CANADIAN CANOLA GROWERS ASSOCIATION

Helping Farmers Succeed

July 15, 2022

Environment and Climate Change Canada
200 Sacré-Coeur Boulevard
Gatineau, Québec, K1A 0H3

Email: adaptation@ec.gc.ca

Re. Public consultations on Canada's first National Adaptation Strategy

To whom it may concern,

The Canadian Canola Growers Association (CCGA) is writing to provide comments and share canola farmers' perspective and priorities on Environment and Climate Change Canada's (ECCC) National Adaptation Strategy. 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 are working hard to enable biodiversity on the farm, sequester carbon in the soil and produce more canola per acre than ever before. With science-based decision making, an enabling policy environment and access to innovation and new technologies, farmers can continue to be adaptable and mitigate impacts of climate change while maintaining their competitiveness in the global market.

Strong and Resilient Economy

Canola's contribution to the Canadian economy is significant. Canola is Canada's most widely seeded crop, generating the largest farm cash receipts of any agricultural commodity, earning farmers over $12 billion in 2021. The canola industry contributes $29.9 billion[1] to Canada's economy every year and supports over 200,000 jobs[2] 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. The canola sector set a production target to reach 26 million tonnes and 52 bushels per acre of canola by 2025 which aligns with the Government of Canada's own objective of expanding agri-food exports to $85 billion by 2025.

The government must utilize and research opportunities that will enable growth in the sector while understanding that no one-size-fits-all approach will work for the diverse Canadian agricultural landscape. Best management practices can vary from region to region based on specific needs of the farm, soil type, water availability etc. Government should focus on improving adaptability based on vulnerabilities present at the regional level to ensure innovation is relevant.

[1] 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>
[2] *Ibid*

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Investments in innovation and new technologies advance climate resilience
Farmers need access to various innovative technologies and practices that will help them continue to advance productive, adaptable, and sustainable agriculture practices while ensuring farms remain economically viable and competitive. For example, support for advances in new plant breeding techniques, like gene editing, has the potential to create new and more resilient 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 and fewer use of external resources. We must ensure research and development remains in Canada in order for canola production to contribute to a stronger, more resilient Canadian economy. Additionally, continued work with the agri-food sector to ensure a retained, skilled, and diversified workforce, along with increased access to broadband will help farmers adopt more efficient technologies faster and enhance sustainable production, such as the use of precision agriculture technologies.

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%[3] in 2021.

Increasing investments in research and modern technology will provide the solutions to further reduce agriculture's carbon footprint and improve climate resilience. Government can look to provide canola farmers with incentives to increase adoption of best management practices and financial opportunities such as the Greenhouse Gas offset protocol for Enhanced Soil Organic Carbon. Farmer participation in such activities can advance the national goal of net-zero by 2050 by reducing emissions and improving soil organic carbon and overall soil health by retaining moisture, reducing erosion, and increasing drought resilience.

An enabling policy environment to assist in building a stronger and more resilient economy
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, and science-based decision making, is needed to stimulate innovation and new technologies that will advance climate resilient agriculture. Canada's policies and regulatory framework play a pivotal role in both protecting the environmental gains canola farmers have made and to advancing the innovation needed to further the resiliency in their practices. A clear, predictable framework is required to incent both public and private research and attract investment to ensure Canadian farmers stay competitive and have streamlined access to new technologies to aid in climate change adaptation. In addition, a common understanding of data gaps, metrics, and methodologies, and timely access to data is needed to be able to work collaboratively and efficiently support meaningful progress towards climate change adaptation and mitigation.

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

Furthermore, farmers need predictable and reliable business risk management (BRM) programs, with improved funding, to help manage risks that are beyond their control. These government programs support economic stability at the farm level which is foundational to the aspirational goals of the sector to be a sustainable driver of economic growth for Canada. Improving and increasing funding for BRM programming will help farmers remain competitive and have the confidence to invest in enhanced sustainable practices and technologies, which is a critical component for the growth and resiliency of the sector.

Thriving Natural Environment

As climate solution providers, canola 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.

