

March 31, 2023

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**Re: Sustainable Agriculture Strategy Discussion Document**

To Whom it May Concern,

Canadian Canola Growers Association (CCGA) respectfully submits these comments on Agriculture and Agri-Food Canada's Sustainable Agriculture Strategy (SAS) Discussion Document. As a member of the Sustainable Agriculture Strategy Advisory Committee, CCGA has been an active participant in the SAS consultation and will continue to provide significant feedback and recommendations over the course of the Strategy's development. The Advisory Committee provides an important avenue to facilitate increased, constructive engagement with Agriculture and Agri-Food Canada to ensure government policies positively impact Canada's farmers. CCGA anticipates seeing a strategy resulting from this engagement that incorporates farmers' sustainable practices to date and enables improvements, all while focusing on livelihood, competitiveness, and productivity throughout.

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<sup>1</sup> to Canada's economy every year and supports over 200,000 jobs<sup>2</sup> across the country. Additionally, market growth opportunities in the Indo-Pacific, combined with the significant announcements in the canola processing sector in 2021, and growing, show the entire industry is responding to produce and process increased volumes of canola – to meet the growing global demand for food and fuel.

Canola farmers have a long history of adopting innovative and sustainable agriculture practices and are actively engaged in ways to advance the sustainability of the sector and their farms. Modern farming practices and innovations enable biodiversity on the farm, sequester carbon in the soil, and help farmers produce more canola per acre than ever before. By having science-based decision making, an enabling policy environment and access to innovation and new technologies as core pillars of the SAS, farmers will be able to continue to adapt and mitigate impacts of climate change while maintaining their competitiveness and

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<sup>1</sup> 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](https://www.canolacouncil.org/download/131/economic-impact/17818/economic-impact-report-canada_december-2020)>

<sup>2</sup> *Ibid*

productivity. Canola farmers are committed partners in advancing Canada's sustainability goals, but no one solution will work for all, and the Sustainable Agriculture Strategy must recognize this.

Finally, as Canadian canola farmers play an important role in feeding and fueling our nation, as well as the world, economic sustainability must be at the forefront of the SAS. The canola sector has ambitious targets to meet growing demand by sustainably increasing canola production to 26 million metric tonnes by 2025, aligning with the Government of Canada's own objective of expanding agri-food exports to \$95 billion by 2028. It is imperative that the SAS enables and supports canola farmers, and the larger agriculture sector, on their way to fulfil this objective, while also improving environmental impacts. The SAS should be an enabling strategy that works with the agriculture sector, highlights its impressive track record of environmental sustainability, adequately supports innovative advancements and positions Canada as a sustainable agricultural powerhouse in the global market.

### **Recommendations for the Sustainable Agriculture Strategy**

CCGA would like to provide the following recommendations, comments, and considerations for the development of the Sustainable Agriculture Strategy. We look to highlight canola farmers' sustainability to date, along with improvements to come, as well as the importance of economic, in addition to environmental, sustainability for the long-term success of the SAS and the agriculture sector as a whole. We also highlight the need to focus on creating an enabling policy environment to bring technology and innovation to Canada and the farm landscape in a more streamlined manner, while also improving data metrics and data collection.

As mentioned in the discussion document, the SAS would be best suited as an all encompassing, umbrella strategy identifying the current government programs and initiatives promoting environment and climate action already occurring in the agriculture sector. This will also allow for a clearer understanding of where the gaps lie, whether it be data, financial, or technological gaps, and identify opportunities for improvement.

CCGA greatly appreciates the opportunity to actively collaborate in the development of the SAS, but cautions AAFC at the speed of which it is occurring. To ensure appropriate acceptance and buy in to the Strategy from farmers, it cannot be rushed but instead must be well thought through. This is especially applicable to any targets, goals and outcomes associated with the SAS, as they must be based in science and consider a farmer's return on investment (ROI) and the realities at the farm level.

