



KEYSTONE AGRICULTURAL PRODUCERS

February 10, 2025

Environmental Linkages Pilot Feedback

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 all Manitoba producers and 20 commodity associations. KAP is pleased to respond to MASC's proposed environmental linkages pilot.

Forages on Marginal Land

The idea of increasing forages on marginal could increase both soil organic matter and fertility. But questions remain whether adequate producer enrollment will make the program successful. Given the choice between annual crops and forages, producers will often choose annual crops due to economics. Producers will be less inclined to switch from annual grains to forages unless a significant incentive is offered. And not all producers own marginal land. In addition to the proposed criteria, MASC should consider providing incentives to producers who currently grow forages on marginal land thereby reducing crop conversion and maintaining the added environmental benefits of forages.

Cover Crops

Considering the wetness some areas of Manitoba experiences during the spring, the proposal of an incentive for adding cover crops on EMI acres could prove beneficial for subsequent growing seasons. Despite the benefits of this proposal, similar concerns exist when compared to the forages' proposal—Will the incentives be enough to drive enrollment? For example, a 500-acre-flooded field at \$5 an acre would result in a \$2500 discount for next year's premium. Producers would already receive the EMI basic coverage at \$75, totalling \$37,500 in this example. We have doubts whether the added incentive, compounded with EMI basic coverage and operating costs associated with sowing cover crops, would lead to significant enrollment. And dry years would certainly decrease enrollment.

Crop Diversification

The crop diversification option appears as the least onerous but covers the fewest producers under the current requirement. Producers understand the benefits of crop diversification: increased biodiversity, improved crop yields, and reduced disease pressures. Yet the criterion means fewer than two percent of producer contracts would qualify for this BMP. More acres would mean more benefits with crop diversity. We recommend that MASC change the crop requirement to three crops or fewer. This would mean that more producers would qualify if they grew a fourth crop. That change would not only encompass additional producers but also improve the environmental benefits as well.

Overall, MASC should take into consideration the number of applicants and acres covered when deciding on a pilot project. An ideal pilot project should include several options. This means offering all three options simultaneously for one year. Offering three options would provide MASC with real-world data, allow for a better understanding of the positives and negatives with each option, and improve confidence in selecting an option on a long-term basis. Modelling and surveys can only go so far.

Thus, the most effective option for subsequent years would be based on real-world data. The administrative burden may exceed the benefits in this situation. If so, MASC should review its goals with the program and determine whether the estimated producer enrollment rates and acres covered match these goals. KAP supports beneficial management practices that are voluntary and incentive based. But we recognize the importance of providing adequate incentives and understanding the limitations producers may encounter when reviewing each option.

Thank you for providing the opportunity to provide feedback on the environmental linkages pilot. If you have any questions about this submission, please contact KAP policy manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Hornby". The signature is fluid and cursive, with a large loop at the end.

Colin Hornby

General Manager, Keystone Agricultural Producers Inc.