Ontario Federation of Agriculture

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Strategic Emergency Management Framework for Agriculture
Policy, Planning and Emergency Management
Agriculture and Agri-Food Canada
Floor 5, Room 216
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The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario and Canadian economy forward.

The agricultural sector faces more risk than almost any other industry. Many of these risks are outside the control of individual producers and have the potential to turn into emergency situations which can threaten the sustainability of individual producers businesses and the broader agricultural sector in Canada, in the absence of an effective and timely response to emergency situations. OFA fully supports the need to formalize a national strategy for managing emergency situations within the Canadian agricultural sector. OFA is pleased to provide the following comments and suggestions on the proposed emergency management framework.

Summary of Recommendations

Broad Points/Guiding Principles

- Establish detailed roles, responsibilities and action plans for all stakeholder groups
- Effectively communicate these details to stakeholder groups
- Make the proper resources available to all stakeholder groups to ensure that they can effectively play their role

Bio-Security and Disease Transmission

- Funding dollars for research and adaptation of agricultural surveillance measures
- Standardization of biosecurity training and practices across all government departments, ministries and agencies

BRM Programs

- Low participation in BRM programming compromises the agricultural industry's ability to be resilient after a disaster. To encourage increased participation in these programs, OFA proposes the following changes to the current programs under the next Agricultural Policy Framework:

AgriStability

- Restore AgriStability's payment trigger to when program year margins fall below 85% of a farmer's historical reference margins
- Eliminate AgriStability's Reference Margin Limitation provisions and explore alternative approaches that limit payments for producers in profitable situations while ensuring coverage of allowable expenses for those facing negative margins
- Waive the AgriStability fee for first 5 years of enrolment in the program in order to encourage beginning farmers' participation
- Remove the negative margin viability test to help producers facing severe, short-term income declines

AgriInvest

- Increase the basic maximum matched producer contribution rate to 1.5% of Allowable Net Sales
- Establish a $100,000 annual maximum for matching contributions
- Encourage investments into a set of pre-approved, proactive risk mitigation and income generation investment opportunities by allowing producers to access their own AgriInvest contributions without triggering taxable government funds
- To encourage participation and support beginning farmers, provide a government-only unmatched (kickstart) deposit of 3.25% of Allowable Net Sales, spread over the first 5 years, for a new Agri-Invest account, for new participants only

AgriRecovery

- Amend AgriRecovery to cover multiple years of extraordinary costs/losses resulting from the short-term impacts of a single event or recurring events that could not be effectively addressed through alternative mechanisms
- Programs delivered through AgriRecovery must be clearly defined as disaster-related and be decoupled from other Business Risk Management programs so that disaster payments are not clawed back under another program
- AgriRecovery must define clear and precise rules such that it can respond quickly to exceptional events and must recognize precedents set by similar previous disasters covered by the framework
- The federal Minister must be granted the capacity to assemble a joint disaster assessment task force, in addition to the existing authority that resides with provincial agriculture ministers

- Federal and provincial officials must coordinate initial assessments to ensure that initial provincial data collection and subsequent analyses are sufficient for a comprehensive assessment, in order to speed up the assessment process

Rural/Farm Infrastructure

Infrastructure Resiliency to Climate Change

- Amend building codes as needed to adapt to the impact of climate variation and extreme weather events
- Establish dedicated funding for rural infrastructure projects aimed at adapting to climate change challenges
- Establish funding to assist farmers with financial costs associated with adapting farm buildings/structures to meet climate change challenges

Dedicated Funding for Rural Infrastructure

- Increase dedicated funding for "rural" infrastructure
- Work with provincial governments for increased transfers to rural municipalities
- Ensure that future funding programs prioritize innovative projects that deliver infrastructure needs in a cost efficient manner
- Financing for these infrastructure needs must be financed outside of the next Agricultural Policy Framework
- Future construction and maintenance of transportation infrastructure, particularly in rural areas must be able to accommodate the needs of modern agricultural equipment

Consultation Questions

What are your suggestions to improve the prevention and mitigation of risks in the Canadian Agriculture sector?

