

March 31, 2023

Agriculture and Agri-Food Canada
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Submitted via email to: aafc.sas-sad.aac@agr.gc.ca

RE: Sustainable Agriculture Strategy Consultation

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to Agriculture and Agri-Food Canada (AAFC) regarding the proposed Sustainable Agriculture Strategy. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA is committed to promoting sustainability in the agricultural sector. Our Mission Statement, "Farms and Food Forever" reflects this commitment. Our advocacy work consistently champions the three interactive components of sustainability - economic profitability, environmental stewardship, and social responsibility - for all farmers of Ontario regardless of size, commodity, or production system.

In general, OFA supports the concept of a Sustainable Agriculture Strategy to bring together existing agricultural policy in a more strategic and cohesive manner, and as a means of investigating and addressing policy gaps to further advance a healthy and sustainable agricultural sector in Canada. The agricultural sector remains a primary industry dependent on relatively stable and predictable water and temperature cycles. While farmers are inherently adaptable and familiar with adjusting their practices to respond to cyclical variability in water and temperature regimes, climate change introduces isolated extremes to this variability that pose significant challenges and risk to production. We appreciate that addressing environmental sustainability in Canadian agriculture and enhancing resilience to the potential impacts of climate change features prominently in the Strategy.

Issue 1: What do we want to achieve through a Sustainable Agriculture Strategy?

Canadian farmers are on the front lines of our changing climate, responding to new risks for growing crops and raising animals as they arise. There is no doubt that the challenges to farming caused by climate change is an issue that weighs heavily on their minds, but it is certainly not the only issue. We understand that this initiative was originally proposed as the Green Agricultural Plan with the intent to take an integrated approach to addressing agri-environmental issues in the sector, and that the name was updated to the Sustainable Agriculture Strategy to better include social and economic considerations into strategic action on climate change.

While the discussion document touches on some aspects economic and social sustainability, OFA strongly advises that these need to take a much more prominent role in the Sustainable Agriculture Strategy and that it recognizes the deep interconnectedness between economic and social sustainability and environmental performance.

Canada has great potential to be a global leader in the production of sustainable agri-food products to Canadians and consumers around the world and succeed in the context of an increasingly unpredictable climate. Ensuring resilience to climate change and supporting sustainable economic and productivity growth must be central to the Strategy. To be environmentally sustainable, a farm must be economically viable. Resiliency in the agricultural sector should not only pursue increased readiness to the potential impacts of climate change, but also incorporate resilience in the face of supply chain disruptions, geopolitical pressures, and market volatility. The Strategy's goals must acknowledge the critical role that farm profitability and competitiveness play in enabling investments in further sustainability.

Issue 2: Approaches to overcome barriers and advance environmental outcomes in the sector

In August 2022, OFA submitted comments to the AAFC regarding the Fertilizer Emissions Reduction Target consultations. Our comments centred on what we believe is needed to facilitate the adoption of environmentally beneficial management practices (BMPs) among farmers that will result in greenhouse gas emissions reduction from fertilizer use and increase the sectors' ability to sequester carbon in agriculturally managed soils. Many of our comments to that consultation are relevant here, including recommendations to:

- Maximize frequent, meaningful engagement between Government and the agricultural sector
- Significantly improve communications between government and agricultural producers and work towards shared understanding of initiatives and their intentions;
- Provide greater access to quality, unbiased information through extension services;
- Promote soil health and the 4R Nutrient Stewardship Program;
- Broaden cost-shared programming to include recognition and incentives for early adopters;
- Remove the application of Part I: Fuel Charge of the Greenhouse Gas Pollution Pricing Act on all fuels used in agricultural production, and place the price on greenhouse gases where it can be an effective tool to change behaviour;
- Prioritize the expansion of reliable broadband internet and mobile service to rural areas to facilitate the adoption of precision agricultural technologies
- Build data collection systems that ensure proper protocols are in place to protect the privacy of farmers and minimize fears that their data could be used inappropriately or to invoke regulations; and
- Consider the impact on the mental health and welfare of farmers when proposing changes to normal farm production practices.

Sector Engagement and Communications

OFA is pleased to see the AAFC elected to create a diverse Advisory Committee of producer organizations, industry associations, and environmental non-governmental organizations to help guide the development of the Sustainable Agriculture Strategy. We recommend that this engagement with leaders in the agricultural sector does not end once the Strategy is finalized and that similar, perhaps regionally-based advisory committees are created to guide and facilitate implementation of various sustainability initiatives.

