



Ducks Unlimited Canada
Conserving Canada's Wetlands

Thursday, August 5th, 2021

Mr. Pat Finnigan MP
Chair, Standing Committee on Agriculture and Agri-Food
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
AGRI@parl.gc.ca

Dear Mr. Finnigan,

On behalf of Ducks Unlimited Canada (DUC) and our conservation community of 111,025 supporters, I would like to thank the Standing Committee on Agriculture and Agri-Food for the opportunity to contribute to this important discussion on the agricultural sector's environmental contribution. As you are aware, DUC has been working to improve the ecological health of Canada's agricultural working landscapes since our founding in 1938.

For more than 80 years, we have partnered with farmers and ranchers across Canada to implement our conservation programming. From the very start, we recognized the important role Canada's agricultural producers play in stewarding our soil, air, water, carbon, and many other important economic, social, and environmental assets that our lands and waters provide. For example, lands managed by beef farms and ranches are estimated to support 68% of the total wildlife habitat capacity within agricultural landscapes. We have repeatedly stated that without meaningful collaboration and co-operation with the agriculture sector, we cannot fulfill our conservation mission. In this same vein, we would respectfully submit that Canada cannot meet its environmental goals without a strong commitment to tackling the most pressing environmental challenges of our time, primarily climate change, habitat, and biodiversity loss, without the full embrace and engagement of the agricultural sector.

Within the four objectives identified in your invitation, DUC respectfully offers the following thoughts and recommendations:

- *Reducing agriculture's greenhouse gas emissions and carbon footprint:*

An important step in reducing emissions and carbon footprint is recognizing historic and ongoing contributions by the agricultural sector. Practices in this category include adopting zero tillage, rangeland stewardship of native grasslands and establishing perennial forages on marginal land.

Among the many examples of Canada's leadership in this area is the fact that both Canada's beef and dairy sector have one of the lowest GHG emissions per unit of production in the world. In fact, our emissions per unit of output are approximately half of the global average.

In contrast, we continue to see ongoing, and in some jurisdictions, accelerating conversion of wetlands, grasslands, and other natural areas to crop production.

This habitat conversion trend is both concerning and not sustainable. Many discerning markets around the world are attempting to avoid or eliminate the purchase of agricultural products whose

production systems still permit conversion of natural areas to cropland or forested areas to tame forage. This market signal recognizes the significant GHG implication of land conversion. DUC recognizes that there is shared jurisdiction regarding the protection of wetlands, grasslands, and natural areas within Canada. We also recognize that, without stronger policy leadership, Canada will continue down the path of land conversion, significantly contributing to negative environmental impacts including increased GHG emissions, biodiversity declines, and degraded water quality. The Census of Agriculture reported that 1.6 million hectares of grasslands alone were converted to cropland between 2006 and 2016. It is estimated that this conversion resulted in the release of 11.86 million metric tonnes of CO₂ equivalent. These are trends that federal and provincial governments must take steps to address.

DUC believes there are several opportunities to not only decrease agriculture's GHG emissions and lower its carbon footprint, but to increase the role the sector plays in helping to meet Canada's overall GHG reduction targets. In addition to slowing, and eventually halting, the unmitigated conversion of wetlands, grasslands and other natural areas, DUC believes there is a tremendous opportunity to retire or repurpose marginal land currently under crop production today.

In 2020, Agriculture and Agri-Food Canada identified three to five million hectares of "economically" and "environmentally unsustainable" cultivated land plus four to six million hectares of "economically unsustainable" cultivated land in Prairie Canada. These two categories represent 28% of the cultivated land base in that region. Removing most of these areas from annual crop production and converting them to perennial forages or wetlands as appropriate would achieve many goals. From an environmental perspective, marginal areas could become hotspots for biodiversity, water filtration and purification, and carbon sequestration. DUC believes this could be highlighted as a "made in Canada" example of sustainable intensification. The economic and environmental values associated with this sustainable intensification could be advanced further through increased adoption of reduced tillage, improved grazing practices and industry Best Management Practices (BMPs) such as 4R nutrient stewardship, forages in rotation and Integrated Pest Management (IPM).

- Promoting soil health:

Soil is one of, if not the, most important asset the agriculture sector stewards. Canada has historically played a leadership role in soil conservation. In the 1980's, under former Senator Herbert Sparrow's leadership, the important Soils at Risk report was issued. This initiative ultimately led to the formation of the Soil Conservation Council of Canada, the country's leading soil health and conservation organization. Strategic investments made by government, such as those in the late 90's and early 2000's under initiatives such as the Greenhouse Gas Mitigation Program, brought together groups like the Soil Conservation Council of Canada and the Canadian Cattlemen's Association to advance BMPs across the country. Groups like these should be engaged as they are tremendous assets for governments in promoting soil health. DUC recommends that a priority first step is to develop a comprehensive soil strategy for Canada. In this vein, we applaud Senator Douglas Black for his leadership in initiating this effort.