The Draft Strategic Emergency Management Framework for Canadian Agriculture is a good starting point for discussion and provides high level information on the roles and responsibilities of the various stakeholders. However, considerable work needs to be done to clearly articulate the roles and responsibilities of these stakeholders. When an emergency situation occurs, all stakeholders must know the exact stepsIf Ontario farmers are to remain competitive in the global market, they must be able to work land and get their goods to market in an efficient and time effective manner. A stock of rural transportation infrastructure that accommodates the size of modern agricultural equipment is an essential requirement that they are expected to take. It is particularly important that the chain of command is well established and all stakeholders know who will be directing traffic on the ground during an emergency.

In addition to establishing detailed roles and responsibilities, there is a need to effectively communicate to stakeholders, ensuring that they understand and accept their role and responsibilities in an emergency situation. Failure to effectively communicate with stakeholders will undermine the utility of any emergency management framework.

Once the roles and responsibilities of stakeholders have been clearly defined and effectively communicated, resources must be readily available for stakeholders to carry out their responsibilities effectively.

When it comes to risk prevention and mitigation, there are two specific issues OFA would like to see addressed within this Framework:

1. Development of a national strategy on biosecurity and disease transmission
2. Upgrading rural infrastructure to meet the challenges of climate change

Biosecurity and Disease Transmission

Ontario and Canadian farmers have had an excellent record of following Best Management Practices, leading to an exceptional record of animal and plant health in Canada. However, it is vital that federal, provincial, and territorial (FPT) governments be better prepared to prevent, mitigate and respond to the next biosecurity emergency. Plant and animal disease has the potential to devastatingly impact producers, the agri-food industry, the Canadian economy, and the general population. A national strategy addressing the challenges of biosecurity and disease transmission is of critical importance to emergency management in the Canadian agricultural sector.

Surveillance

Surveillance serves the function of early detection of disease, and must be a critical component of the prevention strategy within the Emergency Management Framework for Agriculture in Canada. If a disease can be identified early and dealt with in a relatively small geographical area, the costs associated with the issue are minor. If the disease is not identified until it has spread to different areas of the country, the costs to address the disease and the threat to health and safety rises exponentially.

Surveillance also plays a huge role in mitigating the impacts of a disease outbreak. Proper surveillance is needed to monitor the spread of disease. Surveillance will allow us to know critical information, such as: the rate at which a disease is spreading, the geographical directions it is spreading, and the populations that could be impacted by the disease spread. This information is vital in any attempt to mitigate the damages and risk involved with any disease outbreak.

Funding dollars for research and adaptation of agricultural surveillance measures such as Be Seen Be Safe, must be made available by FPT governments as part of a national biosecurity strategy.

Standardization of Government Biosecurity Training

Farmers in Ontario and Canada rely on strict biosecurity protocols on their farms to maintain the health and safety of their animals. Disregarding these protocols can have severe consequences on animal health, individual farm operations and the entire agricultural sector.

Ontario and Canadian farmers understand that they will be subject to compliance inspections on occasion by regulatory agencies, and that some have legislated powers of entry to enter farm properties. In Ontario, it has come to our attention that in many cases government personnel making farm visits are neither familiar with, nor following, biosecurity protocols.

It is a serious concern that any visitor on a farm has the potential to bring a new disease onto the farm, and/or carry a disease off of the farm property. Any biosecurity plan is only as strong as the weakest link, which is why it is critical that *anyone* visiting a farm follow the proper biosecurity protocols.

OFA has recently requested that the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) conduct a comprehensive review of the biosecurity protocols in place across all ministries and agencies with the authority to make on-farm visits. We recommended to OMAFRA that this review should investigate the following:

- The alignment and adherence to a standardized set of protocols to ensure that all regulatory enforcement personnel are receiving the same information
- The frequency of training of enforcement personnel in farm biosecurity
- The complaint process in the event a farmer witnesses enforcement personnel not following the standard practices

Should this review uncover an inconsistency in the protocols and training across regulatory agencies, OFA has requested that OMAFRA provide a standardized set of acceptable biosecurity protocols and a recommended training schedule to agencies and other ministries. Furthermore, the biosecurity training status of all regulatory agencies should be posted on the OMAFRA biosecurity webpage and made available in an OMAFRA factsheet or printed format.

These biosecurity threats are not limited to Ontario farms or Ontario government personnel. Therefore, a similar comprehensive review of the biosecurity protocols in place across all federal departments and agencies should be conducted and should be coordinated with OMAFRA and OMAFRA's counterpart in each province/territory across Canada.

