



November 24, 2016

Paul Smith
Senior Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division - Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph, Ontario N1G 4Y2

Dear Mr. Smith,

Re: EBR Registry Number 012-8468: Discussion Document for Developing an Agricultural Soil Health and Conservation Strategy for Ontario

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments as part of the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) consultation on the development of an Agricultural Soil Health and Conservation Strategy. BFO represents the 19,000 beef producers across Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

Healthy soils are closely aligned with a healthy beef sector. Forage production, pasture-based cropping systems and grasslands managed by Ontario beef farmers do more than produce beef – they play an integral role in the health of Ontario’s agricultural soils, and also support ecosystem services such as wildlife habitat, biodiversity conservation, carbon storage, nutrient run-off management and the preservation of wetlands that may otherwise be subject to cultivation or development activities. The presence of cows on agricultural land improves soil fertility and structure through manure deposits, provides erosion control from fencerows and windbreaks, and promotes soil ecosystem health through the production of perennial forage crops that minimize tilling and soil disruption.

According to the Canadian Roundtable for Sustainable Beef’s *National Beef Sustainability Assessment and Strategy* report, approximately 1.5 billion tonnes of carbon are currently stored in the lands used by beef producers in Canada – 964 million tonnes in natural land for pasture and 589 million tonnes in crop land, tame pasture, hay and other land. As Ontario works to meet its greenhouse gas emissions reduction targets, forage production and pastureland play a significant role in carbon offsetting. However, measuring success in soil health improvement by only assessing the soil’s ability to absorb carbon will undoubtedly ignore other important metrics that should be taken into consideration. Ontario’s soil health strategy must clearly define the concept of soil health, as well as how soil health improvement and degradation are to be assessed and measured going forward.

The discussion document on the soil health strategy, *Sustaining Ontario’s Agricultural Soils: Towards a Shared Vision*, outlines some best management practices that are shared priorities in promoting both soil health and a sustainable, economically viable beef industry. When considering best management



practices for soil health, it should be noted that government policy and market factors have a significant influence on production practices in Ontario, which in turn can negatively affect soil health, and there are wide-ranging benefits that stem from increasing cow-carrying capacity of existing farmland and expanding Ontario's cow herd. Diverse crop rotations that include perennial crops for forage production, cover crops that protect the soil and provide feed for livestock, and fencing that acts as both an erosion control measure and critical infrastructure for beef production speak to the need for better integration of livestock into crop production. Further to this, OMAFRA's "Sustainable Crops, Sustainable Livestock" project supports the need to increase promotion of the wide-ranging benefits of integrating livestock into crop production.

Based on the important role that pastureland plays in soil health, there is an opportunity to include grazing practices that benefit soil health in the proposed theme areas 1 and 4 of the strategy, "Soil Management" and "Soil Knowledge and Innovation". This could include best management practices for intensive grazing, extended/winter grazing, cover crop grazing and crop residue grazing.

Ontario's soil mapping is long overdue for updating, and BFO recommends that soil maps be updated across all regions of the province. Soil mapping plays a critical role in land designation and land use policy, with Ontario's prime agricultural land typically comprising of CLI Class 1-3 soil. However, Class 4, 5 and 6 soils are of high value to livestock production, and BFO supports any efforts to recognize the importance of these lands, which aren't typically designated as prime agricultural. Indeed, it is BFO's position that the Provincial Policy Statement definition of prime agricultural areas should be expanded to include Class 1-4 land, as well as Class 5 and 6 land where part of an existing agricultural operation. The preservation of agricultural land, including land that is suitable for pasture but not in Class 1-3, is imperative to the sustainability of Ontario's beef industry, as well as the health and conservation of Ontario's agricultural soils.

Educating and encouraging farmers on best practices for soil health is a positive step, and should include promotion of soil testing. Soil testing is not only a good environmental practice, but also a smart business decision. There are economic and environmental benefits to soil testing that should be communicated to farmers in order to increase the amount of testing being done in Ontario.

The Beef Farmers of Ontario supports the development of an Agricultural Soil Health and Conservation Strategy for the province, and would like to thank the Ministry of Agriculture, Food and Rural Affairs for the opportunity to provide comments on the discussion document, *Sustaining Ontario's Agricultural Soils: Towards a Shared Vision*. We would be pleased to answer any questions on the comments contained in this document, and we look forward to participating in further consultations on this important issue.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors

