CANADIAN CANOLA GROWERS ASSOCIATION

Helping Farmers Succeed

July 8, 2022

Sustainable Development Office
Environment and Climate Change Canada
200 Sacré-Coeur Boulevard 7th floor
Gatineau, Québec, K1A 0H3

Email: SDO-BDD@ec.gc.ca

Re. Public consultations on the draft 2022 to 2026 Federal Sustainable Development Strategy

The Canadian Canola Growers Association (CCGA) respectfully submits these comments on the Environment and Climate Change Canada's (ECCC) draft 2022 to 2026 Federal Sustainable Development Strategy. Canola farmers are committed to sustainability and are partners in achieving our federal sustainable development goals. They work hard to enable biodiversity on the farm, to sequester carbon in the soil and to produce more canola per acre than ever before, but need a backdrop centered around science-based decision making and an enabling policy environment that supports competitiveness. Alone, canola accounts for approximately 70% of all carbon sequestered by Canadian field crops.[1]

CCGA represents 43,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs to enhance the success of Canadian canola farmers. Canola farmers contribute significantly to Canada's economic sustainability as the industry contributes $29.9 billion[2] to Canada's economy every year and supports over 200,000 jobs[3] across the country. Canola exports were valued at $13.7 billion in 2021 with ninety percent of canola crop exported as seed, oil, or meal. Canola's contribution to the Canadian economy is undeniable and emphasizes the need for the FSDS to clearly link the environmental dimension to the economic and social aspects of sustainable development.

Canola's Sustainability

Canola farmers recognize the forward-looking nature of the Sustainable Development Goals (SDGs) and play an integral role in advancing both Canada's federal and Agenda 2030. We appreciate the Strategy being organized around the United Nations SDGs. As climate solution providers, our farmers have set ambitious sustainability targets for 2025 as their farms and future farm generations depend on it. Canola farmers will reduce their fuel usage by 18% per bushel, increase land use efficiency by 40% per bushel, sequester an additional five million tonnes of CO2, use 4R nutrient stewardship practices on 90% of canola acres, and continue to safeguard the more than 2,000 beneficial insects that call canola fields and surrounding habitat home. Our goals align with SDG 2, chiefly sub-indicator SDG 2.4 which focuses on sustainable food production systems

[1] Canola Council of Canada, Carbon Reduction & Sequestration www.canolacouncil.org/sustainability/environmental/carbon-reduction-sequestration
[2] LMC International Ltd, The Economic Impact of Canola on the Canadian Economy: 2020 Update, for the Canola Council of Canada (Oxford: 2020) at 2 online: <https://www.canolacouncil.org/download/131/economic-impact/17818/economic-impact-report-canada_december-2020>
[3] *Ibid*

and resilient agriculture practices to maintain healthy ecosystems, to improve soil quality and to increase farmers' ability to adapt and respond to climate change.

To reach these goals and to advance SDG 2, farmers need access to various innovative technologies and practices that will help them continue to advance *productive and sustainable* agriculture practices while ensuring farms remain economically viable and competitive. No one-size-fits-all approach will work.

Farmer access to innovative products and tools helped facilitate the shift to conservation tillage and will help the continued adoption of practices that will soften farmers' environmental footprint while ensuring their farms remain competitive. Herbicide-tolerant canola varieties and non-selective crop protection products provide effective weed control systems paving the way to more sustainable practices such as conservation tillage. This has led to significant environmental benefits, allowing canola farmers to sequester more carbon in the soil, improve soil cover and overall soil health, reduce erosion risk, and reduce GHG emissions from fuel usage as fewer passes are needed to be made over the field. In 1991, just 7% of Western Canadian farmland was seeded with no-till practices compared to 61%[4] in 2021.

In the immediate future, the canola sector is focused on incorporating 4R nutrient stewardship to optimize fertilizer use and precision agriculture to ensure resource-use efficiency. The goal of 4R practices (Right rate, source, time, and place), is to match nutrient supply with crop requirements, minimize nutrient losses from fields and reduce nitrous oxide (N2O) emissions all while improving agricultural productivity. Some canola farmers already utilize 4R practices but with the canola sector target of seeing 90% of canola acres utilize 4R practices by 2025, there is still more to do. Following the 4Rs will lead to improved nutrient use efficiency, which is good for both farm profitability and soil and water health. Precision agriculture technologies are designed to optimize crop input use through increased data and enhanced farm management practices. Crop rotation can also help protect soil quality, increase soil organic carbon, and manage pest and disease pressures while improving yields.

Canola farmers continue to invest in research through their provincial associations and to support a network of independent agronomists dedicated to Canadian canola. The three Prairie Provincial canola associations, in partnership with the Western Grains Research Foundation and Results Driven Agriculture Research, collaborated to enable more than $3.2 million in grower-funded canola research focused on profitability, production risk, and enhancing sustainability. In 2022, projects will look at integrated disease management, improved nitrogen management and reduced nitrous oxide emissions. CCGA also supports the Canola Council of Canada's (CCC) work to improve upon canola farmers' proven track record of adopting sustainable practices. As a successful recipient under the On-Farm Climate Action Fund, CCC will support farmers in adopting beneficial management practices focused on nitrogen management and provide financial support for those looking to implement 4R and precision agriculture practices. Increased adoption of these practices will be a contributing factor in achieving our federal sustainability goals.

CCGA is also a member the Canadian Roundtable for Sustainable Crops (CRSC). On behalf of the grain sector, the CRSC works to advance environmentally sustainability production and practices, and to collaborate across the value chain to advance grains sustainability. Core to their work is a

[4] Statistics Canada. Table 32-10-0367-01 Tillage and seeding practices, Census of Agriculture, 2021

metrics platform to track grain sustainability and provide a benchmark for our value chain's performance.

Data Requirements

As Canada advances the federal and global sustainable development goals, a common understanding of data gaps, requirements, metrics, and methodologies is needed to work collaboratively, and to efficiently to support meaningful progress towards sustainable production, as well as timely access to data. The regionality of Canadian agriculture and the diverse farm size, agronomic conditions and geographies throughout our country make it difficult to develop a one-size-fits-all approach and complicates data aggregation. Canada needs access to more robust public and private data. The timeliness of existing data, the lack of disaggregation by region and crop type, or missing data altogether are significant barriers to setting metrics and realizing progress. For example, Canada has set fertilizer emissions reduction targets, as part of efforts to take effective action on climate change, without sufficient data to measure it. Without the ability to measure current and future emissions, it is difficult to engage farmers. They can't manage what they can't measure.

The Future of Sustainable Canola

As partners, Canola farmers need to be more regularly included in the development and decision-making regarding Canada's approach to agriculture and food policy, research priorities and the larger policy environment.

An enabling policy and regulatory environment is needed to stimulate innovation that will advance sustainable agriculture. Canada's policies and regulatory framework play a pivotal role in both protecting the sustainability gains canola farmers have made and to advancing the innovation needed to further their environmental practices. A clear, predictable framework is required to incent both public and private research and attract investment to ensure Canadian famers stay competitive and have streamlined access to new technologies to aid in sustainability goals. Elements of this framework should include:

- Increased investments in research and modern technology will provide the solutions to further reduce agriculture's carbon footprint and improve environmental sustainability. Science-based decision making is critical for stimulating innovation, ensuring famers have access to tools and investing in sustainability improvements.

- Predictable and reliable risk management programs, with improved funding, will help farmers be early adopters and incentivizes new practices by alleviating the costs and risk. Adequately funding and fixing business risk management programs will help farmers remain competitive, and have the confidence to invest in their operations, which is a critical component for the growth and sustainability of our sector.

- A focus on the important role international trade plays in meeting our sustainability goals. Trade ensures robust demand attracting investment in new production practices and solutions and providing farmers the certainty to further invest in sustainability improvements on-farm. Without market access abroad, our ability to adopt innovation at home is significantly limited.

- Support for advances in new plant breeding techniques as it has the potential to create new and better varieties for farmers, consumers, and the environment alike. Plant breeding innovation is important to farmers' contribution to Canada's climate change commitments allowing for better yields, resiliency to extreme weather events, and more efficient use and fewer external resources. We must ensure research and development remains in Canada.

- New opportunities for farmers to be compensated for nature-based climate solutions that provide ecological goods and services to public such as increased biodiversity and improved carbon sequestration on the landscape. Farmers' involvement in the development of such programs will generate the needed engagement on-farm, ensure it builds on current practices and programs, and set meaningful sector goals.

Conclusion

Canola farmers are committed partners in advancing our domestic and global sustainability goals but no one solution will work for all. Canola farmers have a long history in adopting innovative and sustainable agriculture practices and are actively engaged in ways to advance the sustainability of the sector and their farms. Innovation, research, and improved management practices have and will continue to allow canola farmers to advance their environmental sustainability while continuing to strive for improvements. Meaningful collaboration supporting a science-based, enabling regulatory system and the inclusion of farmers throughout decision-making processes will be critical to the successful implementation of the FSDS as the agriculture sector has a vital role in Canada's sustainable future.

Thank you for consideration of this submission and please do not hesitate to reach out should you have additional questions.

Sincerely,

Dave Carey
Vice-President, Government & Industry Relations, CCGA

CC: Cheryl Mayer, Director, Policy Development, CCGA
Janelle Whitley, Senior Manager, Trade and Marketing Policy, CCGA
Justine Raftis, Manager, Environment and Sustainability Policy, CCGA