

July 14, 2023

Environment and Climate Change Canada (ECCC)
200 Boulevard Sacré-Cœur,
Gatineau, QC, J8X 4C6

Email: nature2030@ec.gc.ca

Re: Toward a 2030 Biodiversity Strategy for Canada

To Whom It May Concern,

Canadian Canola Growers Association (CCGA) respectfully submits these comments to inform development of Canada's National 2030 Biodiversity Strategy and action plan (NBSAP). The new strategy has the opportunity to support sustainable agriculture and reinforce its inherent and critical connection to biodiversity. Canola farmers, through their commitment to biodiversity-friendly practices, can actively advance sustainable agriculture production while contributing to Canada's 2030 biodiversity strategy.

CCGA represents 43,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs to enhance their success. Canola is a strong economic contributor to family farms and our communities. Canola is the number one revenue source, earning Canadian farmers \$13.7 billion in 2022. Canadian canola exports were valued at \$14.4 billion in 2022, with ninety percent of the crop being exported as seed, oil, and meal. The canola industry contributes \$29.9 billion to Canada's economy every year and supports over 200,000 jobs across the country.

CCGA participated in the 15th Conference of the Parties to the UN Convention on Biological Diversity, co-hosting an event with Pulse Canada in the Canadian Pavillion on *Homegrown Biodiversity – How Canadian Grain Farmers Lead the Sustainable Management of Agriculture*. The event highlighted various beneficial management tools and innovation farmers already employ to conserve biodiversity on farm including efficient use of crop inputs, such as pesticides, nutrients, and water through variable rate technology, 4R nutrient stewardship practices and water monitoring, as well as farmer extension programs.

Canola farmers understand the important role biodiversity plays in their success, therefore CCGA has provided the below answers to key questions provided on the consultation forum:

What are the key features of a successful 2030 Biodiversity Strategy?

A successful 2030 biodiversity strategy should focus on an outcomes-based approach and be grounded in scientific evidence. A holistic, systems-based approach should be employed to recognize the interconnections between the food system, food production, and Canada's biodiversity. By taking a broader perspective, Environment and Climate Change Canada (ECCC) can better understand and minimize the negative impact of trade-offs and ensure that the strategy has positive impacts across the entire system. For example, there is no singular form or model of agricultural production that can meet the objectives of supporting biodiversity, instead, farmers need to be empowered with a diversity of different tools and practices. Prescriptive targets, goals and

indicators that dictate specific actions or production models on-farm may overburden farmers while failing to recognize existing actions towards sustainability within the canola industry.

Canola farmers have the potential to simultaneously address climate change and safeguard biodiversity. They can play a role in achieving the targets outlined in the Kunming-Montreal Global Biodiversity Framework (KMGBF) through beneficial management practices and innovation (BMPs). For instance, Targets 10 and 11 in the KMGBF are directly linked to the provision of ecological goods and services and nature-based climate solutions, encompassing pollination, soil fertility, water purification, and more. Target 7 emphasizes the reduction of harm to biodiversity caused by pollution risk.

While Target 7 is laudable, Canada's response should remain focused on pollution risk and must be grounded in science and evidence and be inclusive of modern agriculture. The intent of the negotiated text is not "risk of" or a blanket reduction in use. The Minister's June 20th announcement of commitments to strengthen the pesticide review process recognizes the role of pesticides, and the need to give *"farmers the tools they need to keep providing reliable access to safe and nutritious food"*. Guided by soil mapping and responsible application practices (right rate, time, method, and source), 4R nutrient stewardship minimizes nutrient loss. Additionally, increased adoption of precision agriculture and variable rate technology will drive further efficiencies in pesticide application.

Government investment and incentives are crucial to supporting farmers in further adopting biodiversity-friendly practices. Farmers take risks to their business when implementing a new practice, and therefore rely on supportive policies, financial incentives, and accessible resources to facilitate their transition and ensure their economic viability.

What are the most significant challenges and opportunities to achieving the Kunming-Montreal Global Biodiversity Framework targets in Canada?

To ensure the effectiveness of the 2030 Biodiversity Strategy, broad consultations are necessary not only with the agriculture sector but also across different government departments and agencies. AAFC's knowledge and experience of the agricultural sector should be a valued resource for ECCC as the biodiversity strategy is developed. This collaborative approach fosters policy coherence and eliminates duplication of efforts, avoiding undermining the efficacy of these interventions in promoting environmental well-being. Ensuring that various sustainability initiatives, including AAFC's Sustainable Agriculture Strategy, work in harmony is crucial. The strategies should not impose conflicting targets and indicators on farmers but should rather complement each other, enabling the sector to achieve shared goals that benefit the environment, climate, and biodiversity. In addition, numerous sector-based initiatives exist such as the 2025 Canola production and sustainability goals and the Grain Growers of Canada Road to Net Zero, both developed with input by canola farmers.