Finally, the development, implementation and ultimate success of the SAS must be accompanied by a whole of government approach. As detailed below, support from additional departments and agencies will be needed to enable a more sustainable agriculture sector. The SAS should support the Pest Management Regulatory Agency in sticking to science-based decision making and increasing the use of real-world data, therefore decreasing reliance on overly conservative models, through a stably funded pan-Canadian water monitoring program. In addition, Finance Canada increasing financial support for the sector, Canadian Food Inspection Agency releasing their guidance on plant breeding innovation, and Environment and Climate Change Canada working closely with AAFC are all necessary to ensure the long-term viability of the SAS.

### **Environmental Sustainability**

Canola farmers are committed to the highest standards of environmental health, setting ambitious sustainability targets for 2025. Farmers are working to reduce their fuel usage by 18% per bushel, increase land use efficiency by 40% per bushel, sequester an additional five million tonnes of CO<sub>2</sub>, 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. Additionally, 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.

As canola farmers work to achieve their sustainability goals, the SAS can look to further support 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. Planting trees, pollinator habitat and perennial forage on marginal lands can help increase biodiversity by providing wildlife habitat and improving carbon sequestration on the landscape. Incentivizing and compensating farmers 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. The development of the Resilient Agriculture Landscapes Program (RALP) is a positive start, although program parameters have yet to be outlined by provinces. Environmental goods and services programs also need to be supported long-term in order to provide the greatest benefits, yet also provide farmers with the flexibility to make decisions about their farmland in the future. Renewable and flexible agreements would be ideal under these types of programs.

In addition, canola is a climate solutions provider that efficiently sequesters carbon due to its high yields and deep roots. Government initiatives that utilize climate solutions on farm, such as agriculture carbon offset protocols, should be prioritized by the SAS. The agriculture sector has been awaiting the federal government's Greenhouse Gas Offset Protocol for enhanced soil organic carbon as well as the development of others including one related to fertilizer emissions, with no anticipated release dates in sight. Farmer participation in such activities could advance the sustainability of the sector by reducing emissions and improving soil organic carbon and overall soil health by retaining moisture, reducing erosion, and increasing drought resilience. CCGA encourages the SAS to coordinate and expedite the development and release of these protocols.

As the discussion document states, 'Canada's total agricultural GHG emissions have stayed relatively stable since 2005, while the sector's contribution to Canada's gross domestic product has increased over the same time period; in other words, the emission intensity has been declining<sup>3</sup>.' The SAS should be focused on highlighting this accomplishment around emissions intensity and positioning Canada in the global market as a low carbon intense crop while also recognizing farmers through the aforementioned programs.

That being said, there is often a concern amongst farmers around rewarding the late adopters and providing no support to those who have opted into some of these practices prior to a government program start date. Careful consideration is needed to ensure equity amongst adopters.

### Economic Sustainability

CCGA was pleased to see economics and farmer livelihoods referenced throughout the Sustainable Agriculture Strategy Discussion Document. As environmental sustainability is the focus of the strategy, it cannot come without meaningful consideration of economic sustainability. No recommendations, goals, or outcomes of the SAS should be considered without ensuring they are economically viable for a farm business. With the increase in demand expected in the coming years for canola, including as a biofuel feedstock, canola has an opportunity beyond the farmgate to reduce emissions as canola-based biofuel emits 90% less

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<sup>3</sup> AAFC calculations based on data from the 2022 National Inventory Report and Statistics Canada, Gross Domestic Product at Basic Prices (2022).

greenhouse gas emissions than conventional diesel<sup>4</sup>. Farmers need to maintain a viable business to produce the crop needed to help governments meet emissions reductions commitments and to meet domestic and global demands.

Canola farmers already invest significantly in their operations, in capital, time, as well as research and development, use of new technologies, and equipment. That being said, there can be significant risks for canola farmers associated with implementing new practices where minimal research or economic studies demonstrating an ROI to a farmer's business have been conducted. The SAS must continue to work with the industry to invest in research which will provide farmers with a better understanding of how new technologies and practices can lead to greater profitability without compromising yields.

