



FERTILIZER CANADA

FERTILISANTS CANADA

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June 27th, 2021

Liz Mikel
Conservation and Source Protection Branch
40 St Clair Ave W 14th Flr
Toronto, ON
M4V 1M2

Submitted to: ca.office@ontario.ca

Re: ERO 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act

Dear Ms. Mikel,

Fertilizer Canada thanks Ontario Ministry of Environment, Conservation and Parks for the opportunity to respond to the *ERO 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act*.

Fertilizer Canada represents manufacturers, wholesale and retail distributors of nitrogen, phosphate, potash and sulphur fertilizers – the backbone of Canada’s agri-food economy. Responsible for half of the world’s current food production, fertilizer is fundamental to the future of agriculture and farmers’ ability to feed a growing global population.

Fertilizers play an essential role in replenishing nutrients in the soil that are used by plants each growing season, raising soil productivity, and improving soil health; but incorrect nutrient use may lead to negative impacts on a grower’s return on investment and risk increased impacts on the environment. In order to have this downstream assurance of sustainable farming, the 4R Nutrient Stewardship Framework has been designed.

4R Nutrient Stewardship is a science-based approach to fertilizer management that involves applying the Right Source @ Right Rate, Right Time, Right Place®. Use of the 4Rs optimizes plant nutrient uptake, maximizes yield and increases profitability, while also minimizing nutrient runoff, leaching and nitrous oxide emissions.

In the province of Ontario, Fertilizer Canada works through a Memorandum of Cooperation (MOC) to support 4R Nutrient Stewardship programming to growers. One of the key members of that group is Conservation Ontario and the Conservation Authorities (CA’s). These CA’s are large supporters of 4R programming and represent a key resource for Ontario growers looking to implement sustainable agriculture practices and protect their water ways.



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Within the proposed regulatory changes to the *Conservations Authorities Act*, Fertilizer Canada supports a transition to define mandatory and non-mandatory CA programs and services provided on behalf of a municipality. However, to ensure these programs reach their potential benefits, the programs will need to be sufficiently supported financially and will required flexibility to allow changes to be implemented at a CA level.

Any regulatory or program change under the *Conservation Authorities Act* also needs to consider the importance of agriculture on the Ontario landscape. Across Ontario, there are 12.3 million acres under agricultural production. These acres represent approximately 5% of Ontario land they are important to protect and preserve as a key natural resource. In OMAFRA's 2017 *Agriculture Economic Development*¹ report agriculture in Ontario was said to contributed approximately \$37 billion in gross domestic product (GDP) to the provincial economy and jobs for over 800,000 people (roughly 11.5 per cent of provincial employment).

Fertilizer Canada has the following recommendations for the proposed mandatory services provided by Ontario CA's:

- Currently, it is being proposed that there will be a mandatory Community Advisory Board established under each CA stating that the government will prescribe *Ensuring, where possible, members represent the geographic range of the authority's jurisdiction*. Fertilizer Canada encourages the Government of Ontario to recognize the importance of the agriculture community by allocating specific grower representation on these Community Advisory Boards. Further, the province should adequately engage Ontario grower organizations in these discussions to ensure grower representation.
- Fertilizer Canada asks that the Government of Ontario recognize the importance of the land stewardship programs in agricultural, rural, and urban settings. Land stewardship programs, such as the 4R Nutrient Stewardship program, are essential when working with agriculture communities. The 4R Nutrient Stewardship framework, or specifically the 4R Certification program in Ontario, works with growers to increase nutrient uptake and mitigate nutrient loss so that we can produce abundant crops and collectively protect our water ways. As one of the key mandates of the CA's is to protect water quantity and water quality, Fertilizer Canada asks that 4R Certification program resources be made available to CA's across Ontario.

¹ <http://www.omafra.gov.on.ca/english/landuse/aed.pdf>



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Fertilizer Canada thanks the Ontario Ministry of Environment, Conservation and Parks for the opportunity to respond to *ERO 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act*. We welcome any questions and would be pleased to schedule a meeting to discuss our consultation response further.

Sincerely,

McKenzie Smith
Director, Stewardship & Regulatory Affairs
Fertilizer Canada

