

February 6, 2024

Standing Senate Committee on Agriculture and Forestry (AGFO)  
The Senate of Canada  
Ottawa, Ontario  
K1A 0A4

Via Email: [agfo@sen.parl.gc.ca](mailto:agfo@sen.parl.gc.ca)

**Re: Study on Soil Health in Canada**

Dear AGFO Committee Members,

Canadian Canola Growers Association would like to thank members of the Standing Senate Committee on Agriculture and Forestry for the opportunity to appear as a witness and share the following recommendations for supporting canola farmers in enhancing soil health for your consideration:

- 1) **Support sustainable intensification to achieve desired environmental outcomes, recognizing solutions are not one-size-fits-all.** The basic goal of sustainable intensification is to increase food production from existing farmland while minimizing pressure on the environment<sup>1</sup>. Agricultural production systems are diverse and tailored to their local social-ecological contexts. This means that actions to support soil health may look different from one farm to the next. Producers consider the holistic impact of their farming practices on their operation, making decisions that optimize their efficiency and create multiple, lasting sustainability gains. For example, the practice of soil testing allows a farmer to understand their nutrient management needs, appropriately applying products like fertilizer at the right time, place, source and rate. While this benefits soil health directly, it also has indirect benefits for water quality and biodiversity. Government should recognize how all the areas of agricultural sustainability are interconnected so that they can harness co-benefits of BMPs and ensure messaging to farmers on desired actions and outcomes are clear. It is critical that efforts to enhance soil health do not prescribe or prioritize one method of production over another, as farmers need access to various practices, tools and technologies to make the most impact on their own farm while maintaining a livelihood.

The government can significantly support canola growers by ensuring the regulatory environment is well-positioned to champion advanced plant breeding technologies such as gene editing. New variety development can support farmers by providing access to varieties that are adapted to new environmental conditions (due to climate change) that pose significant challenges for canola farmers, such as drought. Moreover, enhancing funding and allocating additional resources to the Pest Management Regulatory Agency (PMRA) will not only safeguard the core functions of the agency but

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<sup>1</sup> <https://www.ipbes.net/glossary-tag/sustainable-intensification>

also fortify its capacity to make science-based decisions in a timely manner for crop protection products used on farm.

- 2) **Increase funding and resources for existing programs for agricultural climate solutions and explore alternative models for payment for ecosystem services (PES) to enhance programs.** Farmers must be recognized for their work in protecting soil health as a public good for Canadian society. It is crucial for the government to acknowledge the ongoing costs tied to the technologies and practices they encourage farmers to adopt. To achieve long-term success in realizing desired environmental outcomes, it is essential to provide continued support beyond the initial year of adoption. The government should work closely with farm groups and farmers to ensure that policies, programs, and funding are developed in a coordinated manner, maximizing the efficient use of limited resources. In addition to increased funding, programs should be expanded to avoid design that narrowly dictates the kinds of actions that are eligible for payment. To illustrate, the On-Farm Climate Action Fund (OFCAF) is currently limited to rotational grazing, nutrient management, and cover cropping projects, practices that are well-fitted to some farms in particular regions/conditions, and less feasible for others. A powerful leverage point for increasing sustainability is to enable self-organized solutions, and in this case, allowing flexibility and application of local knowledge increases program appeal to canola farmers and supports them towards achieving sustainable outcomes.

To enable transformative change within the sector, multiple incentive streams will be needed. One avenue government should prioritize is the reintroduction of the Climate Action Incentive Fund (CAIF), which would support farmers in implementing projects that reduce on-farm emissions. Unfortunately, CAIF has not been open for applications since the summer of 2019, creating a gap in resources farmers can access. Efforts should be made to ensure that both existing and new programs do not exclude those who are already engaging in conservation activities (to avoid creating perverse incentives). The application process for accessing program funding sources such as CAIF and OFCAF should be simplified, avoiding unnecessary complexity and burdensome procedures that might pose challenges for the average farmer to navigate without third party support. Finally, existing programs should be regularly evaluated to disseminate learning to other program administrators and improve program elements, as well as increasing transparency to the sector by sharing results.

- 3) **Environment and Climate Change Canada (ECCC) should accelerate the development of the 'Enhanced Soil Organic Carbon' protocol for Canada's Greenhouse Gas Offset System.** Farmers are business owners and listen to economic signals. Government should support efforts that help signal the need to preserve these ecosystem goods and services on-farm. The goal of this protocol is to incentivize the adoption of sustainable agricultural land management activities, which reduce emissions and enhance soil carbon sequestration. This will support access for producers to voluntary carbon markets where they can find additional economic value in practices on-farm that support healthy soils. This would contribute positively to producers' return on investment when considering adoption of new practices and technologies that benefit soil health. It should also recognize the good work many farmers have done to date in sequestering carbon through practices such as low or zero till agriculture.

- 4) **Appoint additional farmer /farm group representatives to Canada's Net-Zero Advisory Body.** The body acts as an independent group of experts meant to advise on pathways to achieve net-zero emissions by 2050. The agricultural sector holds a unique and crucial role in the reduction of emissions. Farmers, on the frontline of climate change, have a commendable track record of embracing practices and technologies that mitigate emissions and contribute to positive co-benefits such as healthy soils. Coupled with the sector's significant contribution to Canada's economy, CCGA advocates for increased representation of the agricultural sector on the Advisory Body group. This strategic move aims to yield practical and impactful results that not only align with environmental goals but also support and enhance overall competitiveness of Canadian agriculture.
- 5) **Ensure swift passage of Bill C-234 to alleviate financial burden and support canola farmers capacity to invest in sustainability on-farm.** The bill seeks to amend the *Greenhouse Gas Pollution Pricing Act* to extend the exemption for qualifying farming fuel to marketable natural gas and propane. The passing of this bill would allow farmers to keep more working capital to invest in the sustainability of their operations, including enhancing soil health. For example, costs saved through Bill C-234 could be invested into precision agriculture technology, supporting soil health by using data that allows a farmer to optimize water, crop inputs, and energy use, improving soil quality and preventing nutrient run-off. This technology can help mitigate the impact of climate change on the sector, particularly in coping with challenges like droughts, extreme weather events, and climate-related pests and diseases. However, the adoption of precision agriculture equipment comes with an expensive price tag and necessitates skilled labor for operation, leading to an overall increase in the operational costs for a farm. Therefore, to support farmers in adopting the technologies and practices that will allow them to enhance soil health and sustainably intensify their operations necessary to contribute to Canada's climate goals, it is critical to pass Bill C-234 when it returns to the Senate.

In conclusion, canola farmers are essential partners in preserving and enhancing soil health in Canada. To accelerate the adoption of new practices and technologies, they need recognition and support. Canola farmers care about the health of their soils and understand the important role it plays in producing the high-quality canola crop they are known for.

Sincerely,



Roger Chevrax  
Board Chair  
Canadian Canola Growers Association



Dave Carey  
Vice-President, Government & Industry Relations  
Canadian Canola Growers Association