the research, extension and cost share support of government and related organizations such as conservation authorities and agricultural universities.

Expanded Funding

The GLASI program and the Farmland Health Checkup available in western Ontario, as well as the Soil Health Checkup available in the Lake Simcoe region offer valuable education, extension and funding to support farmers in their efforts to improve soil health and reduce nutrient losses. These programs need to be sufficiently funded in the long-term to ensure that they continue to provide this effective support for farmers in these sensitive regions.

The CFFO also strongly supports the proposed action to expand availability of similar programs to other regions of the province, hopefully with the goal to have such programs available in all areas of the province with active farming within a designated timeline such as 5 years.

BMP Adoption

Good management practices are varied and need to be adapted to the situation of each individual farm and farm business. While literature and research on BMPs is valuable,



this needs to be accompanied by sufficient extension capacity, public and private, for consultation with farmers on what will work best in their individual situation on their farm landscape, and within their farm business.

The CFFO is in favour of proposed support for on-farm trials and proof-of-concept projects and innovation grants to try out and demonstrate new practices by farmers. These proposed actions would nicely connect with the desire expressed under *Knowledge and Innovation (K&I)* to “gather feedback from farmers who try new methods of production based on research results...fostering a strong communications loop.” However, the actions under the K&I section do not clearly address how feedback from farmers such as these might be better collected and shared with researchers as well as fellow farmers and extension staff. As part of this proposed action, the CFFO recommends that consideration of collection of feedback *from* farmers *to* the research community be considered, and that peer-to-peer and extension staff learning opportunities from such projects should also be considered.

Growing markets for crops suitable for expanding crop rotations is an important way to help address a significant hurdle to adoption of this important BMP for soil health. However, expanding crop rotation will also demand more management and equipment for farmers to incorporate this BMP.

As government and researchers continue to identify barriers to the adoption of BMPs, they need to also act on potential solutions to better facilitate adoption. The CFFO recommends that an adaptive approach be taken which will work to continually address barriers to BMP adoption as research reveals ways to address inhibiting factors.

As part of this research on BMP adoption and possible barriers, policy barriers that may impede adoption should be considered. Looking, for example, at the recommendation to increase application of organic soil amendments, policy regulations which make it difficult to add or expand livestock farming, or which impact capacity or availability of abattoirs or on farm processing should be considered for their possible impact on this BMP and on soil health in general. This principle applies for other key recommendations as well.

Soil Data and Mapping

Soil Data and Mapping is a theme where government clearly has a leading roll to play. Soil type mapping and land suitability classification systems are best established and maintained by government. The CFFO strongly encourages government to push ahead with updating the provincial soil maps in all arable regions of the province, and, as it becomes complete, to have this data available in an electronic format that is useful for all users, including farmers, extension personnel, and policy makers.



519-837-1620

Toll-Free:

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

However, beyond soil types and land suitability classification, there is significantly more data on soils that can be useful both for farmers and policy makers in decision-making. This data is of interest at different scales to different decision-makers, as the Strategy recognizes.

The CFFO supports further exploration of methods to encourage sharing of data in a way that will protect privacy while allowing policy makers to access important soil data for evidence-based decision-making. The level of detail required for policy making is at a regional or even provincial level. This means that aggregation of data, keeping individual information private, should be suitable. In order to encourage farmer willingness to participate and share data, it will be important to ensure that willing farmers do not experience any negative consequences (such as punitive action) and that farmers can also benefit, such as providing feedback on how their soil tests measure up against the broader trends in their region.

One cannot measure progress without clearly established baselines and ongoing monitoring of changes. The CFFO encourages early action on compiling and analyzing the current available government data, and then initiating a project to further research current soil-related practices and establish baselines. These are important foundational steps before ongoing soil evaluation and monitoring can meaningfully take place.

Soil Evaluation and Monitoring

Allowing farmers themselves to more easily do a basic soil health assessment will put more power in the hands of those working on the front lines of soil health. Since good soil health provides so many benefits including for farm profits, for the broader environment (such as water and air quality) and most importantly for food production, this is an important priority action.

At a government scale, the CFFO also supports early action on working with AAFC to refine their already established indicators at a more detailed provincial/regional scale. This is a wise use of available and established resources.

Soil Knowledge and Innovation

It is excellent to read the emphasis within this theme on the importance of investing in the *people* who hold, generate, and share knowledge about soils and soil health. These include farmers familiar with the land, especially soil health champions, researchers, teachers and others within the formal education system who generate and pass on new understandings of soil health and extension staff who help develop concrete plans for soil health BMPs and projects specific to their clients' farm landscapes and businesses.



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

As mentioned above, all the actions proposed under this theme are focused on top-down knowledge sharing from the research community to the farmers. While this is vitally important, feedback communication from farmers and extension staff back to the research community is also important, and some actions designed to accomplish that should be added.

In particular, note our recommendation in the section on *Soil Management* above that support for on farm trials should include feedback to the research community, as well as to peers and extension staff, in order to better complete the communication loop.

While ongoing support for established and new efforts focused on face-to-face learning and training opportunities is important, new internet based communication tools also need to be established to reach a new and younger audience with important messages and innovation on soil health.

Summary

The CFFO recognizes that good soil stewardship is foundational to human health and prosperity, as well as the health and prosperity of the broader environment, including water and air. Many important and constructive actions have been proposed in *New Horizons: Ontario's Draft Agricultural Soil Health and Conservation Strategy*. Throughout our comments above we have highlighted several of the actions we feel should be prioritized for early action.

In addition, we have identified that there needs to be clear emphasis on collecting knowledge and feedback *from* farmers *to* researchers to complete the communications loop. Also, government needs to consider the soil health implications of other regulations that impact adoption of BMPs.

Strong government, research and extension support is important, but in the end, it will be primarily farmers on the front lines of soil health improvements across the province. Through their good stewardship, all of society benefits. It is, therefore, vitally important that society, through and beyond government, support the stewardship work of farmers as much as possible.

Thank you for this opportunity to provide our input.

Sincerely,

Clarence Nywening, President

Christian Farmers Federation of Ontario