



September 16, 2021

Naomi Horst, Policy Advisor
Food Safety and Environmental Policy Branch
1 Stone Road West, Ontario Ministry of Agriculture, Food and Rural Affairs
Guelph, ON N1G 4Y2
Sent via email to: naomi.horst@ontario.ca

Dear Ms. Horst,

Re: Nutrient Management Protocol for Ontario Regulation 267/03 made under the Nutrient Management Act, 2002

On behalf of Ontario Pork, thank you for the opportunity to provide comments to the Nutrient Management Protocol for Ontario Regulation 267/03 made under the Nutrient Management Act, 2002, further to our submission on July 26, 2021, regarding ERO 019-3849: Nutrient Management Act Further Burden Reduction Opportunities consultation.

It is our understanding that any the proposed changes to the protocol are housekeeping amendments and will not impact the requirements of the protocol or regulation. Based on our review of the proposed changes to the protocol, we are in general agreement that the proposed changes will not impact the requirements of the regulation of protocol. The exception is found in Part 7 Section 7.4 Field Sketch Requirements.

This appears to be a new requirement for Nutrient Management Plan Field Sketches. It is unclear how this relates to the Nutrient Management Regulation. As well, this requirement lacks clarity regarding the distance to the individual field and if this requirement is applied to neighboring tile inlets that are outside the farm unit boundary. A possible amendment would include clarification on the distance to the field boundary (e.g., 15 m) and /or amendment to confirm that this requirement applies to only the tile inlets within the farm unit boundary.

Further, it is our understanding that the edits are meant to improve clarity, understanding and streamline processes. In the amended Protocol, Table 4.2.1 has been removed. There may be some benefit in retaining Table 4.2.1 as it provides a clear and concise summary and comparison of the requirements of the Regulation.

Thank you again for the opportunity to provide input to this consultation. We would be pleased to provide further information as appropriate.

Sincerely,

John de Bruyn
Board Chair