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Agriculture and Agri-Food Canada
1341 Baseline Road
Ottawa, ON K1A 0C5

Re: Discussion Document – Reducing emissions arising from the application of fertilizer in Canada’s agriculture sector

Via Email – aafc.fertilizer-engrais.aac@agr.gc.ca

To whom it may concern,

On behalf of the Prairie Oat Growers Association (POGA) I am pleased to provide feedback to the Government of Canada’s discussion document on the proposed reduction of emissions from fertilizer use on Canadian farms.

POGA represents approximately 10,000 oat growers across the three Prairie Provinces of Alberta, Saskatchewan and Manitoba, and thus represents about 90% of Canadian oat growers. POGA is the Canadian voice for oats on national and international issues, policies and programs that impact oat farmers.

Canada is the largest exporter of oats in the world and the demand for oats is increasing rapidly worldwide. Canadian oat milling capacity is increasing at a record pace; over five times that of wheat. In addition, new oat product innovations, like oat milk, have resulted in a further increase in the demand for oats in Canada, and worldwide. These oat innovations help boost the Canadian economy by creating jobs and economic opportunities. Overall, oats contribute over \$8 billion annually to Canada’s GDP.

Canadian farmers are on the front line of climate change, and our on-farm practices are vital to domestic and international food security. Farmers have been on the leading edge of innovation for decades. From the latest crop genetics to crop protection products and beneficial management practices, farmers invest in tools that are good for their soil, their bottom line, and the sustainability of their land.

On-farm practices are continuously evolving, but in light of geopolitical circumstances, farmers face the challenge of balancing the demand for increased productivity with the request for greater “sustainability” without a definition of sustainability or knowledge that the current policy initiatives take into account what is already being done to keep our farms and families safe and productive for generations to come. We believe that necessary on-farm practices can be made better through innovation – but all innovation needs research, investment, and ultimately time. With the threat of global food insecurity looming, we must develop an approach that aligns the imminent need for increased food production with the long-term goal of increasing on-farm sustainability.

Nitrogen fertilizer is essential to the success of individual farm operations and, in turn, the Canadian economy. On a grain farm, one of the largest annual expenses is fertilizer. It’s an expensive risk to outlay so much money months before farmers know if it will payoff, and is not taken lightly, but it’s been proven worthwhile as it consistently increases yields and improves profit potential. As such, it is an input expense that is used carefully, cautiously and efficiently. Canadian farms have a track record of continuous improvements in sustainability, and that will continue. Best management practices like 4R Nutrient Stewardship have existed for over a decade and have established practical considerations for fertilizer use that achieve verifiable emission reductions.

We appreciate that the discussion document highlighted farmers’ stewardship, and the vital role they play for our economy. We also appreciate the inclusion of farmers’ concerns surrounding the proposed reduction in fertilizer use. However, we are concerned that to achieve a 30 per cent reduction in absolute emissions from fertilizer use within the very aggressive eight year timeline, especially when no baseline or research is yet established, will lead to rushed and, possibly, poor decisions. For example, if the government inevitably seeks to limit fertilizer usage, should progress not be made at the pace required. **We cannot stress our opposition to such a policy enough.**

We recognize that you cannot hit what you do not aim at, but such a target must be practical and achievable, without adverse economic and social impacts.

Economic realities and on-farm necessities dictate what is feasible and focusing solely on absolute reductions are not. Instead, we recommend targeting reductions in intensity relative to production to reflect the needs of the entire value chain. This would mean that as production per acre increases we would get credit for reducing fertilizer intensity. For example, if oat yields would go from an average of 100 to 110 bushels per acre, then we are using less fertilizer per bushel. This would increase Canada’s fertilizer efficiency rate while still meeting worldwide food security needs in such turbulent times.