Infrastructure Resiliency to Climate Change

Climate change has the potential to significantly impact the effectiveness and lifespan of the already degraded infrastructure in rural Canada. Transportation, buildings, and water management infrastructure are particularly vulnerable to the impacts of climate change and extreme weather events. Existing infrastructure may suffer increased damage because it was built to the specifications of a different climate reality.

Infrastructure in rural areas, and particularly transportation infrastructure, is vital to maintaining our food system. Efficient transportation infrastructure is the key to productive supply chains. The entirety of our agri-food value chain depends on the successful operation of our transportation system.

From the flow of inputs to producers, to the delivery of products to processors, and ultimately the consumer, we rely on an effective and efficient water, road and rail transportation system. Canada's energy and water infrastructure will face a number of future challenges from increased demand of a growing population, as well as damage caused by more frequent extreme weather events.
Adaptive measures by both industry and municipalities must be taken to limit the impacts of climate change and strengthen the resiliency of rural infrastructure. This will be costly and

require government investment in climate-proofing infrastructure and a deeper integration of climate change considerations into infrastructure decision making, design and maintenance.

Water management is an area that is critical to agricultural production and will face significant challenges as a result of climate change. To ensure producers have sufficient access to water, as well as ability to contain and remove excess water, increased government investments in water management infrastructure, which includes wetlands will be needed to mitigate the impacts of climate change.

The Canadian government must ensure the climate change readiness of the country`s rural infrastructure, and needs to invest in the planning, design, construction, and maintenance of this infrastructure. Failure to take proactive measures and make the necessary capital investments will result in reactive measures in the future. Making proactive investments to adapting our infrastructure for the impacts of climate change will provide substantial long-term cost savings and increased public safety.

What are your suggestions to improve collaborative action and cooperation?

In order for effective collaboration to take place, each stakeholder group must not only be aware of their own roles and responsibilities, but they must also be aware of the roles and responsibilities of other stakeholders. Producer organizations such as OFA and the Canadian Federation of Agriculture (CFA) can play an important role in communicating information between primary producers and all levels of government.

An annual forum where representatives from all stakeholder groups can gather to exchange information and ideas would provide a formal channel to encourage collaboration and develop new methods to strengthen the Emergency Management Framework for Agriculture in Canada.

What are your suggestions to improve sector resilience?

A critical component of an Emergency Management Framework for Canadian Agriculture is the suite of government-funded Business Risk Management tools available to producers. For those risks that cannot be addressed through on-farm management practices, access to effective risk management programs provides Canadian producers with the income stability they need to continue investing in innovative technologies, to adapt to evolving market demands, and maintain long-term economic growth.

Business Risk Management programs play a key role in helping producers recover from disaster, but only if producers continue to participate in these programs. Growing Forward 2's 2013 reduction in support and coverage levels provided under AgriStability have eroded producer confidence in the current suite of Business Risk Management programs. Low participation in these programs compromises the agriculture sector's ability to withstand disaster situations. Significant amendments are required to restore confidence, increase producer participation and ensure a credible Business Risk Management suite of programs is available to Canadian producers.

There are specific changes that can be made to the existing Business Risk Management programs that will allow producers to mitigate and recover from disaster and emergency situations.

AgriStability

AgriStability must provide funding on a timely basis to lessen the short-term impacts of significant income losses. Significant income loss is understood to represent any variation in income below 85% of a producer's historic reference margin that also results in a lack of profitability that year.

For those industries facing significant, but short-term, income declines due to factors beyond their control, AgriStability must still be available to provide meaningful support and assistance. In order to ensure that this support remains available, the negative margin viability test must be removed to help producers facing severe, short-term income declines.

To encourage participation in AgriStability, and reduce systemic risk within the industry, beginning farmers, in the first 5 years of operation, must see their AgriStability fees waived. These fees tie up valuable capital that is vital to investing in the future viability of the operation.

These changes will increase the effectiveness of the AgriStability program, restore producers' faith in the program, help manage the level of risk and will ensure that the AgriStability program will play an important role in the new Emergency Management Framework for Canadian agriculture.

AgriInvest

While the AgriInvest program has had success in helping producers manage small income declines, a shift in focus is required to ensure the AgriInvest program acts as a tool for mitigating risk.

The AgriInvest program is bankable for producers and governments. Enhancing support and capacity within the AgriInvest program provides a platform to facilitate market-based adjustments and proactive investments in risk mitigation.

