

Canadian Roundtable for Sustainable Crops (CRSC)
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Attention: Susie Miller, Executive Director, CRSC

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RE: Manitoba Canola Growers Association Response to the *Sustainability in the Marketplace – Need and opportunity for action* Consultation

Dear Susie,

Thank you for the recent consultation on the January 2022 publication, “Sustainability in the Marketplace – Need and opportunity for action”. Manitoba Canola Growers was among the groups seeking the development of this document as an important and overlooked step to engage farmers in a deeper understanding of the drivers behind the first attempt at a Code of Practice. We were pleased that the report was thorough, and the consultation allowed farmers to comment and get clarity on the details provided.

Following discussion with our board, we would like to provide this feedback on where MCGA stands on the issue of sustainability in grain production.

1. MCGA supports the general concept of a sustainability code

While the MCGA board was not supportive of the initial Code of Practice, citing concern with structure, scope, tone, and governance in developing the first document, we remain supportive of the concept of a code of practice or a guide of standard operating procedures that helps market our farm produce, and helps communicate the many and varied efforts that agriculture has already undertaken to further enhance sustainability. Grain and food companies need the ability to tell the story of how growers are committed to sustainability. We recognize that the time has come for action here, and farmers need to manage this initiative in a way that unintended consequences are minimized.

2. Farmers must be in control of drafting the sustainability code, just as any other group of professionals would be in charge of drafting a code for their industry

With a focus on farmers, and not any other member of the value chain in this proposed sustainability code, it needs to be developed and directed by farmers. Involvement from groups that are seen to be influenced by interest groups outside of farming has led to damage in farmers’ trust of the development of the document, as other participants in the value chain do not have the same interests, limitations and risks as farmers. It is a clear conflict of interest to have outside groups develop a sustainability code outlining how farmers do and should run their businesses.

Further, there is a perception among farmers that those further along the value chain intend to solve their sustainability problems and corporate commitments by downloading them onto farmers, such as the goals committed to by various corporations to reduce their Scope 3 emissions, and by various levels of government to manage sustainability issues like emissions. These goals appear to have been set without consultation, and perhaps without consideration of the realities of farming, leaving many farmers somewhere between skeptical and offended as they are now brought into the conversation about how farmers are going to achieve these corporation or government-driven goals. Farmer trust is damaged, and a concerted effort will be needed to regain their trust and buy-in on whatever next steps are taken to address this issue.

Further to this, our board noted that farmers need to take meaningful steps to gain broader respect as experts in our field, and ideally the next version of a sustainability code would seek to position farmers as experts in sustainably managing their businesses for generations, and as experts in managing and stewarding nature for food production.

3. Key features to include in a sustainability code

The MCGA outlined several key features that they believe should be included in a sustainability code:

- The sustainability code should identify that crops are grown across Canada with many diverse growing conditions, soil types and management practices. It should be clear that the purpose of the sustainability code is to provide greater transparency about how crops are grown and the sustainable practices already in place.
- The sustainability code should identify that most Provinces already have in place regulations dealing with practices like manure application, buffer zones and timing of fertilizer application that farmers must follow.
- The sustainability code should focus on the decades of progress made in sustainable practices and commitment to following existing legislation and regulations.
- The sustainability code should be simple, minimal, basic, and scoped at the 30,000-foot level.
- The sustainability code should identify what practices and improvements are in farmers' control (Scope 1 and 2 emissions), and what are not in their control (Scope 3), perhaps also including who farmers would need to seek improvement from for reducing Scope 3 emissions on the farm.
- The various modules should have:
 - an introduction identifying the changes in agriculture that have occurred over the last 20 or 25 years. For example, the practice of summerfallow has declined by XX% and zero till acres have increased from XX acres to XX+ acres.
 - A section identifying the many practices most farmers follow, such as crop rotation.
 - A section identifying practices that some producers follow when practical, such as applying manure or using cover crops.
- Any targets or goals set must be aggregated and be far enough in the future to be achievable (or adjusted). For example: XX% of prairie cropland under minimum tillage practices by 20XX, not a target based on XX% of an individual farmer's cropland.

- Recommendations and practices must be compatible with an efficient bulk handling system.
- There must not be concessions on drainage, land use or farming practices beyond existing regulations. Drainage management should not be overly specific, especially when identifying various erosion control practices.
- The sustainability code should be accompanied by a self assessment checklist for the farmer

4. Other Considerations

The MCGA Board also reiterated that farmers must be compensated or incentivized for increased compliance or sustainability costs that they can't recoup from the marketplace. Farmers are savvy business owners, and will not make a business decision that threatens the economic sustainability of their business (such as increasing an unrecoverable cost, or choosing an input that reduces revenue potential by reducing yield) without clear justification. There are many solutions currently available that could achieve progress toward sustainability goals, but if they have not yet been adopted, then they are cost prohibitive or do not make sense in a farmers' business model. While not specific to a sustainability code, government funding may be required to assist farmers to transition to adopting more sustainable practices as may be outlined in a code, and every recommendation must be accompanied by the economic impacts necessary to support farmers' decisions to adopt a new practice.

Thank you for the opportunity to provide comments on this consultation, and for the work of the Canadian Roundtable for Sustainable Crops to further outline the drivers behind this work. We are deeply engaged in the many initiatives and consultations that are currently ongoing related to sustainability, and would welcome the opportunity to discuss our recommendations further.

Sincerely,



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