We understand the need to hasten the adoption of technologies and practices that could reduce emissions. Developing federal policy and programs that can achieve widespread success will not be easy. Agriculture and Agri-Food Canada (AAFC) must work closely with farmers throughout policy development. There is no one-size-fits-all approach to meeting this target, and many individual farm-level variables will impact what solutions work for each farmer. Below are a few suggestions for ways the Federal Government can help move the fertilizer emissions reduction goal forward faster:

- Enhanced Efficiency Fertilizers (EEFs) are identified in the discussion document as one technology that may help to improve the efficiency of nitrogen fertilizer application. However, further research and knowledge transfer is needed so farmers can make informed decisions supported by science whether a product might be a good fit for their operation. The majority of research on the use of EEFs has been conducted in areas outside of western Canada and involves cropping systems that are significantly different than those in Saskatchewan. Research completed at the University of Saskatchewan has shown the environmental benefits of using EEFs with reduced nitrous oxide emissions; however, no significant agronomic (i.e., yield) benefits were detected. Further research is ongoing to determine how best to optimize the agronomic benefits of using an EEF in prairie cropping systems.
- As the cost of new products, equipment, and technology is often one of the largest barriers to adoption, cost-sharing programs should continue to be explored. We recognize that the government is developing funding programs; however, the practices/technologies available for funding need to be flexible and suitable for various and diverse regions across Canada. Ultimately, the government needs to ensure that incentivized practices have been broadly tested at the farm level to ensure they are practical and beneficial for farmers in the region they are being promoted in.
- Research is not only needed on the environmental impact of possible emission reducing technologies, but also on the economic and agronomic impacts. Farmers need accessible, unbiased research to assist them to trial and evaluate practices and technologies to understand what will work for their farm.
- Current modelling of emissions and the impact of management practices at the farm level is a large concern for farmers. It is crucial to be able to accurately measure the impact of on-farm practices on emissions reduction to not only understand current emission levels, but also to correctly measure progress towards the target. Many farmers are already implementing 4R and other BMPs, and those need to be accurately measured and accounted for. Without improved data collection and accurate modelling to measure emission levels, we risk developing policies that will negatively impact our ability to feed the world.
- Improving data collection and modelling should not create additional reporting burdens for individual farmers. Surveying a representative sample of Canadian farmers, reflective of diverse regional production conditions and levels, on fertilizer management practices should not create any more of a burden for respondents than current government or industry survey collection does. Compensation for participation in the survey should also be implemented.
- Research and variety development are the primary way to increase agricultural sustainability and resiliency. As climate change and environmental protection are main priorities of the Sustainable Canadian Agricultural Partnership, breeding activities that develop trait technology and innovation 'ingrained' in the seed will help the government

meet their sustainability goals by providing farmers with higher yielding varieties with improved nutrient use efficiency, reduced herbicides needed, and better ability to withstand abiotic and biotic stressors. Therefore, it is vital that the Government of Canada fund breeding activities through the Agri-Science Cluster Program and **at the same level as other sustainability work.**

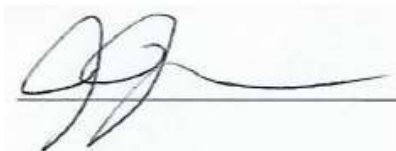
- Continued research into new technologies and production practices for use on-farm is also crucial to ensuring the sustainability and resiliency of Canadian field crop production. Agronomic research can identify BMPs that result in reduced GHG emissions, more effective input use and more efficient carbon capture, furthering farmers' contribution to Canada's climate change and sustainability goals. However, there are many variables at the regional and individual farm level that will impact what solutions work for which farmer. It is critical that any recommended or incentivized practices are both economical and environmentally feasible for farmers. Wide scale testing at the regional and farm level is needed to assist in the adoption process.

Government must not develop policies that impact Canadian farmers without consultation. The discussion paper references the ongoing development of a *Green Agricultural Plan (The Plan)*. While we have heard reference to the development of *The Plan*, we have yet to see consultations on what it might entail and fear that we will be left out of the decision-making process just as the Ag sector was left out of the process to determine what an appropriate fertilizer emissions reduction target was achievable. We encourage the Government of Canada to do a much more thorough job of working with stakeholders in advance of policy decisions being made. It's simply not realistic to set goals before knowing where you currently are, how to measure progress and hearing from subject matter experts, in this case farmers, on real life realities.

We urge AAFC to work with the sector to develop policies that reflect our shared goals. The oat growers are committed to being a sustainability leader and finding solutions that align Canada's goal with the unique needs and opportunities of the sector. We have a very concrete desire for stronger relationships with our government partners and look forward to engaging in the early phases of policy development across all issues impacting producers.

I trust AAFC will consider our comments and continue engaging with stakeholders throughout the weeks and months ahead.

Sincerely,

A handwritten signature in black ink, appearing to read 'JJ', written over a horizontal line.

Jenneth Johanson, President
The Prairie Oat Growers Association