



Minister's Agricultural Roundtable
Cutting Red Tape and Reducing Regulatory Burden
January 10, 2019 - Guelph, ON

Beef Farmers of Ontario (BFO) appreciates the opportunity to present our priorities for cutting red tape and reducing regulatory burden for farmers, as part of Minister Hardeman's agricultural roundtable series.

While the province's commitment to reduce red tape and regulatory burden is welcomed by the Ontario beef industry, there is no single action more important to our members than fulfilling the commitment to increase the cap on the Ontario Risk Management Program (RMP). RMP fills a critical gap for livestock commodities in Ontario that are not protected by the supply management system or have access to other effective farm support programs like crop insurance. The government's recognition of the current funding shortfall, and of the benefits the program provides, reinforces the need to follow through on the commitment to increase the annual allocation into the program as soon as possible.

*"The single greatest action the Ontario government can do to support Ontario's 19,000 beef farmers is to immediately fulfill the election commitment to increase the annual allocation of the **Ontario Risk Management Program (RMP)** by \$50 million and allow all unused portions to be rolled over into the next program year" – Joe Hill, BFO President*

The priority issues contained in the remainder of this document have been submitted for consideration under the province's red tape and regulatory burden reduction commitment, on behalf of BFO and our 19,000 members.

Issue #1: Reduce administrative burdens in the *Nutrient Management Act*

BFO is very encouraged by the recent announcement to remove the automatic five-year update requirement for nutrient management strategies where no significant operational change has occurred. The development and submission of each new nutrient management strategy (every five years) requires a considerable amount of time, financial cost and documentation, and the current five-year renewal administrative requirement provides no increased environmental benefit.

There are additional measures to be considered that would reduce red tape by streamlining and improving the nutrient management record-keeping and annual update requirements. It would be helpful if government and industry could work together to develop appropriate and simplified guidelines and record-keeping templates for livestock producers with nutrient management strategies and nutrient management plans. Further to this, there is a good opportunity to harmonize and integrate with the fertilizer dealer 4-R Nutrient Stewardship dealer certification record-keeping standards.

Recommendations:

- Remove the requirement under the *Nutrient Management Act* to update a nutrient management



strategy 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 more clearly outline the information that is required of producers for record-keeping and annual updates, and that are more 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.

Issue #2: Create a transparent, defined, predictable and responsive Crown Land disposition process to promote agricultural growth in Northern Ontario

The current MNRF permitting process typically does not allow divestment of more than 160-acre Crown land lots at a time per application. Livestock production is also not currently recognized as a permitted land use. The current process is not workable or attractive to the vast majority of livestock producers, or for other agricultural sectors for that matter, because of the limitations on how much land can be accessed at one time, what land use activities are permitted on that land, and the overly burdensome and lengthy permitting process that can take up to two years to complete. No farmer or potential farmer will attempt to jump through the current administrative hurdles needed to access 160 acres or less at a time.

Land is the single largest cost in farm establishment and every decade we are losing over 1 million acres to urban sprawl in Ontario: that's roughly 350 acres per day. There are almost 200 million acres of land in northern Ontario, and 16 million acres of greater Clay Belt land in the north, most of which is Crown-owned. We need to find ways to unlock some of this land for agricultural expansion, economic growth in the region, and Ontario's food security. Having sustainable livestock operations on just a fraction of these acres will reduce the threat of processing plants closing, and the increased production can be used to access new and growing markets in Ontario and around the globe. However, we need a better land permit process to do this. BFO has already developed resources and tools for cow herd expansion in Northern Ontario. Unlocking access to Crown land for livestock production is a critical piece to growing the beef industry in the north.

Recommendations:

- Create a dedicated application stream for obtaining land use permits on Crown land for livestock production.
- Recognize beef and livestock production as a permitted alternate land use on Crown land.
- Allow divestment of lands in excess of 160-acre lots to align with minimum requirements for establishing economically viable farms.

Issue #3: Allow Livestock Medicines Outlets (LMOs) to sell prescription livestock medicines

Changes that took effect on December 1, 2018 to restrict dispensing of prescription livestock medicines to veterinarians and pharmacists alone have reduced accessibility of important products needed to maintain animal health, welfare and productivity. While BFO supports the move to require veterinary prescriptions for some classes of livestock medicines, we cannot see how restricting LMOs from dispensing these products supports the goal of reducing the risk of antimicrobial resistance in human or animal health. There are over



500 LMOs currently registered to dispense livestock medicines in Ontario, and they are more than capable of filling prescriptions prescribed by veterinarians.

Recommendation:

- Allow registered LMOs to dispense prescription livestock medicines with a valid prescription.

Issue #4: Reduce administrative burdens and simplify the Canadian Agricultural Partnership (CAP) application process

Very few producers are attempting to access the current CAP program, and even fewer are successful. Rather than being a catalyst for on-farm improvements, CAP is increasingly being viewed as a source of red tape, consuming extraordinary amounts of producer time, and increasingly their money, as the program's complexity has spawned a new industry of consultants who navigate the paperwork.

Below is an overview of the amount of paperwork required to navigate the current iteration of the program:

- 69 pages of program guides
 - Protection & Assurance: 14 pages
 - Environmental Stewardship 14 pages
 - Economic Development 13 pages
 - LEADS (soil & nutrient management) 28 pages
- ~120 pages of project category descriptions
 - 64 project categories listed on between 1 to 3 pages of instructions per category
- 25 pages for typical applicant producer
 - 10 pages per project x 2 projects per application
 - 5 pages of biosecurity self-assessment
- 53 pages of biosecurity course material
- 140 pages of Growing Your Farm Profits (GYFP) course material
- 308 pages of Environmental Farm Plan (EFP) course material

Recommendations:

- Permit funding for manure storage projects.
- Allow business expansion activities to be included as part of eligible activities or dedicated projects.
- Create a technical industry-government working group to develop solutions to reduce the administrative burden for producers that apply for CAP funding, while ensuring the evaluation process supports the types of projects deemed valuable by producers, industry and government.

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The Beef Farmers of Ontario represent 19,000 beef producers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development. BFO's vision is help foster a sustainable and profitable beef industry, and have Ontario beef recognized as an outstanding product by our consumers.

