

Agriculture and Agri-Food Canada
1341 Baseline Road, Ottawa, ON K1A 0C5
Via Email: aafc.fertilizer-engrais.aac@agr.gc.ca

August 31, 2022

Re: Manitoba Canola Growers Association Response to Discussion Document – Reducing emissions arising from the application of fertilizer in Canada’s agriculture sector

To whom it may concern,

The Manitoba Canola Growers Association (MCGA) appreciates the opportunity to respond to the discussion document: *Reducing emissions arising from the application of fertilizer in Canada’s agriculture sector*, as published by Agriculture and Agri-Food Canada.

MCGA represents the 7,500 farmers in Manitoba who include canola in their crop rotation. We have been actively involved in discussions regarding the government’s proposed plan to reduce fertilizer emissions 30% below 2020 levels by 2030 and raised significant questions from farmers of how this goal would be achieved. Fertilizer is second only to water as the most critical factor impacting the productivity and yield of canola, and farmers are receiving conflicting messaging around increasing productivity at the same time that the use of key inputs to achieve that increase is being called into question. For example, approximately \$2 billion of expanded canola processing capacity has been announced since 2021, with the potential for significant new job creation and economic opportunity throughout the value chain from farm gate to transportation to processing. For these investments to become a reality, industry needs to be confident in farmers’ ability to produce more canola.

As stewards of the land and natural resources available to them, our members recognize the importance of protecting those resources for generations to come. However, our farmer members and Directors remain adamant that any strategy the government seeks to implement that reduces the emissions from fertilizer must continue to ensure fertilizer rates are sufficient to maintain the sustainability of healthy crop production, farm profitability, and soil health, while supporting farmers to increase production to meet the growing global demand for food, biofuel, and other agricultural products.

We have been offered assurances by multiple levels of government that this goal is not intended to be achieved by cutting fertilizer rates, and we continue to reiterate the critical importance of the government holding to this commitment.



Further, we work closely with our national counterparts, and support the detailed submissions provided by the Canola Council of Canada, the Canadian Canola Growers Association, and the Grain Growers of Canada. The background, concerns, barriers and solutions reflected in their comments are representative of the comments we have heard from our own members across Manitoba.

In addition to those submissions, MCGA would emphasize the following as key points in our position.

Farmers Will Need Significant Support

Farmers are innovators and inherently focused on long term sustainability in order to continue their businesses for generations. Farmers have already invested significant effort in recent decades to improve their sustainability, gaining measurably in fuel efficiency, production efficiency, reducing the amount of land required to produce a bushel of crop, increasing carbon sequestration, improving soil health, improving air and water quality, and safeguarding beneficial insects.

As experts in managing natural resources to produce crops, farmers continuously explore ways to sustainably improve their businesses for the long term. Many of the technologies, equipment and practices that currently exist to reduce emissions have been made available to farmers, and if they have not been broadly adopted already, it has been for reasons that make them unsustainable for farm businesses, such as high cost, limited or unreliable supply, limited return on investment, limited or inconsistent success in their specific farm ecosystem, additional labour or training requirements, difficulty to use, or other reasons that make that technology, equipment or practice a less viable option.

Adopting additional technologies, equipment and practices to achieve the emissions reduction goals set in this relatively short time frame will be a significant cost to farmers that they will have no way of recouping. Achieving this target will require considerable support for farmers, not just with direct financial support to offset the costs of adopting what is often a more costly input option, piece of equipment, or production practice, but also support with:

- Agronomic research funding to confirm how any new technology, equipment or production method impacts their farm system, and the most effective means of utilizing it to ensure the continued quality and quantity of crop production, maintenance of soil health, and protection of biodiversity and other natural resources;
- Business models and economic analysis to support farmers' decision to adopt new technology, equipment or production methods into their farm business, so they can consider the long-term financial impact and make a sound business decision;



- Agronomic extension support and training for farmers and farm workers in order to adopt new technology, equipment or practices that fit their farming ecosystem and business model;
- Recognition of the practices that farmers have already adopted since 2020 and long beforehand, including 4R Nutrient Stewardship practices, to ensure the gains that farmers have already made in production efficiency and production intensity are considered in the calculation of progress toward the goal;
- Significant and immediate investment to enable accurate measurement of emissions, both direct and particularly indirect if the strategy intends to include it. The current target is based on what we understand to be inaccurate and generalized measures of emissions. If farmers are to have any hope of succeeding, an accurate starting benchmark and accurate measurement of progress is absolutely necessary, particularly where farmers are being asked to take on additional risk and cost in order to adopt new technology, equipment and practices above and beyond what they have already invested in.
- Compensation for the adoption of higher cost technology, equipment or practices that result in a yield reduction or the same yield for a higher input cost. Farmers should not bear the opportunity cost alone in order to change practices that benefit society;
- Flexibility in how a strategy is implemented to ensure farmers can continue to manage the variable needs found on every farm, in every field, and each season. The past two years are prime examples of how extreme and variable growing conditions and markets can be. Flexibility must be maintained to allow for fall application, broadcast applications or other practices that might not be optimal from an emissions standpoint but are required in order to produce a crop in specific circumstances;
- Goals for fertilizer manufacturers to produce more emissions-efficient and cost-friendly fertilizer products, as in many ways the emissions of fertilizer products are out of the control of farmers who use the products most affordable, effective and available to them;
- Recognition that in order to produce the essential goods of food, biofuel, and others agricultural products, some emissions are necessary. Some leeway must be afforded to food and biofuel producers above and beyond producers of non-essential goods who are also contributing emissions;
- Finally, farmers have many factors to weigh when considering a change to how they operate, not the least of which being the impact on the long-term sustainability of the natural resources and the businesses they manage. Farmers will need time to consider options, test them, communicate the results, and if they work, customize and adopt new technology, equipment or practices, and the timeline to accomplish measurable results by 2030 is extremely unrealistic. Many research programs last 3-5 years, if not longer to measure the impacts on climate or emissions, plus upwards of 2 to 3 years to extend the results and try them on-farm. In the case of equipment or technology, once it is proven to work on-farm the



farmer then needs time to save money to invest in the change, as costs are typically high. With only seven growing seasons left to accomplish this paradigm shift in farming practices by 2030, there is not enough time to identify options and complete the research, communicate the results, and build adoption rates. Realizing the impact from newly adopted changes will take even longer, and more realistically would not be seen in full until after 2030.

Continued Consultation with Farmers is Paramount

MCGA has greatly appreciated the myriad opportunities to engage with various levels of government on the emissions reduction proposal. As this public consultation closes and AAFC digs into the feedback, we look forward to further consultations as AAFC develops the plan for how to achieve their targets. This phase will be even more important to ensure farmers are fully engaged in order to ground-truth and consider all the impacts on-farm long before a plan is launched.

Active involvement in the issue of climate and sustainability-related policy development is a top priority for the MCGA board. This issue is too complex and fraught with misinformation in the farming community to be successfully developed and implemented without regular and meaningful involvement from, and communication to, farmers.

We are available to discuss this issue further as needed and at your convenience.

Sincerely,



Delaney Ross Burtnack
Executive Director, Manitoba Canola Growers Association
P: 204-230-6293
E: delaney@canolagrowers.com

Cc: Charles Fossay, MCGA President

