



January 25, 2012

Scott Nally, Director - Ohio Environmental Protection Agency
James Zehringer, Director - Ohio Department of Natural Resources
Tony Forshey, Interim Director - Ohio Department of Agriculture

Dear Directors:

I'd like to begin by commending you for establishing the Ag Nutrient and Water Quality Working Group to bring together stakeholders for the purpose of providing input on our water quality issues here in Ohio as it relates to phosphorous. The Ohio AgriBusiness Association (OABA) has participated since the beginning of this process and appreciates the open, transparent manner in which the discussions have taken place. OABA is a 130 year old agribusiness trade association that represents Ohio's fertilizer industry, along with the grain, feed, seed and crop protection product industries. Several of our member companies also participated in the Ag Nutrient Working Group, including; The Morral Companies, Crop Production Services and The Anderson's. We are affiliated with, and supportive of, our national and international partners; The Fertilizer Institute (TFI) and the International Plant Nutrition Institute (IPNI).

OABA recognizes the 4R Nutrient Stewardship program (nutrientstewardship.com) as the foundation for all other recommendations. The 4R nutrient stewardship provides a framework to achieve cropping system goals, such as increased production, increased farmer profitability, enhanced environmental protection and improved sustainability. To achieve those goals, the 4R concept incorporates the:

- **Right Source** at the
- **Right rate**, at the
- **Right time** and in the
- **Right place.**

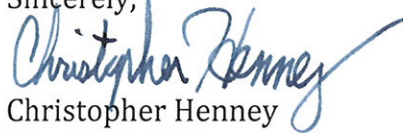
Properly managed fertilizers support cropping systems that provide economic, social and environmental benefits. On the other hand, poorly managed nutrient applications can decrease profitability and increase nutrient losses, potentially degrading water and air.

OABA believes that education, communication and outreach can address the issues we are facing without unnecessary regulation. We also recognize the environmental and public health issues that the algal blooms cause and realize that time is of the essence in addressing the phosphorous issue. With that perspective, OABA and our participating member companies, offered many suggestions throughout the working

group process. We are willing to make some sacrifices for the common good, but these sacrifices should not be at the expense of being able to provide a valued and necessary service to Ohio farmers thereby restricting agricultural production that is so badly needed around the world.

As you consider your final recommendations to Governor Kasich, please keep in mind that one size does not fit all and flexibility is crucial to maintaining a viable agricultural industry while addressing environmental and water quality concerns. OABA appreciates the opportunity to provide formal input on the process and I thank you for the time and energy you and your staff put into this process. Please don't hesitate to contact me if you have questions or seek additional input.

Sincerely,

A handwritten signature in blue ink that reads "Christopher Henney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Christopher Henney
President/CEO