The AgriInvest program must match producer contributions up to 1.5% of allowable net sales, and the government-matched contribution limit must also be amended to allow for matchable annual contributions up to $100,000.

To assist producers with the unique risks facing the early years of an operation, AgriInvest must provide a government-only unmatched deposit of 3.25% of Allowable Net Sales spread over the first 5 years for those with a new Agri-Invest account.

The mandatory initial withdrawal of all taxable government contributions limits the capacity for producers to invest in the sector due to producers' limiting their withdrawals to those periods that will not result in increased taxation. While this does encourage maintenance of a "rainy day" fund, these same tax considerations are a barrier to proactive investment of AgriInvest funds. Recognizing AgriInvest as a strategic tool for investment in risk mitigation, program design should remove the tax barriers that prevent proactive investment of producer contributions.

AgriRecovery

The AgriRecovery Framework can play a significant role in the proposed Emergency Management Framework for Canadian Agriculture, if the following changes are made. AgriRecovery must define clear and precise rules, such that it can respond quickly to

exceptional events and take into account all losses not covered by programs such as AgriStability and AgrInsurance. To ensure consistent application and delivery of the framework across provinces, industry requests for the covering of extraordinary costs must recognize precedents set by similar previous disasters covered by the framework.

In addition, the effects of disasters do not limit themselves to a particular province and often cross provincial boundaries. The AgriRecovery Framework must ensure consistent treatment across provinces facing the same disaster scenario. To incorporate these principles into the program, the federal minister must be granted the capacity to assemble a joint disaster assessment task force, in addition to the existing authority that resides with provincial agriculture ministers.

To ensure this consistency in practice, federal and provincial officials must coordinate initial assessments to ensure that initial provincial data collection and subsequent analyses are sufficient for a comprehensive assessment and speed up the assessment process. Requests for additional information between governments and gaps in initial data collection delay the development of appropriate disaster programs. In addition, this process increases the probability that the assistance will not accurately address the entire scope of extraordinary costs resulting from the disaster, leaving producers without vital assistance when needed.

The AgriRecovery Framework is a source of support for producers to address extraordinary costs required to resume operations after a disaster beyond their control. Recognizing the exceptional nature of these events, programs delivered through AgriRecovery must be clearly defined in program design as disaster-related, and be decoupled from other Business Risk Management programs so that disaster payments are not clawed back under another program.

These extraordinary costs often evolve following a disaster and can span multiple years. AgriRecovery programs must recognize the fluency of these situations and not be limited to paying out one time only, when extraordinary costs continue to develop over the subsequent years. In order to develop programs that adequately address producers' needs and communicate program availability, relevant producer groups must be engaged in the program design process. This will ensure that the benefits are properly targeted, and that these targets are clearly communicated to affected producers.
The AgriRecovery Framework must be perceived as a last resort, where other programs fail to adequately address extraordinary costs associated with disasters. Following a disaster, a formal process must be undertaken to assess what additional measures must be made to address and/or mitigate this risk in the future. In instances of repeated, aberrant disaster situations that closely follow one another, and where subsequent mitigation efforts are unable to provide a sufficient response, AgriRecovery programs must remain available to assist affected producers with extraordinary recovery costs.

Dedicated Funding for Rural Infrastructure

To ensure a stock of adequate infrastructure that addresses the unique needs of communities across the country, the Canadian government must ensure that rural communities have adequate funding to maintain the infrastructure in their region.

In 2013, Ontario Municipalities received $1.18 billion in funding targeted at infrastructure costs from the federal government. This is down from a high of over $1.6 billion in 2010. In 2013, federal infrastructure funding represented less than 8% of total infrastructure expenditures in

Ontario. The Canadian government should work with the Ontario government to establish increased federal funding for rural infrastructure in Ontario.
OFA applauds the $272 million investment in municipal infrastructure by each of the federal and provincial governments through the Small Communities Fund (SCF). This investment is a positive step in the right direction.

However, these programs must be viewed as the first steps in a larger effort to revitalize municipal infrastructure in Ontario. The Association of Municipalities Ontario (AMO) estimates Ontario municipalities face a deficit of $60 billion in infrastructure funding over the next 10 years. Roads, bridges and water infrastructure are in particularly dire need, accounting for over $40 billion of the total deficit.

Additionally, both the Ontario government and the federal government must clearly distinguish "small" communities from "rural" communities when designing funding programs. The SCF's primary eligibility requirement is that communities have a population under 100,000 residents. As a result, truly "rural" communities receive a fraction of the funding, as rural communities do not come close to 100,000 residents and formula based funding is allocated based on population.

