



TO  
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FROM  
DE

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|---------------------------------------|
| SECURITY-CLASSIFICATION - DE SÉCURITÉ |
| OUR FILE - N/RÉFÉRENCE                |
| YOUR FILE - V/RÉFÉRENCE               |
| DATE<br>September 9, 1976             |

SUBJECT  
OBJET

REPORT #2 AGRICULTURE PROVINCIAL AND LOCAL CONTROLS

I have reviewed Report #2 "Agriculture Provincial & Local Controls" and would like to make the following points -

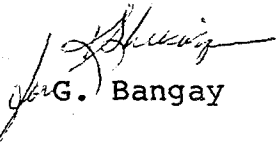
1. Since this report will eventually be combined with the other reports ie Urban a uniform table of contents would be adviseable.
2. Overview 2nd. last paragraph. The approach of government underwriting the costs of pollution control in the U.S. Agricultural community is coming under strong attack and in fact the Agricultural Stabilization and Conservation Service established by the Federal government to subsidize the efforts of the Soil and Water Cons. District for individual farm projects may be disbanded. Might be worth talking to Mary Garner concerning this issue.
3. Numbering your pages would have been more helpful in making comments.
4. EPA - Key Provisions - footnote #3 is missing.
5. I found your discussion under the OWRA informative but relatively inconclusive. Do you intend to recommend an approach at a later date or would it be advisable for PLUARG to await the results of field studies to determine if the hierarchial arrangement of pollutants established by the London office fertilizer use; erosion/sedimentation/drainage....pesticides proves correct before taking a position.

I must admit that I also remain skeptical concerning the value of a permit system if only because of the manner in which MOE administered its "Water Taking Permit Program" - The laughing stock of the rural Ontario. It did however set a precedent for MOE regulating the rural sector independently of OMAF. It might be interesting to see what the present status of this program is.

6. This section has also reminded me of the need for you to begin recirculating the relevant sections of these reports after this initial review to the respective individuals who have contributed information. We can discuss details of this when we get together.
7. Last paragraph - OWRA - relates also to footnote 47 - perhaps a farmer could be required to present his soil test report when he purchases fertilizer and thus would clearly indicate the maximum allowable amount to be purchased. A farmer could still apply a heavier dose to one part of his farm but this is unlikely since the remainder would go untreated. The vendor could then be required to submit the copy of soil test report along with an indication of the amount sold to a central office for regulation. This regulatory approach might best be enforced at the Federal level under the Fertilizer Act. Please consider.
8. Footnote 70 - was there any explanation forthcoming why chlordane was still in Schedules 2-5 and not at least in Schedule 1 or banned.
9. Environmental Assessment Act - Is there not further information on the state of negotiations between OMAF and MOE re regulations under this Act. See L. Parsons, MOE
10. Footnote #105 Since the time of writing have you been able to determine if any other authorities are supporting programs of this nature.
11. Conservation Authorities Act - It is unclear to me why the Cons. Authorities Br. feel that "considerable external pressure from the general public would have to be made" to achieve the reinstatement of programs related to soil conservation in agriculture. It has always been my perception that the Cons. Authorities were to take a lead responsibility in educating the public about the importance of such problems as soil erosion rather than wait for the public to discover that it was a problem.
12. Footnote #113 - are you not referring to exemptions under the Environmental Protection Act. Are you suggesting that this by-law is not really enforceable.
13. Footnote #118 - requires rewriting. Will check

14. Planning Act - Comment - Could the stipulation of flood protection still be used even if the separation distance was excessive for protection from the expected flood on that drainage system. For example, Could a farmer challenge this zoning by-law by demonstrating that the building would not be located in the flood plain even though it might be still close enough to have a potential for causing water quality problems.
15. Footnote #125 - do you have a copy of this study that I could see.
16. Planning Act Comment 2nd. para. could you expand on this point about the Planning Act not acknowledging environmental agencies. It has always been my impression that MOE was an integral part of the subdivision approval procedure.
17. Planning Act Comment 2nd para. - since when do Municipalities have to compensate property owners for changes in zoning.
18. Planning Act Comment para. 4 Section 35 of the Planning Act appears to hold the key in relation to the probable success municipal zoning by-laws controlling agricultural pollution. I think the provisions of this Section should be more clearly enunciated.
19. Public Health Act - Key Prov. para. 4 does the provision which applies to stable maintenance apply to all livestock classes and does the term "municipality" refer to all levels of local govt. and have many of these municipalities enacted their own controls and thus reduced the power of the Act.
20. Drainage Act - some additional clarification required concerning the role of this Act and the Tile Drainage Act and exactly what the shortcomings are in terms of Environmental approvals under the Drainage Act.
21. Weed Control Act - your section on this Act appears to be somewhat negative about the OMAF approach to weed control emphasizing herbicides without saying conclusively that there is a better way or at least one that looks promising which should be investigated.
22. Woodlands Improvement Act - In your discussions with MNR officials was there any support for exempting windbreak planting from the requirements of the Act.

23. Agricultural Committees Act - will this be expanded upon at a later date?
24. Agricultural Rehabilitation Act - Comment will the present agreement under the Act be renewed in 1977 and if so have negotiations concerning the terms of the agreement begun.
25. Farm Pollution Advisory Committee the Ministry I assume refers to MOE.
26. Environmental Quality Sub-committee - Could I please see a copy of the report "Soil Erosion in Ontario" June 76. Do you have a list of the members of this committee - This committee according to footnote #248 seems to be already indicating that PLUARG's findings will be inconclusive in terms of quantifying the pollutant impact of soil erosion in agriculture.
27. I would like to make one general comment regarding your use of footnotes - Footnote #216 is a good example. In many cases the information which you include in the footnotes would make a valuable addition to the text. I am afraid that many people reading your report will never consult the footnotes and thus this valuable information will be lost. I think we should discuss the possibility of incorporating more of this information into the main body of the text.

  
G. Bangay

GB:bhs

cc: Ms. H. Mitchell  
K. Shikaze