



December 30, 2017

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 013-1373: New Horizons: Draft Agricultural Soil Health and Conservation Strategy for Ontario*

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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 draft Agricultural Soil Health and Conservation Strategy for Ontario. BFO represents the 19,000 beef farmers across Ontario by advocating in the areas of policy planning, industry development and research, animal health and welfare, and domestic and export market development.

### **The Beef Industry's Role in Soil Health**

BFO strongly supports the development of a soil health strategy for Ontario. Healthy soils are closely aligned with a healthy beef sector. Forage production, pasture-based cropping systems, and grasslands managed by Ontario beef farmers play an integral role in the health of Ontario's agricultural soils. The presence of cows and other grazing livestock 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.

Forage and beef production systems, by nature and by default, support the key principles of soil health. Even when compared to no-till cropping systems that include cover crops and crop rotation, land with livestock on it will typically provide better soil health outcomes due to improved soil ecosystems, fertility and structure. Broad initiatives that support Ontario's ruminant livestock sectors, such as improved production and price support programs, along with other incentives to grow the domestic markets for hay, cereals and perennial biomass crops, will help Ontario achieve many of the desired outcomes contained in the soil health strategy.

Specifically, BFO believes that Ontario's soil health strategy should more explicitly recognize and promote the benefits of integrating livestock into crop production on existing farmland and encourage



expansion of Ontario's pasture and forage acreage. The following recommendations have been developed to help accomplish this:

- Include a representative of forage-based livestock on the soil health strategy working group. Forage-based livestock represents the production system that soil health best management practices and guiding principles are based on. The expertise of this sector is needed on the working group. Representation of forage-based livestock will provide valuable insight in the development of actions that promote and incentivize livestock integration into cropping systems, cover crop grazing and other potential actions to improve soil health.
- Recognize the good work of ruminant livestock farmers. Farm-scale soil organic matter targets proposed in the strategy are fairly moderate by the standards of ruminant livestock and forage-based production. BFO recommends including separate, higher targets for pastureland while highlighting the potential that cropland has for meeting these higher organic matter targets if perennial crops and livestock are integrated into the production systems. Further to this, the soil health strategy should also promote a practice-based target for producers to include perennial crops in crop rotations, alongside the practice-based targets for crop rotations and cover crops.
- Include an action item in the strategy for encouraging and assisting farmers to take high-risk soils out of crop systems and put them into forages and pasture. There is significant research and evidence that illustrates the regenerative benefits of livestock grazing on soil that is depleted of nutrients or organic matter. At the same time, there is land in Ontario that is not suitable for crop production but would provide excellent land for pastures and forages. Not all land can or should be used for growing traditional cash crops, and the soil health strategy should encourage farmers to put land and soil to its best use. In addition, the strategy should provide guidance on how transitioning land from crops to pasture and forages can be immensely beneficial to the long-term health and productivity of high-risk soils.
- To encourage widespread adoption of cover crops, promote the specific opportunities for diversifying cropping operations by grazing livestock on cover crops, and renting cover crop acreage to livestock farmers for grazing. Beef farmers are keenly interested in the potential for cover crop and crop residue grazing, and BFO is willing to collaborate on promoting these opportunities. To help promote livestock integration on cropland through cover crop and crop residue grazing, the soil health strategy should emphasize the importance of perimeter fencing as critical infrastructure for achieving soil health goals in Ontario, as it will allow grazing to return to what is now cropland. Part of this emphasis should be recognition of the absence of (and need for) funding incentives to establish perimeter fencing.
- Based on the important role that pastureland plays in soil health, there is an opportunity to include the key principles of grazing best management practices that benefit soil health in Theme 1: Soil Management and Theme 4: Soil Knowledge and Innovation. This could include best management practices for intensive grazing, extended/winter grazing, cover crop grazing and crop residue grazing.
- Expand soil health programming and outreach to livestock farmers. BFO recommends including more outreach to ruminant livestock farmers to raise awareness of the soil health benefits of their production systems and to help troubleshoot any potential soil issues facing that sector, such as soil compaction. This should include an expansion of the Soil Health Check-Up program to all regions of the province, including Northern Ontario, with the program also made more accessible to livestock



farmers. Beef farmers are stewards of some of the healthiest soils in the province, and they are eager to be involved in programs that can help them better understand this valuable resource. In general, programs and funding related to soil health should be more accessible to ruminant livestock farmers.

- Provide a more comprehensive definition of a proper soil test. Soil health tests should test for more than chemical composition – they should also include soil respiration, biological activities and organic matter. Educating and encouraging farmers on best practices for soil health is a positive step, and BFO believes that this should include promotion of comprehensive 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.
- BFO supports the proposed action of “explor[ing] opportunities for web-based tools for locating and accessing organic amendment materials”, and we encourage collaboration with industry and those who work on nutrient management policies and education to promote the use of organic amendments and develop tools for sharing these materials between farms.

### **Importance of Outcome-based and Holistic Government Policies**

When considering best management practices for soil health, it should be noted and explicitly recognized that government policies have a significant influence on production practices in Ontario, which in turn can negatively affect soil health. As an example, one needs only to look at the level of business risk management (BRM) support available to grains and oilseed production versus forage and non-supply managed livestock production. While margin-based programming has declined (removal of Tier 1 in 2008 and Tier 2 in 2013), crop insurance has remained unchanged (up to 90% yield and quality coverage). At the same time, supply managed sectors continue to enjoy a market structure that provides 100% cost of production entitlement. Not only is total farm support declining for non-supply managed livestock farmers, the share of programs directly supporting livestock is also declining. As a result, government support programs are encouraging production in sectors that present greater long-term risks to Ontario’s soils. Ultimately, the disparity in government support programming, notably as a result of inequity in the current BRM suite of programs, provides a disincentive for farmers to utilize forages and pasture-based livestock systems on their lands.

Further to this, the goals of the soil health strategy must be considered alongside the goals of other government policies and initiatives, such as the *Nutrient Management Act* and Lake Erie Domestic Action Plan. To harmonize the various government policies and initiatives that intersect with soil health, they must be holistic and outcome based. For example, addressing soil health priorities, including compaction and organic matter, while reducing nutrient run-off from manure application cannot be achieved through prescriptive policies, such as restricting manure application according to season or calendar date. Policies on manure application must be based on soil condition, not calendar dates, to achieve the best outcomes for soil health and nutrient run-off.

### **Define the Soil Health Risks**

BFO recommends that the strategy provide a clearer picture to farmers and policymakers of the economic, environmental and social risks of continued degradation of agricultural soils. The strategy does not provide a sufficient assessment of the current state of Ontario’s agricultural soils or a clear call



to action to address existing soil health issues. In addition, the strategy provides no target for halting soil erosion or increasing soil organic matter. These targets should be included with specific timeframes, so actions and resources can be prioritized accordingly. The agricultural sector should be challenged to loftier goals.

### **Conclusion**

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 draft document. We would be pleased to answer any questions on our provided comments, and we look forward to participating in further discussions on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Matt Bowman". The signature is fluid and cursive, with the first name "Matt" and last name "Bowman" clearly distinguishable.

Matt Bowman  
President

cc: BFO Board of Directors

