

February 5, 2021

Ms. Sara Peckford Food Safety and Environmental Policy Branch Ministry of Agriculture, Food and Rural Affairs Ontario Government Bldg 2nd Flr SW, 1 Stone Rd. West Guelph, N1G 4Y2

Sent by email: sara.peckford@ontario.ca

Dear Ms. Peckford,

Re: Environmental Registry of Ontario posting 019-2814 Drainage Act Regulatory Proposal

Ontario Pork is the voice of the province's 1,143 pork farmers, and a leader in the agriculture industry. Led by producers, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork sector represents a significant part of the Canadian economy, combining - from "farm to fork" - \$1 billion in GDP, over 15,300 full time jobs and over \$2.7 million in economic output.

Ontario Pork welcomes the opportunity to provide input on the Drainage Act Regulatory Proposal. Initiatives that streamline Drainage Act processes and improve drain performance are welcomed by Ontario's pork farmers. Pork production is closely tied to efficient grain production and appropriate timing of manure application which requires properly drained land. Having an ample supply of good quality grain and the opportunity to apply and incorporate manure while minimizing soil compaction is a key factor to efficient pork production in our province.

Ontario Pork is in favour of the adoption of technical protocols by reference in regulation, ensuring that compliance with the DART protocols is no longer voluntary. We also believe that there is a need to update the DART protocol to reflect recent changes to the Conservation Authorities Act, related to Section 28 and the upcoming definitions of terms such as "development activity", "watercourse" and "wetland". Defining these terms will have a bearing on the current DART protocol, as well as on potential future protocols. The provincial government needs to initiate the development of these terms as soon as possible.

Ontario Pork also continues to support simplified processes for minor improvements so projects can be completed in a less costly and more efficient way, including updating the engineer's report to account for changes made to drain design during construction.

Ontario Pork appreciates the opportunity to provide input on the Drainage Act Regulatory Proposal.

Sincerely,

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Eric Schwindt Board Chair