Overall, increases in funding will be needed for improved data collection, technology mobilization and recognition for adoption of beneficial management practices. The level of additional funding supporting the execution of the SAS must match the level of ambition associated with the goals and outcomes of the strategy and must be supported by the appropriate, long-term, flexible financial support for the sector.

### *An Enabling Regulatory Framework and Science-Based Decision Making*

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 any new federal policies or strategies are working to enable success on the farm and are based in science.

A transparent, predictable, and science-based policy and regulatory framework is key for the long-term success of a sustainable agriculture sector. 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 environmental and climate change commitments allowing for better yields, resiliency to extreme weather events, and more efficient and fewer use of external resources. Supporting advances in new plant breeding techniques is an important component to enabling the sector's growth and sustainability, yet we still await the Canadian Food Inspection Agency announcement on its guidance on Plants with Novel Traits. Health Canada has already published its updated guidance in May of 2022 with CFIA's guidance still yet to be published. Without this finalization of a predictable, risk-based regulatory pathway, Canada, and ultimately the agriculture sector, is not on par with our global competitors.

In addition, an enabling regulatory system is required to ensure research and investment remains in Canada. The SAS, and ultimately AAFC, must work with other departments and agencies to ensure that Canada is not perceived as a jurisdiction with increasingly high levels of regulatory uncertainty. This will ultimately disincentivize registrants from commercializing chemistries and tech startups from establishing in Canada and make our international counterparts more appealing. 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.

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 sustainability of their practices. Without a predictable regulatory system and access to safe, innovative crop protection products,

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<sup>4</sup> As per GHGenius, V4.03

canola farmers' ability to improve their environmental sustainability while remaining competitive in a global market will be jeopardized.

### Technology, Innovation & Research

Significant investments in innovation and new technologies are essential to improve environmental sustainability and advance climate resilience and adaptation in the agriculture sector. 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.

Farmer access to innovative products and tools have, and will continue to, aid in the adoption of practices that will soften farmers' environmental footprint while ensuring their farms remain competitive. For example, the introduction of herbicide-tolerant canola enabled the adoption of reduced tillage practices in the prairie landscape. These conservation tillage practices have 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%<sup>5</sup> in 2021. Access to crop protection products helped facilitate the shift to conservation tillage and access to new tools will help the continued adoption of practices that will soften farmers' environmental footprint while ensuring their farms remain competitive globally.

With Canada's ambitious environmental goals, such as net-zero by 2050, there is concern that the SAS will focus solely on environmental pathways forward without significant focus on the economic impacts these new technologies and innovations may have on farm. While canola farmers have a long history in adopting innovative and sustainable agriculture practices already, the SAS must support them further on this pathway. This is especially true as AAFC's own Strategic Plan for Science states that 'currently, there is no clear net-zero pathway for agriculture that does not compromise food production for Canada and the growing global population as well as the long-term viability of Canada's agriculture sector.' The SAS has a place here to facilitate, fund and coordinate long-term efforts in technology and innovation development and mobilization across the country. In addition, the SAS should work to ensure current and future programs allow for flexibility and consider regionality and on farm realities when they are developed and implemented.

#### *A. Rural Access to Internet and Mobile Coverage*

Enhanced access to high-speed internet and mobile connectivity in rural and remote communities will play a critical role in farmers' ability to operate and utilize new on-farm technologies, including precision agriculture, which helps farmers adapt to climate change impacts by improving management of key inputs. The SAS can provide support and bring light to this issue, especially as new technologies will be amplified and relied on as farmers work to improve environmental sustainability to 2050. Expedited access to universal internet and mobile coverage for rural and remote communities is needed in addition to ensuring affordable, competitive options are put in place for these areas.

#### *B. Improvements in and Access to Predictive Weather Tools*

The SAS can also support the expansion of 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. Improvements in

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<sup>5</sup> Statistics Canada. Table 32-10-0367-01 Tillage and seeding practices, Census of Agriculture, 2021

predictive weather tools will assist farmers in making decisions on the farm that are best for not only yield and productivity but also for the environment. For example, weather stations with N<sub>2</sub>O sensors would help with predictive modelling and weather-based decisions that affect N<sub>2</sub>O emissions.

