



ENVIRONMENTAL COLLABORATION ONTARIO

Growing good things—together!

September 4, 2019

Ms. Carolyn O'Neill
Great Lakes Office
40 St. Clair Avenue West 10th Floor
Toronto, ON M4V1M2
glo@ontario.ca

Dear Ms. O'Neill,

Environmental Collaboration Ontario (ECO-Ag) is a collaboration of provincial agriculture organizations that recognize the need to provide innovative and transformational leadership to enhance environmental outcomes and support good business, a healthy environment and strong communities. More information about ECO-Ag can be found at www.environmentalcollaborationontario.ca.

As an active participant in a number of Great Lakes improvement activities, including the Agriculture Sector Working Group and the Canada-Ontario Lake Erie Action Plan (CO-LEAP), ECO-Ag appreciates this opportunity to provide comments on the proposed new Canada-Ontario Agreement (COA) on Great Lakes Water Quality and Ecosystem Health (ERO #019-0198).

The proactive efforts of government to address the significant challenges facing the Great Lakes is appreciated by Ontario's agricultural stakeholders. As farmers, we rely on air, soil and water to produce food and bioproducts for consumers. Farmers are integral partners in managing the natural environment and have a vested interest in the sustainability of these resources. ECO-Ag is pleased to see that agriculture is specifically included as part of the Great Lakes community under the proposed COA.

The December 2019 expiration of the current COA presents an opportunity to re-evaluate priorities and identify ways to improve Great Lakes water quality as efficiently as possible. ECO-Ag agrees with many of the proposed actions under the Nutrients Annex of the new COA, namely: implementing actions regarding the CO-LEAP; supporting intermediate assessments and report of progress regarding phosphorus and nutrients to determine progress; continuing focus on Lake Erie priority watersheds; providing access to funding programs that effectively help manage or mitigate nutrient issues; and maintaining and increasing use of science-based and numeric reduction targets.

ECO-Ag is particularly supportive of the increased dedicated focus on agricultural production and including sustainability and competitiveness considerations, access to tools, education and demonstration opportunities, and technical advice, which has been included in Result 4 of Annex 1. Competitiveness of Ontario agriculture needs to be considered as a key principle throughout the life of the agreement and implementation of any initiatives.

We do believe however that there are some aspects missing from the proposed COA, namely: a lack of focus on areas with higher nutrient contributions to achieve results efficiently and economically; explicit mention of Conservation Authorities and their Source Water Protection mandate; and inclusion of groundwater as a separate consideration, as it is an important aspect



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of Ontario's water system. In addition, while it is positive that the COA includes a climate change impact assessment, as agriculture will be uniquely impacted by climate change, we feel that a specific section for agriculture and climate change is warranted.

We are pleased that the proposed COA explicitly mentioned the continuation of implementing CO-LEAP, convening regular binational Great Lakes Public Forums, delivering the Great Lakes Protection Initiative, and maintaining the EcoAction Community Fund. Programs like these are essential to facilitate awareness and action to improve the Great Lake.

It is important that resource contributions continue to provide real financial support for implementing on-the-ground projects including coordinated research and monitoring programs to increase sophistication of available data. This will help ensure that policies, programs, funding and reduction activity can be targeted to priority watersheds, and evaluate the success of new and existing nutrient management programs.

The proposed new COA mentions reviewing Ontario's agricultural drainage management "using an integrated watershed approach." ECO-Ag believes it is essential that the agricultural community is directly involved with all discussions regarding agricultural drainage given its direct impact on agricultural production.

A final concern that we would be remiss if not mentioned is that the proposed COA does not effectively address how compliance activities might be tailored to be both efficient and provide maximum environmental benefit. Due to the uniqueness of agricultural lands, a common sense approach to compliance and enforcement is required to ensure sampling results are meaningful and that best efforts are recognized. There are many factors which are beyond the control of farmers, such as weather patterns, soil types, overland and ground water flows, and nutrient contributions from the natural environment. There needs to be a recognition that we are all working towards the shared objective of protecting our waters.

ECO-Ag urges continued consultation with the agricultural community as more details or new initiatives arise from the Canada-Ontario Agreement. As a collaboration of sector organizations that represent the majority of farmers in the province, we urge the government to consider ECO-Ag as a trusted partner and advisor as these policy discussions continue.

Sincerely,

Keith Currie,
ECO-Ag Co-Chair

Jennifer MacTavish,
ECO-Ag Co-Chair

On behalf of ECO-Ag Collaborators:

Grain Farmers of Ontario
Ontario Federation of Agriculture
Ontario Fruit and Vegetable Growers' Association
Ontario Greenhouse Vegetable Growers
Ontario Pork
Ontario Processing Vegetable Growers
Ontario Sheep Farmers