As canola farmers work to achieve their sustainability goals, the government can provide farmers with new opportunities to be compensated for nature-based climate solutions that provide ecological goods and services to not only themselves but the public at large. For example, planting trees, pollinator habitat and perennial forage can help increase biodiversity by providing wildlife habitat and improve carbon sequestration on the landscape. Ensuring that farmers are incentivized and compensated for these benefits will ensure adoption and positive contribution to the environment while allowing farmers the financial stability to stay competitive and continue to contribute significantly to global food production. In addition, farmer involvement in the development of such programs will generate the needed engagement on-farm and ensure new opportunities build on current practices and programs.

Currently, the canola sector is focused on incorporating 4R nutrient stewardship to optimize fertilizer use and precision agriculture to ensure resource-use efficiency into their on-farm practices. 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. 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. Both practices can contribute to realizing our federal climate change goals and adapt to impacts from climate change, but government incentives and support would help increase adoption rate.

Disaster Resilience and Security

Canola is seeded in a variety of regions across the country, meaning farmers are exposed to a wide range of natural disasters from extreme flooding in BC to extreme drought in some prairie regions. In order to better prepare and be more resilient to these types of events, government should engage with producers in those regions to learn from and build on their experiences. Best practices and mitigation measures farmers used can be identified and shared with other farmers in the region to ultimately increase agricultural adaptation to climate impacts in those areas.

In addition, government can continue to further expand Canada's weather radar networks, as well as the development of more predictive weather stations. More certainty and coverage when it comes to predicting weather patterns will assist farmers in preparing for and being resilient against future extreme weather events. Enhanced access to high-speed internet and mobile connectivity in rural and remote communities will also play a critical role in disaster resilience and security. More than ever, today's farmers depend on reliable telecommunications services to operate their farm successfully and efficiently. It is used to access emergency services when required and operate precision agriculture technologies, which helps farmers adapt to climate change impacts by improving management of key inputs. Government should expedite access to universal internet and mobile coverage for rural and remote communities, and ensure affordable, competitive options are put in place for these areas.

Health and Well-Being

With increasing pressure to produce more canola than ever before, and after putting one of the most expensive crops into the ground in 2022, farmers need reassurance that federal policies are working to enable success on the farm and not causing unnecessary burdens. With concerns around food insecurity now at the forefront of many discussions, farmers need flexibility and support to produce more food to meet global demand while working to keep their farms sustainable for future generations. Working to ensure climate change resilience is on the regional level, not a one-size-fits-all approach, will help Canadian farmers more readily adapt and maintain the high level and quality of food production for which they are known. Canola farmers need to be more regularly involved in the development and decision-making regarding Canada's approach to agriculture and food policy. More specifically, it is necessary for agriculture to have a voice on critical decision-making committees such as ECCC's Net-Zero Advisory body.

Resilient Natural and Built Infrastructure

An adaptable and resilient transportation system is required for farmers to receive inputs and to connect our various markets (local, the Prairies, national and international). As a country, we need to prioritize and coordinate an approach to critical infrastructure. Western Canadian grain is reliant on the bulk transport system of the railways to move grain within Canada (East and West) and to the world. The importance of the Port of Vancouver as the primary export outlet for Western Canadian grain (over 60%) will continue in the coming years. This gateway will require continued investment and management will be most important to facilitate increased grain volumes and ensure supply chains remain competitive. A long-term vision and approach to prioritizing investment in critical infrastructure, to increase its resiliency, regardless of the complexities of ownership is required to support the sustainable growth of the Canadian grains sector.

Conclusion

Innovation, research, and improved management practices have and will continue to allow canola farmers to advance their environmental sustainability, climate change resiliency, and production of high-quality food. A science-based, enabling regulatory system and the inclusion of farmers throughout decision-making processes will be critical to taking the next steps in Canada's National Adaptation Strategy. Agriculture, and the canola industry in particular, is an important contributor to

the Canadian economy, and we are committed to working with you to ensure a resilient, sustainable, and prosperous future.

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

Sincerely,

Original signed by

Dave Carey
Vice-President, Government & Industry Relations
CCGA

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