A key to moving the Sustainable Agriculture Strategy forward and advancing environmental performance outcomes is to ensure that government intentions are clearly communicated to farmers with little room for ambiguity. The trust relationship between government and producers needs to be strong for initiatives under the Sustainable Agriculture Strategy to be successful. OFA recommends that AAFC engage producer and commodity organizations when designing and executing communications to the farm community and leverage existing trusted sources of information. Emphasis should be placed on helping farmers and landowners with diverse goals think about how to introduce climate science or how to adapt to future climate impacts into their management plans.

Increasingly, we recognize the need to improve the information flow to stakeholders by translating the science into useful tools and into products that will satisfy multiple policy and production goals. There is also a need to improve the flow of information back from stakeholders to federal agencies. Increasing the two-way flow of information can help better align science and technology developments with the decision support needs of farm managers.

De-Risking the Adoption of New Beneficial Management Practices and Technology through Cost-shared Support

Fundamentally, we see environmental performance in the agricultural sector flowing from stable, economically sustainable farm operations. Climate change risks exist in the context of a whole host of other issues that create risk for agricultural production, the interaction of issues determines capacity to focus on improving environmental performance. There is a need for the Strategy to acknowledge the interaction of domestic and global economic risks and their affect on farmers' ability to meet environmental sustainability goals.

Paramount in any attempt to influence behaviour is to recognize that the nature of farming presents a unique set of circumstances that are not seen in other sectors of the Canadian economy. At its core, farming involves the management of biological processes and living organisms that are subject to the vagaries of climatic and environmental conditions. Farming attempts to control the growth of plants and animals under conditions that are rarely under a farmers' control.

Agricultural production is a highly competitive industry in Canada; the vast majority of producers have small margins and are price-takers in the market. That is, as a producer there is no control over the cost of inputs, nor the price of their product in the domestic or global marketplace. Every year, climate and related soil conditions offer a very short window of opportunity to start a crop for optimum production. Similarly, the length and intensity of harvest varies, driven by a number of climatic or environmental conditions. In addition to issues of seasonality and climate, the agriculture sector trades in a highly perishable product. Many of the good things grown in Ontario have a narrow window between emergence, harvest and spoilage – the speed at which various commodities can begin to lose value before, during and after harvest creates a unique management context.

Within this context, adoption of practices that generate increased risk or add costs are unlikely to succeed without effective supports and a deep understanding of the challenges farmers face bringing products to market. Successful adaptation involves appreciating the potential economic impacts of adopting new management practices. A best management practice will not be adopted without careful consideration of how it will fit practically into a farm's current business structure and how it will suit existing farm equipment and expertise. New tools and resources for farmers are needed to support better on-farm decision making, not only to assess changes to soil health management, but also to assess the economic impacts of these changes.

However, funding supports must be accessible to be successful. Funding program applications must be easy to complete and require reasonable, easy-to-access supporting documentation. Additionally, intake windows must be open for an appropriate amount of time (three to four weeks) that do not occur at the busiest windows of farming activity (avoid spring planting and fall harvest seasons). Winter timing often works best for producers to complete funding applications.

There is only one paragraph in the discussion document that speaks directly to the inherent risks of agricultural production and that adopting costly new practices or technologies that improve environmental outcomes can increase risk for farm families. Risk in agricultural production and risk management is an incredibly important piece that deserve more significantly attention in the sustainable agriculture discussion.

OFA recommends that levels of financial support to farmers must be significantly enhanced, eligibility requirements and funding options must be flexible and broadened to allow the greatest number of farms to apply, early adopters of efficiencies and BMPs must also be eligible for support, and application processes must be streamlined and offered in a timely manner that supports agricultural production.

Setting of Future Sustainability Targets for the Agricultural Sector

OFA agrees that targets can be an effective way to encourage action, align focus, and guide current and future resource allocation towards improving environmental performance. We are not opposed to setting of new targets under the Sustainable Agriculture Strategy; however, any new targets intended for the Canadian agriculture sector that flow from this Strategy must:

- Be based on the best available science;
- Balance aspiration towards action on climate change with the risks and realities of agricultural production;
- Include realistic timelines and actions based on meaningful consultation with farmers and industry stakeholders; and
- Reflect the diversity of farming practices, the diversity of climate and growing conditions, and the growing diversity of beneficial management practices available to farmers to reduce emissions or enhance carbon sequestration;
- Not negatively impact production or the competitiveness of farmers in the global marketplace.

Furthermore, participation by farmers in activities related to achieving new sustainability targets must remain voluntary, recognizing the broad range of capacities of farmers to adopt new practices and technologies.

OFA appreciates the opportunity to comment on the proposed Sustainable Agriculture Strategy. We look forward to working with AAFC to fully develop the Strategy for the benefit of Canada's farmers and our shared environment.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food Canada
Keith Currie, President, Canadian Federation of Agriculture
OFA Board of Directors