Another critical issue as it relates to infrastructure is the ability for transportation infrastructure to accommodate farm equipment. To better understand the needs of modern farm equipment on the road, consider the following;

- A 4-wheel drive tractor is approximately 20 feet long, 10 feet wide with a wheel base of 10 feet.
- A tractor mounted 6-row planter has an approximate transport width of over 17 feet.
- A Combine has a width up to 14.5 feet and a length of nearly 33 feet and;
- An air seeder, towed by a tractor has an overall length of 90 feet.

A stock of rural transportation infrastructure that accommodates the size of modern agricultural equipment is an essential requirement under an emergency management framework for Canadian agriculture.

There is no shortage of worthy infrastructure projects competing for a limited amount of funding. This is especially true in rural communities, which have a disproportionately large stock of infrastructure compared to their local tax base. It is critical to ensure that future infrastructure funding prioritizes innovative projects that deliver infrastructure needs in a cost effective manner. For example if a project proposal acknowledges that rather than an expensive concrete bridge, a steel culvert would meet local infrastructure needs at a fraction of the cost, this should be taken into account to maximize the return on infrastructure funding.

Finally, the Federal Gas Tax fund must continue to fund infrastructure projects of all kinds, and ensure that rural municipalities are treated fairly under the program. Funding for rural infrastructure must be financed outside of the next Agricultural Policy Framework. These infrastructure projects are vital, not only for agricultural producers but to all of rural Canadian communities.

Do the proposed strategies outlined in the draft Framework resonate with you?

OFA supports the themes of enhanced prevention and mitigation, collaborative action and building sector resilience as they are all essential to the long-term Emergency Management

capacity of Canadian agriculture. However, much more work is needed to move this Framework from a document outlining high-level desired outcomes to an actionable plan that ensures all relevant stakeholder groups are prepared to respond to the next Canadian agricultural emergency. To ensure this framework achieves its highest potential, OFA urges the FPT governments to act on the recommendations made in response to the previous three questions of this consultation.

What activities/practices do you or your members currently undertake that you see as contributing to emergency management?

Ontario farmers are excellent stewards of the land and have been actively engaging in Best Management Practices for years. OFA, through its involvement in the Ontario Farm Environmental Coalition (OFEC), has been instrumental in the development and implementation of the Environmental Farm Plan (EFP) Program in Ontario. The EFP Program is a voluntary, non-regulatory means by which to encourage farmers to assess their current production practices, identify any areas of concern, and develop strategies to address those concerns.

In the past year, OFA has partnered with other farm and food processing groups in the creation of the Farm, Food and Beyond initiative. This initiative will oversee the development of a whole farm sustainability plan; addressing environmental practices, and considering economic and social issues that impact the sustainability of the agriculture industry. This initiative evolved from the Environmental Farm Plan, bolstering the plan to incde *economic* and *social* pillars, to pull together the complete tenets of sustainability: profitability, planet and people.

Ontario farmers will continue to be leaders in sustainability which includes the development of a national Emergency Management Framework for Canadian Agriculture.

Please add any additional suggestions you would like to see considered in this framework.

OFA strongly suggests two additional issues that must be addressed in this framework:

1. Inclusion of municipal governments
2. Further clarification of what constitutes an emergency

Inclusion of municipal governments

The Emergency Management Framework for Canadian Agriculture must include municipalities as a key stakeholder. Effectively preventing and responding to agricultural emergency situations will require an understanding of local issues. Municipalities will have considerable knowledge of the local geographical area, the conditions of transportation infrastructure, and are more likely to have existing knowledge/relations with local farm and agri-businesses. As the details of this Emergency Management Framework fall into place, Municipalities must be included as a key stakeholder, with their role clearly defined. Municipalities must know their responsibilities and specifications on when and how to interact with other levels of government, primary producers and producer organizations in response to an emergency situation.

Clarification of what constitutes an emergency

Annex 3 of the consultation document defines an emergency as “a present or imminent event that requires prompt coordination of actions concerning persons or property to protect the health, safety, or welfare of people, or to limit damage to property or the environment”.

OFA suggests that any definition of an emergency under this framework be expanded to include any event that has the potential to materially impact Canadian agricultural production.

Yours sincerely,

Don McCabe
President