



Ontario Veal Association's Submission to the Environmental Bill of Rights with Respect to Ontario's Nutrient Management Act

EBR Registry Number: RC02E0002

The Ontario Veal Association (OVA) supports, in principle, Ontario's Nutrient Management Act and its intention to create a system of province wide standards regarding the application of nutrients to the land. In addition, the OVA supports the Ontario Farm Environmental Coalition (OFEC) position statement which is based on the following three important principles:

1. **Need:** Standards and regulations for nutrient management must be supported by proven research. Regulations must be based on current proven science.
2. **Practical:** Regulations and standards must focus on risk management principles that permit Ontario agriculture to remain globally competitive.
3. **Affordable:** Prior to implementation, all proposed regulations and standards must undergo environmental and economic impact assessment. Associated regulations for the agri-food sector must be agronomically, environmentally and economically sustainable.

More specifically, the OVA believes that government should:

- Provide all producers with a significant compensation program in order to ensure the economic viability of Ontario producers. There is little or no opportunity for producers to recoup the costs associated with Bill 81 from the marketplace. Funding must be guaranteed for a minimum of five years to ensure availability as different categories of farms are phased into compliance.
- Develop an educational program for producers as the various regulations come into effect. OMAF should provide free telephone access with expert staff who have an expertise with the regulations and practical farm application of the regulations. Additionally, OMAF should provide services for producers that would see the free collection of data required for the completion of the in-depth nutrient management plans and land assessments required by the new regulations. Lastly, OMAF must provide farmers with easily understood written materials in order to better understand the individual impact of the regulations.
- Apply a more practical approach to the development of the regulations so that farmers will be better able to implement required changes in their operations. For example, the current draft regulations for the storage of manure or for winter spreading suggest a very rigid approach. Whereas the OVA believes that the regulations should focus more on the characteristics of the individual farms, soil characteristics, manure composition and one that allows farmers to develop good management practices through their documented nutrient management plans.

Veal producers today face so many challenges and pressures in order to remain viable. Strong financial support programs for producers in Quebec and the US have only placed more pressure on producers. The OVA believes it is important to Ontario's economy and social structure to have a strong and vibrant agricultural industry. Nutrient management regulations must be needed, be based on risk management and be affordable.

Ontario Veal Association

130 Malcolm Road, Guelph, Ontario, N1K 1B1

Tel: 519-824-2942 Fax 519-824-9101 www.ontarioveal.on.ca