

The Organic Council of Ontario
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December 9th, 2016

Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West, 2nd floor
Guelph, ON N1G 4Y2

RE: ‘Sustaining Ontario’s Agricultural Soils: Towards a Shared Vision’

To Whom it may Concern:

The Organic Council of Ontario (OCO) applauds the work done to champion soil health through the Sustaining Ontario’s Agricultural Soils discussion paper. OCO believes that building healthy soil and protecting our ecosystems is the backbone of a thriving agri-food sector. We hope to work with the Province to grow the number of farmers dedicated to this work.

To that end, please consider the following recommendations in your future policy development process:

Soil Management

OCO commends the use of a holistic view of soil health that includes soil biology. We encourage OMAFRA to **also** include soil management objectives that aim to decrease inputs that negatively impact soil biology and increase erosion, and consider a systemic approach to soil improvement, rather than a piecemeal approach, as argued by the Ecological Farmers Association of Ontario (EFAO) in their own response to this discussion paper. The strategy refers to “diverse” crop rotations, language which we strongly support. However, longer crop rotations that include perennials are key to improving soil health. Including some reference to duration is key. Other management practices that has demonstrated benefits for soil health are “intensive rotational grazing” of livestock, the elimination of bare soil over winter, and an overall reduction in the use of synthetic fertilizer. “Land covered by healthy pasture reduces the risk of soil erosion” and protects surrounding ecosystems¹.

Above all, we urge the government to ensure that farmers are supported and rewarded for actually maintaining and building soil health, not merely for implementing practices that theoretically do so. This will be made possible through the collection of soil health baseline data, and through future soil health monitoring. Plans for the incentivization of improved soil health results should be included in future policy.

Soil Information and Mapping

We applaud the government for working towards an accessible, digitally available, flexible baseline of soil types and soil health from which to make production and policy decisions. We believe that farmer engagement and input in this process is critical. In order to ensure accurate, unbiased data, it is vital that all production types and scales be represented. If digitization relies heavily on data from GPS and other high-tech, automated systems, government must also work to include farmers that do not use this technology. For this reason, we approve of efforts to make available an on-farm soil health testing kit. Training and resources to support and encourage its use should accompany this program.

Soil Monitoring and Modelling

That OMAFRA is adopting and employing the federal agri-environmental indicators is a step in the right direction. We hope to see soil biology measures incorporated into monitoring activities in the future.

Sustaining and improving human resource capacity in soil knowledge is critical to the future of the soil health of Ontario. It is not enough to just sustain these resources: we must also improve them and increase access to them. To this end, we recommend that soil specialists, agronomists and farmers specializing in soil health and organic production be subsidized for extension services they offer related to soil health best management practices.

Include Organic Farmers as Leading Innovators

Most organic farmers have already implemented the best practices outlined in *Sustaining Ontario's Agricultural Soils*. Management practices that encompass many of the Province's recommendations are written into the Canadian Organic Standards, enforced through annual inspections and encouraged by growing market demand. Organic farmers have been performing independent soil health research for decades, and have gained the "soil-related knowledge and skills" required to drive innovation. It is important that the Province recognize, showcase and engage organic farmers as the innovators that they are.

Our members have expressed a desire for increased support of farmer-led research that engages farmer innovators in identifying research problems that need addressing, advising the industry on key directions for research in soil health innovation and participating in on-farm studies of organic innovations. Their participation in research and innovation will be vital to the future of Ontario's agri-food sector.

Recognition for Ontario's Organic Sector

Too often, OMAFRA and other organizations avoid using the term "organic" because they don't want to appear to be supporting one "industry" over another. However, organic is a growing sector of the agricultural industry, stimulated by ever-increasing consumer demand. Organic is guided by a set of well-researched practices, many of which benefit soil health. As such, it should be recognized by OMAFRA as an important method of production and be given more

voice in important provincial agri-food discussions and programs.

Due to organic agriculture's proven benefits to soil health, OCO recommends that financial support be provided to producers pursuing organic certification. This support is a sound investment in soil health and regional economic stability. Statistical data and economic research from both the U.S. and Canada indicates that organic farms are more profitable than conventional farms, and help reduce poverty regionally.⁴ Quebec's recent increase in financial supports for farmers transitioning to organic is an example of this sort of policy at work in other provinces. Programs that support producers to access premium prices as a result of improved soil health will encourage them to continue using best management practices, regardless of government support.

We look forward to program and financial supports that will incentivize better soil management, including, but not limited to, direct payments and tax credits related to improved soil health outcomes. We also encourage the Ontario government to consider additional economic supports to help farmers transitioning to or expanding their organic production, as other jurisdictions have done.

This soil health strategy is an important and timely step for the Ontario agri-food sector. As always, OCO looks forward to working with the Province to develop policies and programs that include organic agriculture and help to build a thriving agri-food sector in Ontario.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Manley", with a horizontal line underneath.

Tom Manley
President
The Organic Council of Ontario

References:

1. Kyle, Jack and Victoria McPhail, 2012. Rotational Grazing in Extensive Pastures. Ontario Ministry of Agriculture, Food and Rural Affairs.
http://www.ontariosoilcrop.org/wp-content/uploads/2015/08/rotational_grazing_in_extensive_pastures.sm_.pdf
2. Lynch, D.H. 2014. Sustaining soil organic carbon, soil quality and soil health in organic field crop management systems. Pp 107-132 In Mar6n, R.C and MacRae, R. [Eds] Managing Energy, Nutrients and Pests in Organic Field Crops. CRC Press.
3. Lynch, D.H., MacRae, R., Martin, R.C, 2011. The Carbon and Global Warming Potential Impacts of Organic Farming: Does It Have a Significant Role in an Energy Constrained World? (p. 350). *Sustainability*. 3, 322-362; doi:10.3390/su3020322
4. Jaenicke, Edward C., 2016. U.S. Organic Hotspots and their Benefit to Local Economies. Organic Trade Association.
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