### Knowledge and Technology Transfer

There is a general lack of resources, knowledgeable labour, and agronomists available to assist with knowledge transfer, especially as new technology and practices are introduced at an increasingly rapid pace. There is an opportunity for the SAS to support not only the development but also the introduction of new technology (e.g., machinery, mapping, and plant breeding innovations) that will be required to further improve the agriculture sector's environmental sustainability by focusing on knowledge transfer and an overall increase in learning opportunities for farm businesses. Ensuring the SAS stresses the importance of knowledge transfer will assist farmers with understanding how to use new technologies to their full potential and ensure that new practices and technologies are fully leveraged. In addition, this focus area must be flexible as this Strategy is meant to be evergreen, taking the agriculture sector out to 2050, and therefore there will be technologies we are not even aware of now. This means flexibility will be key in terms of funding and support as new technologies become available and need to be mobilized on the landscape at likely accelerated timelines.

### Improved Data Collection, Coordination and Protection

Improved data collection, modelling and coordination is necessary for the SAS, and its encompassing goals, targets, and outcomes, to be successful. Without knowledge of a baseline starting point from which to measure improvements, it makes it difficult to improve farmer acceptance and willingness to participate in the SAS. The SAS, acting as an overarching, umbrella strategy within which to house all agriculture sector related data and programs, will allow for a more common understanding of the data gaps and improvements needed in the sector. The SAS should focus on the need to use newer, more robust data sources and methods in order to appropriately measure meaningful progress towards sustainable production. 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 stressing the need for 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, the fertilizer emission reduction target has been set without sufficient data to measure it. Over-reliance on fertilizer use rates (linked primarily to sales data) and models that do not consider on-farm improvements such as 4R related practices, despite being the key practices recommended to reduce emissions, result in an overly simplistic picture of related emissions. It becomes extremely difficult to engage farmers in targets, goals, and outcomes when they can't manage what isn't currently being measured. Any outcomes associated with goals of the SAS must ensure that methods to improve environmental sustainability are being accurately accounted for in the data to ensure improvements can be recognized appropriately.

Increased funding is needed for not only improving landscape level data, to accurately capture the benefits of on farm practices, but also to improve data coordination across the work that many researchers are completing throughout the country. Coordinating the projects underway will provide for a better understanding of data gaps and assist with knowledge mobilization from the research level to the farmgate.

In addition, current data sets, indexes, metrics platforms, such as the Canadian Roundtable for Sustainable Crops Metrics Platform, Fertilizer Use Survey, The National Index on Agri-Food Performance, and other

federal and provincial data sources should be leveraged to ensure work is not duplicated when legitimate sources have collected the data already. The improvement of data collection and coordination should not come at the expense of farmer time by significantly increasing their administrative burden.

Finally, data protection is key for improving data availability, collection, and coordination. As data collection through technology, surveys and other methods is increasing, a significant focus must be on how to protect and safeguard personal information and provide assurance data will only be used for its intended purpose.

### Conclusion

The Canadian agriculture sector has the potential to be a global leader in sustainable production long into the future but only with the support of an enabling, science-based strategy, not one that acts as an additional burden on farmers while they look to produce more food to meet domestic and global demands. The SAS should not only be a whole of government, evergreen, umbrella strategy, but also be used as a tool to identify gaps in technology, research and data in the sector, and highlight Canada's low carbon intense crops to better position Canada in the global market as the sustainable agriculture powerhouse it is.

CCGA would like to stress that increased funding supporting technology, innovation and research is necessary as it 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 continued inclusion of farmers throughout decision-making processes will also be critical. Canola farmers are committed to working together to ensure a resilient, sustainable, and prosperous future, but the SAS 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.

CCGA hopes through the SAS and the Advisory Committee, improvements can be made to agri-environmental policy while also building trust and engagement with the sector as we collectively seek to improve environmental outcomes while increasing productivity and farmer competitiveness.

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

Sincerely,

Original signed by

Rick White  
President & CEO  
Canadian Canola Growers Association

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