



July 20th, 2021

Naomi Horst
Food Safety and Environmental Policy Branch
1 Stone Road West
Ontario Government Building, 2nd floor, Southwest
Guelph, ON N1G 4Y2

Dear Naomi,

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

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-3849 Nutrient Management Act Further Burden Reduction Opportunities*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO was an active participant in the Nutrient Management Efficiency and Continuous Improvement Discussion Forum and we were pleased to see the elimination of the five-year renewal requirement for Nutrient Management Strategies (NMS). The removal of the five-year renewal requirement for NMS will save farmers time and money, and will do away with the administrative burden for farmers where no significant change has occurred in their NMS.

We are also pleased to see OMAFRA and MECP take additional steps to reduce administrative burden, while ensuring environmental protections are maintained, and save farmers time and money as it relates to the *Nutrient Management Act* (NMA). The proposal to remove the automatic five-year cessation associated with the Agricultural Operation Planning (AOP) certificate for farmers who prepare their own NMS or Nutrient Management Plan (NMP), and the proposal to streamline and simplify the Nutrient Management Protocol to ensure the rules are clear and the associated resources are up to date are welcomed actions.

We have included our comments on the provided discussion questions below.

Do you agree with the changes described in this proposal? Why or why not?

BFO agrees with the changes in the proposal. Efforts to reduce red tape and administrative burden for farmers without compromising environmental protections is important. The removal of the five-year cessation associated with the AOP certificates simply makes sense following the removal of the five-year cessation of NMS's where no significant change has occurred.

Efforts to update and make the Protocol easier to understand by removing outdated forms, fixing broken web links and clarifying requirements are also welcomed. However, with no draft Protocol outlining the proposed changes included in this consultation, it is difficult to provide specific comments



on the intended changes. It was communicated by OMAFRA staff that the Protocol has acted as a guidance document, which is beyond the intended purpose of a protocol and a component of the changes will be rearranging aspects and removing other aspects that do not belong in the Protocol. BFO has previously requested the Government develop practical guidance materials and/or templates that more clearly outline the information that is required of producers for record-keeping and annual updates. Such work seems applicable to the efforts being made to streamline and simplify the Protocol.

BFO has advocated for additional red tape reduction measures beyond what is included in this consultation. Of these measures, we continue to request the Government consider the removal of the NMP five-year cessation for farms that do not have a substantial change in their plan. Past correspondence on this subject from OMAFRA has indicated there were no immediate plans to change the five-year cessation trigger for NMP. With the Government's commitment to cutting red tape and following in the steps of the NMS change, the removal of the NMP five-year cessation for farms where no substantial change to the operation has been made would be an effective measure towards achieving the Government's goal. Changing this practice could further reduce costs for both farmers and the government, while maintaining the intended purpose of the plans to keep our environment healthy and safe.

A complete list of BFO's other recommendations is included at the end of this submission.

Do you have any specific concerns with any of the items discussed in the proposal?

As noted above, BFO is supportive of the proposed changes and we have no specific concerns with any of the proposed changes.

Would the proposed changes reduce burden or contribute to additional opportunities for your business?

As most farmers hire a consultant to assist with developing their NMS, NMP and/or NASM, removing the five-year cessation of AOP certificates for farmers who complete their own strategy or plan will only apply to a relatively small number of producers. Nonetheless, the change will reduce burden and save money and time for the farmers who do complete their own strategy or plan.

As mentioned, there are other changes that we believe should be considered to reduce burden on farmers. These changes include:

- Remove the requirement under the *Nutrient Management Act* to update a nutrient management plan every five years if no substantial change to the operation has been made.
- Harmonize nutrient management record-keeping standards with the fertilizer dealer 4-R Nutrient Stewardship Dealer Certification Record Keeping Standards.
- Develop practical guidance materials and/or templates that clearly outline the information that is required of producers for record-keeping and annual updates, and that are closely aligned with the information a farm would assemble for business planning/management purposes.
- Streamline nutrient management certification, with the goal of making certification for signing off on nutrient management strategies more attainable for producers. This would increase the



number of producers who are directly familiar with the *Nutrient Management Act* requirements and their relevance for everyday scenarios on their own farms, rather than relying on paid third-party providers.

On behalf of BFO, thank you for the opportunity to provide feedback on the *ERO 019-3849 Nutrient Management Act Further Burden Reduction Opportunities*. We appreciate the continued efforts to reduce red tape within the NMA and we look forward to further discussions related to additional measures that can be taken.

Sincerely,

A handwritten signature in dark ink, reading "Rob Lipsett". The signature is written in a cursive, flowing style.

Rob Lipsett
President