DUC believes there is a need for expanded research on emerging trends, partially driven by market demands, such as cover crops and their applicability and adaptation at the scale of modern Canadian farming operations. Similarly, new technologies such as vertical tillage, need to be better understood. We, and our partners, have seen both positive and negative soil impacts from these applications. DUC also believes that there is important work needed to help both crop and livestock

sectors to work more closely together. This collaboration could result in a more circular relationship where residues, manure and waste products could be exchanged between sectors. This is an important step in implementing the Regenerative Agriculture principle of “integrating livestock” at a larger scale and in a way that is appropriate with modern production systems in Canada.

- Reducing agriculture’s dependency on fossil fuels:

DUC believes that a “made in Canada” sustainable intensification model, as described earlier in this document, could significantly contribute toward decreasing fossil fuel consumption by the sector. More fulsome adoption and implementation of forages in rotation, adoption of grazing practices that sequester more carbon, 4R Nutrient Management, conservation tillage and IPM are examples of BMPs that should be considered.

Replacing a portion of our fossil fuels with biofuels is also a positive step and should be employed as a transition strategy towards helping the agricultural sector move to a net-zero carbon emissions goal by 2050. DUC supports the development of a biofuel industry in Canada, particularly if it leads to greater adoption of climate smart production systems. DUC’s concern with the current model is that it does not adequately ensure that production of feedstock does not drive the continued conversion of wetlands, grasslands, or other natural areas to annual crop production. If the unsustainable rate of land conversion in Canada is maintained, or increased, due to the demand of crops for feedstock, we believe that the resulting increase in GHG would more than offset the benefits of developing a biofuel industry in Canada.

- Encouraging farmers to adopt environmentally friendly farming practices:

DUC believes a major gap in the adoption of new farming practices that have high environmental and/or social benefits is technology transfer. Over a decade ago, federal and provincial governments dramatically reduced their investment in technology transfer, as have Canada’s universities. We believe that the agriculture sector has done a tremendous job in partially filling the gap on those issues relating to productivity and economically sound production systems. In our discussions with partners in the cropping sector, many of us have wondered, if the next “zero tillage” opportunity presented itself today, who would provide the technology transfer? DUC recommends that federal and provincial governments reinvest in tech transfer specifically targeted at production systems that provide higher social and/or environmental values as a supplement to industry efforts. This reinvestment could take the form of public, private or a partnership to execute on delivery. We believe there are several strong examples such as Cows & Fish and Saskatchewan Soil Conservation Association that could be used as models for a reinvigoration of tech transfer in Canada.

The CAP and accompanying BMP programming administered by AAFC have provided an important instrument for driving adoption of practice change. Increased emphasis on those programs and BMPS that deliver high environmental and/or social benefits is an opportunity to further their adoption. DUC suggests that these programs need to be examined and adapted to ensure they are relevant for all farms and ranches in Canada. It is our understanding that larger farms and ranches under participate in these federal/provincial programs, primarily because the program parameters make them ineligible or financially irrelevant. Based on the 2016 Census of Canadian Agriculture, 7.6% of farms account for over 60% of the gross receipts. Reaching these farms is critical for Canada to achieve its environmental and social goals on the agricultural landscape.

Canadian farmers and ranchers have demonstrated a tremendous ability to deliver their goods to market in response to market signals and demand. DUC believes that Canada is long overdue in

having a meaningful Ecological Goods and Services (EGS) program that provides incentives for the production and protection of those environmental values so desired by Canadians. It is our understanding that we are the only G7 country without an EGS program. We recognize that funding such a program involves a considerable public investment as DUC has been delivering these types of programs as part of our on-farm conservation efforts since our inception in 1938. Hopefully, the development of a regulated carbon market in Canada where farmers and ranchers can capitalize on the carbon they steward and sequester will provide a platform for a more fulsome EGS program.

DUC believes that the message from the agriculture sector on Business Risk Management (BRM) has been very clear, the levels of support offered simply do not provide Canadian farmers and ranchers with an adequate financial safety net. This is particularly obvious when compared to the levels of support offered by our competitors around the globe. DUC would support a fulsome discussion involving all stakeholders to explore a more meaningful level of financial safety provided by Canada's BRM programming provided that the discussion also included the adoption of accompanying environmental and ecological service safeguards like those that we commonly see within other countries' producer financial support programs. We believe that there are opportunities for win-win outcomes, especially if initiated from the agriculture sector itself.

Thank you for the opportunity to provide our thoughts and recommendations. We look forward to discussing these, and other agri-environmental, opportunities.

For further info, please feel free to contact me for any additional information.

Regards,

A handwritten signature in black ink, appearing to read 'James W. Brennan', with a stylized flourish at the end.

James W. Brennan
Director, Government Affairs
j_brennan@ducks.ca