A collaborative approach with ECCC, AAFC, and farmers working together will be necessary, as well as collective recognition of the complexity and uncertainty in which farmers operate. Farm associations should be engaged in the process as they have valuable insights into on-farm realities and can provide crucial input on the required tools, including extension services, to support successful implementation of the strategy.

Are there targets where Canada is already making good progress and others where Canada should focus more attention?

Canola farmers depend on the natural landscape and understand that food production relies on the ecosystem services provided by biodiversity, such as clean air, water, climate regulation, and pollination. Farmers already

implement diverse biodiversity-supporting beneficial management practices, including crop rotations, conservation tillage, cover crops, buffer strips, shelter belts, 4R nutrient stewardship and wetland/grassland management, to support wildlife habitat and species diversity across farmland. Canola fields provide habitat for over 2,000 beneficial insects, including native pollinators and honeybees. This contributes to enhancing pollination services and promoting biodiversity within canola farming systems.

One area where Canada has made notable progress is in understanding and harnessing the potential of sustainable intensification in agriculture, recognized in Target 10 of the KMGBF. Sustainable intensification aims to maximize agricultural productivity while minimizing negative environmental impacts such as the need for additional land, by adopting innovative and efficient practices. By producing more food on existing farmland, canola farmers are reducing the pressure to convert natural habitats into agricultural land, mitigating the loss of biodiversity caused by land use change.

However, to further advance towards the goals set in Canada's new 2030 biodiversity strategy, there is a need to focus more attention on expanding the adoption of sustainable intensification practices across the agriculture sector. By scaling up the use of precision agriculture techniques and innovative tools and technologies, Canada can optimize resource efficiency, reduce environmental impacts, and enhance biodiversity conservation.

What measures should be prioritized and implemented as soon as possible to ensure we meet the 2030 targets and are on track to reach the longer-term 2050 goals?

For Canada to meet the 2030 targets and stay on course to achieve the longer-term 2050 goals set in the KMGBF, several measures should be prioritized. Two key areas that require attention are the valuing of ecosystem services and related payments to producers, and the need for research, innovation, and investments at the on-farm level. Payment for ecosystem services (PES) is an effective approach to incentivize sustainable practices that benefit biodiversity and the environment. It involves compensating farmers for the ecological services their land provides, such as carbon sequestration, water filtration, and habitat preservation. Prioritizing the establishment of robust PES programs can encourage landowners and farmers to adopt biodiversity-friendly practices within their operations or maintain and conserve natural infrastructure such as wetlands or woodlots on their farm. Governments should collaborate with stakeholders to design and implement PES frameworks that are fair, transparent, and financially viable for all parties involved. This work can build on the success of existing programs such as ALUS and continue the research in this area. Rewarding early adopters of BMPs is also important for achieving continued progress. By offering targeted support and rewards, widespread engagement and participation in the agriculture sector can be fostered.

Investing in research and innovation is also crucial to drive sustainable agricultural practices and biodiversity conservation. Research efforts should focus on areas such as precision farming, soil health, and sustainable land management. Supporting farmers with on-farm investments is essential to enhance sustainability practices. Governments should provide financial incentives and support other market-based tools to facilitate the adoption of sustainable technologies and practices. Additionally, providing access to training, technical assistance, and education programs can empower farmers to implement sustainable practices effectively, such as training for using the 4R stewardship practices.

Conclusion (what does success look like)

Canola farmers can play a pivotal role in the realization of the targets and action plans outlined in the 2030 Biodiversity Strategy should they be outcome and science based, build upon existing biodiversity practices, and recognize the ecosystem services farms provide and have the potential to provide. For the new strategy to be

successful, any focus on agriculture and biodiversity must consider the socio-economic realities for farmers as well as larger systemic factors that drive on-farm decision-making. The strategy should provide evidence on how the target outcomes will benefit biodiversity, farmers and overall sector sustainability.

In conclusion, thank you for the opportunity to participate in the survey and provide input to the National 2030 Biodiversity Strategy and action plan. CCGA looks forward to future engagements on the strategy as it develops.

Sincerely,

Original signed by

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