

March 31, 2023

RE: Sustainable Agriculture Strategy

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for producers on issues that affect agriculture. KAP represents and promotes the interests of over 4,400 producers and 18 commodity associations.

KAP is pleased to provide feedback to Agriculture and Agri-Food Canada (AAFC) regarding its development of a sustainable agriculture strategy. Sustainability is an important topic for Manitoba producers. Recent data from Statistics Canada show an increase in adoption of beneficial management practices in Manitoba in the areas of zero-till, manure management, shelterbelts and in-field winter grazing. Sustainability in agriculture encompasses environmental aspects but equally important are the social and economic aspects of sustainability as well. The recommendations below take into consideration all three of the aspects of sustainability. Therefore, it is important for AAFC to weigh in all three of these aspects when drafting a framework to meet their strategic goals.

RECOMMENDATION: Apply a long-term incentive-based approach and increase funding to BMPs when aiming to achieve policy objectives.

Using incentives to achieve policy objectives is the preferred approach by producers compared to using a regulatory approach. The application of increasing incentives to on farm practices is diverse and can be applied to key areas of the strategy that include soil health, water, climate adaptation and resilience and climate change mitigation. These incentives need to be long-term and should consider the cost of adoption, return on investment and the ecological goods and services provided.

RECOMMENDATION: Set achievable and voluntary targets based on collaborative governance with industry.

Proposed outcomes from the strategy vary from a reduction in GHG emissions to an improved water management approach in agriculture. An effective approach to setting specific targets that are agreeable by agricultural stakeholders is through collaborative governance. Collaborative governance provides a structure that fosters consensus building and trust to achieve desired outcomes. This model would reduce misunderstandings between all stakeholders, prevent conflicting targets from being set (e.g., 30% reduction in fertilizer emissions) and reduce regulatory pressure resulting in a focus on topics that matter most to each stakeholder.

RECOMMENDATION: Leverage the positive outcomes already occurring in the sector.

While focusing on what can be improved in the sector it is equally important for government to recognize what has already been accomplished in agriculture. Looking at the positive outcomes already

achieved in agriculture can assist government on deciding where to best allocate future resources. These positive outcomes include sequestering 4.2 megatons of CO2 per year in 2019, a 55.2% increase in zero-till adoption in Manitoba in 2021, 35 million acres of grasslands managed by beef producers across Canada, increase use of legumes in crop rotations and consistent productivity increases while occurring under the context of a rising adoption of modern technologies that reduces input costs and environmental footprint.

RECOMMENDATION: Focus on emphasizing food security.

The COVID-19 pandemic and the escalation of conflict in Ukraine has brought an increased public focus on food security. It is predicted that global food demand will increase around 35% to 56% by 2050. Although the dimensions of food security are complex, producers play a vital role in ensuring the supply side of food availability remains met. Incorporating a food security framework for Canadians and for our trading partners would provide value while emphasizing the important role Canadian agriculture can play on this issue.

RECOMMENDATION: Increase funding in research and innovation to meet strategy goals.

Ambitious goals and targets set by the federal government will require substantial and sustainable funding into research and innovation to achieve desired outcomes. Compared to other OECD countries, Canada lags behind in terms of capital spent on research and development as a total of its GDP. Canada's portion of R&D compared to its GDP has been in steady decline since 2001. Recent legislation in America (e.g., Inflation Reduction Act, CHIPS & Science Act) has jump-started additional R&D and threatens to place Canada at an economic disadvantage if more funding is not allocated to R&D.

RECOMMENDATION: Recognize the diversity of agriculture across Canada.

A one size fits all strategy will not be effective in achieving its goals. Canadian agriculture is diverse involving different animals and plants grown and raised across a variety of various soil types and climatic conditions. A policy approach involving one region in Canada may not be as effective when applied in a different region. A holistic approach is required that incorporates the various needs of each region and commodity type that would assist in developing effective programs and policies.

RECOMMENDATION: Support practices that foster public trust.

The success of Canadian agriculture is partly determined by the trust Canadians place in their food system. Transparency and communication are key components of public trust. The public needs to have a better understanding of the work producers do and the regulatory practices they are required to follow. This would lead to increased assurance in food safety and animal and plant health. Government must continually communicate openly with consumers while educating them on Canadian agriculture and the context that food is produced in.

RECOMMENDATION: Collaborate with all levels of government.

The programs and policies that will be influenced by this strategy will have a measured impact on all levels of government. Municipal, provincial and federal governments all play an important role in implementing future programs and policies. Climatic conditions in agriculture are not hindered by local, provincial or international boundaries. Policies set at the national level may be contradictory or

perceived as a mismatch when placed within municipal or provincial policies. Collaborative efforts will be key in assisting decision makers in creating a regulatory framework that emphasizes profitability, sustainability and resiliency.

RECOMMENDATION: Improve knowledge transfer between stakeholders to achieve strategy goals.

Successful outcomes will not occur unless sufficient education on key issues and how to achieve these goals is provided. Producers across the country have different degrees of knowledge of government policies, new technologies and industry best practices. For example, 37% of western Canadian producers are not aware of 4R Nutrient Stewardship. Government needs to be transparent with its goals and provide an adequate body of knowledge on how to achieve these goals. Coordination with all relevant stakeholders will ensure knowledge transfer flows to all relevant parties.

RECOMMENDATION: Ensure reasonable cost sharing structures exists between governments and producers.

Producers recognize their financial responsibility when it comes to participating in cost sharing programs offered by government. Cost sharing structures exist for BMPs, AgriInsurance, AgriRecovery or adopting innovative technology, and governments are a key component in the success of these programs. These cost sharing structures need to be flexible and focused on regional sustainability priorities. Recently, some cost sharing programs offered by AAFC (e.g., plant breeding) changed from a government/producer 75:25 cost share to a 50:50 cost share. Government support for cost sharing programs needs to be increased if technological advancements, research gains and sustainable improvements are to continue in the future.

RECOMMENDATION: Improve current data to better inform the agriculture strategy.

Good policy making cannot be done without current, precise and relevant data. Data gaps currently exist in agriculture (e.g., precise N₂O emissions, farm management practices) that create challenges in setting benchmarks and targets. One path forward is to better leverage current research, data collection and indexes (e.g., National Index on Agri-Food Performance) and collaborate with stakeholders to improve the collection and analysis of data. A data strategy within the sustainable agriculture strategy may be required to identify gaps and improvements needed for the most pertinent issues. The improvement of data also requires transparency and data privacy that would improve trust and acceptance among producers.

Thank you for the opportunity to provide feedback on the Canadian sustainable agriculture strategy. If you have any questions about this submission, please contact KAP Policy Manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,



Jill Verwey
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