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[www.christianfarmers.org](http://www.christianfarmers.org)



642 Woolwich Street,

Guelph ON, N1H 3Y2

February 28, 2018.

McKenzie Smith  
Audit Coordinator  
Fertilizer Canada  
350 Sparks St.  
Suite 907  
Ottawa, ON  
K1R 7S8

Dear McKenzie Smith,

### **Proposed 4R Nutrient Stewardship Certification Standards**

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

The CFFO has been pleased to participate in the process of bringing 4R Nutrient Stewardship to Ontario by having a representative serve on the 4R Nutrient Stewardship Steering Committee. Through this representation, we as an organization have already made a contribution to the development of these proposed standards.

As part of this consultation, review of the proposed draft standards by the broader membership further confirms our support for the concept of 4R Nutrient Stewardship (right source, right rate, right time and right place), as well as support for the specific certification standards that have been proposed. In this letter, we add further comments from our broader leadership and membership on the proposed draft.

The CFFO recognizes that the 4R Nutrient Stewardship program is a certification program aimed not at farmers, but at Nutrient Service Providers. Effort has been made in the proposed regulations to take into account practices in Ontario, including accounting for the use of manure in nutrient recommendations, as is especially highlighted in R5 and R8. However, overall, the recommendations are primarily focused on managing purchased inputs such as commercial fertilizers.

The CFFO recommends that still further strides need to be made to ensure that the 4R Nutrient Stewardship principles and recommendations are also available for farmers using primarily or only manure or other sources of nutrient beyond fertilizers. In particular, Nutrient Service Providers participating in this program should be encouraged to offer separate services suitable for these farmers, so that they can also benefit from the training and recommendations of CCAs certified within this program in helping them to manage their nutrient use most effectively on their farms. Furthermore,

**THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES**



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limitations such as the calibration of equipment (as is required in A6) for solid manure should not prevent such farmers from participating as certified acres under the program.

The CFFO is strongly in favour of bringing the 4R Nutrient Stewardship certification program to Ontario, and supports the certification recommendations that have been proposed. We further encourage Nutrient Service Providers, through this program, to provide separate services for all farmers to ensure they have access to the benefits of this nutrient management system on their farm, and to ensure the maximum benefit to our waterways and water quality as a result of the good management practices that this program promotes.

We appreciate this opportunity to respond to these proposed certification standards for the 4R Nutrient Stewardship program in Ontario, and thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario  
SA