



August 31, 2015

Sandra George  
Great Lakes Basin and Lakewide Management Programs Coordinator  
Environment Canada  
867 Lakeshore Rd.  
Burlington, Ontario L7S 1A1

Dear Ms. George,

*Re: Recommended phosphorous loading targets for Lake Erie*

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide feedback on the recommended binational phosphorus loading targets for Lake Erie. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

Ontario's beef farmers are committed to the environment, and many of them work in the Lake Erie watersheds, sharing concern with others about the Lake's health and well-being. BFO supports efforts to protect and improve the water quality of all the Great Lakes, and the beef industry is committed to working with all levels of government towards the identification and implementation of practical and economically sensible solutions that reduce agricultural contribution to excessive phosphorous levels in Lake Erie. Ontario's beef industry appreciates being involved in the discussions and has a keen interest in participating in the development of proposed practices, programs and policies that could achieve the reduction targets without disrupting the competitiveness of affected beef farms.

There are several environmental initiatives and best management practices in place within Ontario's beef industry, and beef farmers have demonstrated their commitment to the environment through the development and implementation of Environmental Farm Plans and Nutrient Management Plans. Farmers who have already adopted measures for reducing phosphorous loading should be given credit for their good management, and it is important to ensure that early adopters are not punished. Considering that many farms are already implementing phosphorous-related best management practices (e.g. nutrient management, soil conservation), we have some reservations about whether a 40% reduction target is technically feasible or achievable in Ontario, and whether it is reasonable for

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farms to reduce their phosphorous loading by 40% if the benchmark is based on recognized best management practices, as opposed to a starting point of poor agronomy and manure management. We will continue to work with various levels of government to help address water quality and environmental challenges, and we look forward to building on current best management practices.

BFO acknowledges that the Western Basin of Lake Erie is particularly susceptible to phosphorous loading because it is shallow, mixes limitedly with the rest of the lake, and has several major rivers flowing into it that drain agricultural lands and treated sewage from millions of urban inhabitants. Additionally, the Western Basin has come under particular scrutiny as harmful algal blooms have occurred in several recent summers, which have affected all users of the lake (rural, urban and recreational) by virtue of it being unsafe to swim in the lake or drink water drawn from it for periods of time. Early-stage priority and focus should therefore be put on the Western Basin, where there will be the most immediate benefit to prioritizing implementation activities.

In addition, BFO sees a need for more clarity on the baseline and metrics to be used for measuring success in aiming for these recommended targets, and we suggest the development of standardized soil phosphorous tests for both total phosphorous and dissolved reactive phosphorous, with these standardized tests made obligatory for soil test labs.

BFO would like to thank Environment Canada for the opportunity to comment on the recommended binational phosphorus loading targets for Lake Erie. We would be pleased to meet with you to discuss the contents of this letter and we look forward to participating in further consultations on this important issue.

Sincerely,



Bob Gordanier  
President

cc: BFO Board of Directors  
Susan Humphrey, Environment Canada Associate Regional Director General - Ontario Region  
Nigel Wood, OMAFRA Manager - Program Coordination, Research and Partnerships  
Chris Attema, BFO Source Water Quality Specialist  
David Armitage, Ontario Federation of Agriculture Manager of Farm Policy

