

January 13, 2023 **Draft 1 -submission is due February 2**

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Food Safety and Environmental Policy
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Submission by e-mail: sarah.fleischhauer@ontario.ca

Dear Ms. Fleischhauer,

Subject: ERO number 019-6404: Proposed changes to Tables 1 and 2 of the Nutrient Management Protocol incorporated by reference into O. Reg 267/03 made under the Nutrient Management Act, 2002

Ontario Pork welcomes the opportunity to provide comments on ERO number 019-6404: Proposed changes to Tables 1 and 2 of the Nutrient Management Protocol incorporated by reference into O. Reg 267/03 made under the Nutrient Management Act, 2002.

Ontario Pork is the voice of the province's 1,064 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" - \$1.35 billion in GDP, over 19,906 full-time jobs and \$3.78 billion in economic output.

For the Nutrient Management Act Table 1, Ontario Pork supports the proposed updates to help ensure that the values remain up-to-date and reflect current industry values, as stated in the consultation. Historically, sows with litters and segregated early wean (SEW) sows were treated differently, but they both produced the same amount of manure. In the proposal, they are treated the same at 3.5 animals per nutrient unit. This is one of several factors used to calculate Minimum Distance Separation (MDS) and will allow SEW producers to expand/build needing slightly less distance from various uses. This proposed change will also ensure that nutrient unit values for sows producing an equal volume of manure are the same.

For the proposed changes to the Nutrient Management Act Table 2, specific to manure nutrient values, Ontario Pork support changes to the chart which more accurately reflect manure sample results, as well differentiating between available nutrients from Nitrogen applied in the fall of the year and N applied in the spring. The accuracy of the proposed new chart will allow producers to better assess the value of Nitrogen applied in the fall versus the spring.

Ontario Pork appreciates the opportunity to provide input on this consultation and welcomes any questions you may have on our submission.