

Jack Gibbons, Chair,
Lake Simcoe Watch
160 John St., #300,
Toronto, ON M5V 2E5

Dear Mr. Gibbons,

The National Farmers Union – Ontario (NFU-O) is a provincially accredited general farm organization whose members work together to advocate for policies that maintain small and medium-sized family farms as the primary food producers in Canada. The NFU-O believes agriculture should be economically, socially and environmentally sustainable and lead to enriched soils, biodiverse ecosystems, financially viable farms, healthy and safe food and thriving rural communities. We appreciate this opportunity to comment on the Cleaning-Up Lake Simcoe report and would like to add these thoughts and concerns for your organization to consider:

Pg. 2 Agriculture

Starter Fertilizer Banding

Developed and promoted as a result of the algae problems plaguing the west basin of Lake Erie, Ontario's 4 R Nutrient Stewardship concept promotes the use of fertilizer in cropping systems that incorporates the 1) Right fertilizer source at the 2) Right rate at the 3) Right time, and in 4) the Right place. Starter fertilizer banding beside the seed in row crops such as corn below the soil surface during planting is less prone to leaching N,P,K into watercourses than starter fertilizer that is broadcast on the soil surface. Encouraging the use of fertilizer banding can be a useful first step in reducing N and P movement into watercourses and eventually into Lake Simcoe.

Livestock Manure Spreading Protocols

Livestock producer groups, NGO's, and the three general farm organizations have created the Timing Matters: Peer to Peer Reference Group to address concerns about livestock manure leaching into watersheds draining into Lake Erie. The group has worked diligently to remind producers that livestock manure spreading on snow-covered, frozen, or saturated soils had definite water quality consequences to nearby bodies of water. A campaign was launched for the Lake Erie basin and has received general acceptance by producer groups. Lake Simcoe could easily be added to the Reference Group's mandate, to reduce the threat of water quality impairments for the residents of the watershed.

Pg. 4 Urban Stormwater

The complete package of P control measures for urban stormwater as suggested in the Cleaning Up Lake Simcoe report is thorough and very well done by the authors. Historically, the pace at which municipal sewers are being separated from stormwater overflows (CSO's) continues to plod along in the province, with the risks to water quality becoming increasingly evident during the flash rainfall events that we can expect with climate change. Though the Province's Lake Simcoe Phosphorous Reduction Strategy

suggests that sewage treatment plant bypasses, outlets for mostly raw, untreated sewage during large rainstorm events, should be reduced or eliminated where possible, the only real strategy is complete elimination of STP bypasses, to preserve the gift that is Lake Simcoe.

Pg. 5 Additional Sources of P

Septics

Fourth, private septic systems do require maintenance, especially in this time of intense, localized rainfall events. Heavily promoting the routine pumping of private septic tanks, every four or five years will go a long way towards ensuring that septic systems and their networks continue to work safely for their owners and the community at large.

The Cleaning Up Lake Simcoe Report suggests that private septic tanks should be connected to municipal sewer systems on a compulsory basis where available. We would suggest that should be only on the condition that it is not a combined sewer system with bypasses.

With best wishes for every success,



Don Ciparis
NFU-O President