



LONG-TERM THINKING FOR TODAY'S ISSUES

January 23, 2023

Attention: Sarah Fleischhauer
Food Safety and Environment Policy
Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road W, 2nd Floor
Guelph, ON
N1G 4Y2
Via email: sarah.fleischhauer@ontario.ca

Re: ERO 019-6404 Proposed Changes to Tables 1 and 2 of the Nutrient Management Protocol incorporated by reference into O. Reg 267/03 made under the Nutrient Management Act, 2002

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 recognizes the importance of keeping the information in Tables 1 and 2 of the Nutrient Management Protocol up-to-date and reflective of current practices and conditions. **The need for many of these changes indicate the improvements in efficiency that agriculture has made over the intervening two decades, which is worth noting and recognizing.**

The CFFO supports the changes proposed to Table 1 and Table 2. With these changes, the tables will more accurately reflect current practices and animal weights. The CFFO supports maintaining these tables with up-to-date information on a regular basis.

Because these tables have not been updated in two decades, it is important that the changes do not result in significant variance in compliance obligations or new costs to farmers. In any instances where these changes result in significant variance in on-farm compliance obligations, farmers need to be given reasonable time to come into compliance.

Conclusion

The CFFO supports keeping Table 1 and Table 2 of the Nutrient Management Protocol up-to-date and supports the updates currently proposed. Farmers should not be burdened with any additional costs because of these updates. Farmers should be given time to come into compliance where these changes result in the need for significant adjustments to on-farm practices.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Scharringa', with a long horizontal flourish extending to the right.

Ed Scharringa, President
Christian Farmers Federation of Ontario