

December 20, 2022

Paula Brand
Director SARA Policy
Canadian Wildlife Service, Environment and Climate Change Canada
351 Saint-Joseph Boulevard, 15th Floor
Gatineau, QC J8Y 3Z5

Email: LEPreglementations-SARAregrulations@ec.gc.ca

Re: Assessment of the status of the Monarch and two subspecies of the Western Bumble Bee (mckayi, occidentalis)

Dear Ms. Brand,

Canadian Canola Growers Association (CCGA) appreciates the opportunity to provide comments on the assessments completed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) on the status of the Monarch and two subspecies of the Western Bumble Bee (mckayi, occidentalis) and COSEWIC's recommendations related to Schedule 1 (List of Wildlife Species at Risk) of the Species at Risk Act (SARA).

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. Developed in Canada, canola is a hallmark of Canadian science and innovation and has a strong record of contributing to Canada's economy. Canola is Canada's most widely seeded crop and has the largest farm cash receipts of any agricultural commodity, earning farmers \$12 billion in 2021. Annually the canola industry contributes \$29.9 billion to the economy, provides for 207,000 Canadian jobs, and exports were valued at \$13.7 billion in 2021.

Canola farmers are committed to the environment and sustainable agriculture which is why the industry has set ambitious sustainability targets for 2025. Farmers will work to reduce their fuel usage by 18% per bushel, increase land use efficiency by 40% per bushel, sequester an additional five million tonnes of CO₂, strive to 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.

Canola farmers employ various practices on farm to ensure they use our limited resources – soil, water, land, and inputs – sustainably and efficiently, working to conserve biodiversity at the same time. Regular crop rotations maintain soil health and biodiversity, and responsible use of crop protection products also protects biodiversity and non-target species. Additionally, shelter belts, wetlands, and riparian areas imbedded in the farm landscape maintain additional wildlife habitat and species.

Canola farmers in particular work to maintain the mutually beneficial relationship that exists between the crop and pollinators. Canola is an ideal food source for honeybees, while honeybees can have a positive impact on canola production. Canola farmers work closely with beekeepers to protect bees and have a vested interest in the symbiotic relationship that exists between pollinators and the canola crop.

Upon review of the COSEWIC assessment and status report on the Monarch in Canada and Western Bumble

Bee, concerns around data limitations and gaps remain. Both assessments are dated leaving concerns around how current agriculture practices have been included in the reviews and what has changed with the species status since this date, to its advantage or detriment. Additional investment in resources should be made to fully understand the current extent of the threat on the Monarch and Western Bumble Bee in Canada. Ensuring we have more updated and robust data on the status of these species is key to understanding impacts and appropriate mitigation measures to be taken to restore species population. It would also allow for improved collaboration with the agriculture sector to better understand how to work together to protect them and where applicable, programming to assist farmers in doing so. Several factors in the assessments have the potential to be reviewed and updated including the current population status, the impact of current agricultural practices, and the overlap of agriculture and habitat.

Canola farmers care for the landscape and the species that rely on it, as their livelihood relies on the health of the environment around them. Farmers continue to use practices, such as conservation tillage practices which maintain and promote healthy soils and reduce GHG emissions, and innovations, such as herbicide-tolerant crop traits which allow for reduced input use, to continue increasing yield while using the same amount of land, sparing valuable land for biodiversity.

While canola farmers understand the importance and value of species such as the Monarch and Western Bumble Bee, more updated and fulsome data on their status in Canada is needed. There also needs to be improved collaboration with the agriculture sector, in particular farmers, to understand how to work together to protect species, especially those at risk, while sustainably growing production to meet domestic and global food and energy demands. Incentive-based solutions, such as environmental goods and services programming, can assist farmers in meeting these simultaneous priorities.

Thank you for the opportunity to share our comments on the COSEWIC assessment of the status of the Monarch and two subspecies of the Western Bumble Bee (*mckayi*, *occidentalis*). We look forward to further discussions around how to best protect biodiversity in Canada.

Thank you for consideration of this submission.

Sincerely,

Original signed by

Dave Carey
Vice-President, Government & Industry Relations
Canadian Canola Growers Association