

August 4, 2022

Hon. Marie-Claude Bibeau, MP, PC  
Minister of Agriculture and Agri-Food  
1341 Baseline Road  
Ottawa, Ontario K1A 0C5

Dear Minister Bibeau:

Keystone Agricultural Producers (KAP) is writing to provide our opinion to Agriculture and Agri-Food Canada's consultation on reducing GHG emissions from synthetic fertilizer.

In 2017, the federal Advisory Council on Economic Growth provided multiple recommendations to government on ways to significantly improve Canada's economic growth. The council identified the agri-food sector as one of the key catalysts for significant growth potential. Furthermore, the Sustainable Canadian Agricultural Partnership includes a targeted goal of \$95 billion in export revenues by 2028. Bold economic growth in this sector is possible, however meeting this target under the proposed 30 percent reduction provides additional impediments for the sector given the sustainable farm practices already implemented.

Sustainable farm practices already implemented by Manitoba farmers may include enhanced efficiency fertilizers and inhibitors, cover cropping, increased split application, precision agriculture techniques, nutrient management planning and transitioning from fall to spring applied fertilizer. These practices result in reduced nitrous oxide emissions, yet farmers in the province who have already incorporated these practices are not fully recognized in the federal proposal.

In the July 22<sup>nd</sup> FPT news release the "Ministers agreed to continue to work together and with the sector's value chain to build on producer's efforts to reduce fertilizer-related emissions while maintaining competitiveness and Canada's reputation as a top producer of quality crops." As an organization we are committed to collaborating with government on creating strategies that are supported by empirical data that provide a practical, affordable and economically viable pathway for producers to reduce nitrous oxide emissions.

The recent public discourse and attention on the fertilizer emissions reduction in the past few weeks has brought Canadian farmers into the international spotlight. This spotlight has done little to showcase the responsible and sustainable farming practices that are already adopted by across the province and country. Canadian grains and oilseeds have an international reputation of being high quality, safe, nutritious and sustainably grown. Unfortunately, the public discourse in the past few weeks has not displayed Canadian agriculture in a positive light rather it has hurt public trust along with the Canadian agricultural brand.

Reducing nitrous oxide emissions from synthetic fertilizer – while obtaining broad support from farmers – is a complex and arduous undertaking. A voluntary approach along with ample federal funding available is the preferred pathway. This needs to be paired with achievable targets that do not cast

agriculture in a negative light but rather emphasize the positive advances already made while focusing on continuous improvement within the sector.

KAP strongly recommends adjusting the target that has been established to address farmers' concerns. Rather than framing the conversation around reductions in fertilizer use, targets should be established based on overall nitrous oxide emissions. Furthermore, the target for nitrous oxide emissions should only be established following comprehensive cross-country consultations with farmers and be established in a way that takes into account their past efforts to improve sustainability and the goals for increasing Canadian agricultural production capacity.

Farmers in Manitoba are disappointed that the target of a 30 percent reduction in emissions from fertilizer has been announced with limited input from the agricultural community. The policy setting process must be on hold to begin direct consultations with farmers and their representatives in each province and region of the country. This will offset the perception that farmers are being targeted by their government and provide you and your department with an opportunity to incorporate the innovative approaches that will come from listening directly to producers.

Given the nature of the announcement, farmers are also concerned they will have limits imposed on them by the Government of Canada. Direct cross-country consultations by you and your officials will allow you the opportunity to stress that there will be no mandatory limits imposed to achieve the targets your government has established. Active engagement by producers can only be effectively achieved through a collaborative approach and will be impeded by a perception that new regulatory burdens are coming.

We look forward to working with your department on this issue as well as other topics such as public trust and sustainability. The future of Canada's agriculture sector depends on ensuring we approach every issue with a science-based, collaborative approach involving all stakeholders, and this issue provides us all with an opportunity to show the world that we can do just that.

Thank you for your time and support of Manitoba agriculture.

Sincerely,

A handwritten signature in cursive script that reads "Brenna Mahoney". The signature is written in black ink and is positioned above the typed name and title.

Brenna Mahoney  
General Manager, Keystone Agricultural Producers

cc: Hon. Derek Johnson, Minister of Agriculture, Manitoba  
Mary Robinson, President, Canadian Federation of Agriculture