

## Canadian Canola Growers Association

Submission to the Standing Committee on Environment and Sustainable  
Development for its Study on Freshwater

April 16, 2021

Dear Members of the Standing Committee on Environment and Sustainable Development,

Canadian Canola Growers Association (CCGA) appreciates the opportunity to provide comments for the committee's study on freshwater. CCGA represents Canada's 43,000 canola farmers across Canada on national and international issues, policies, and programs that impact farm success. CCGA is also the largest administrator of Agriculture and Agri-Food Canada's Advance Payments Program (APP).

Developed in the 1970s by researchers at the University of Manitoba and Agriculture and Agri-Food Canada (AAFC), canola is a staple of Canadian agriculture as well as Canadian science and innovation. Today canola has become Canada's most widely seeded crop, planted on over a fifth of all Canadian cropland. In Canada, canola generates the largest farm cash receipts of any agricultural commodity, earning Canadian farmers over \$10.2 billion in 2020. Each year over 90% of canola production is exported worldwide as seed, oil, or meal, with exports valued at \$11.9 billion in 2020. The canola industry contributes 207,000 jobs and \$29.9 billion to Canada's economy every year.

Canola farmers are committed to a sustainable future and have established goals to support that commitment. By 2025, they are targeting to reduce their fuel usage by 18% per bushel, increase land use efficiency by 40%, sequester an additional 5 million tonnes of CO<sub>2</sub>e, use 4R nutrient stewardship practices on 90% of canola production acres, and continue to safeguard the more than 2,000 beneficial insects that call canola fields and surrounding habitat home.

Our comments in relation to the committee's freshwater study will focus on the creation of a Canada Water Agency.

#### *Departmental and stakeholder engagement*

In terms of total acres, private landowners engaged in agricultural production in Western Canada are the largest constituent group related to the proposed Canada Water Agency (CWA). Agricultural groups and the farmers they represent, including CCGA, must be engaged substantively throughout this policy development process if it is to succeed.

With agricultural producers collectively being the largest private landowners, Agriculture and Agri-food Canada (AAFC) should be a lead department in developing and implementing policies and programs that impact agricultural land. This should include programs that are currently Environment and Climate Change Canada's (ECCC) lead but that will have a direct impact on agricultural land. While leading, AAFC should work closely with national agricultural associations that can provide input on behalf of the sector that will be important to long term success of this initiative.

#### *Legislative and Regulatory Considerations*

Presently, water is a shared jurisdiction between municipalities, provinces and the federal government. In designing a CWA, it is essential that the current interplay of legislation and regulations be maintained. Duplication or further imposition of legislation and regulations related to water, as has been the case with the revised

*Fisheries Act*, must be avoided.

Farmers often work closely with provincial governments and municipalities in the areas of water management, irrigation and water monitoring. The CWA should support these efforts in a collaborative manner that maintains existing competencies.

We would recommend that the agency work closely with provinces and municipalities, as well as landowners, to develop and implement any projects or programming. As the primary users of water in Canada, it is crucial that agricultural stakeholders are the priority group for engagement.

#### *Water Quality*

Our organization has experience conducting research over several consecutive years to monitor pesticides in water. While this research has consistently shown no pesticide detections above any level of regulatory concern, it needs to be supported and resourced for the long term. However, it is not reasonable for private stakeholders to continue to undertake this work given the importance of it to the public at large.

The CWA should fund and support efforts that are currently ongoing at the provincial level, and provide funding for a national water monitoring program, overseen by the Pest Management Regulatory Agency (PMRA).

A national water monitoring program for pesticides will further enable science-based decision making and enable PMRA to avoid unnecessarily conservative regulatory re-evaluation decisions that threaten the competitiveness and success of our farms. It is critical that national water monitoring for pesticides has oversight from PMRA, as the data produced have direct bearing on the quality of the PMRA's re-evaluation decisions. A significant investment is needed now to ensure the PMRA has the water monitoring data it needs to fulfill its mandate, ensuring that products registered for use in Canada are safe for human health, and the environment. While a national water monitoring program for pesticides will positively address concerns identified by the agriculture industry, we would like to continue to be engaged as these changes are implemented. The PMRA and the agriculture industry have years of first-hand experience in designing and implementing meaningful water monitoring programs that are fit for regulatory purpose. Early and substantive engagement in the design of any such programme will ensure resources are properly allocated and in the most efficient way possible. We look forward to being consulted on operating details directly to enable meaningful evaluation of impacts.

#### *Water Quantity*

Farmers are experts at water management. Years of flood and drought are common across the prairie landscape. Without the correct amount of moisture, crops and farmers' livelihoods are threatened. Natural infrastructures like wetlands are a tool for water management, improved water quality, and carbon sequestration. Farmers manage their natural infrastructures with a variety of outcomes in mind including water storage, flood and drought mitigation, and wildlife habitat.

Using wetlands as effective water management tools has numerous ecological and societal co-benefits. Given these co-benefits, the best approach to utilizing and recognizing the value of these sorts of natural infrastructure

on private land is through government facilitated financial incentives. Such an approach would provide meaningful co-benefits for stakeholders, while recognizing landowners' contributions to maintaining habitat and sequestering carbon.

*Lessons from the Prairie Farm Rehabilitation Administration (PFRA)*

The PFRA was instrumental in a number of projects that improved the management of water across the Prairies. Its success stemmed from the fact that it worked closely and collaboratively with farmers and landowners, through a decentralized structure with a significant local presence. The former PFRA was a pragmatic agency that housed significant technical expertise. It understood that local stakeholder knowledge was key to addressing many of the agricultural and economic challenges facing the Prairie region. The PFRA took on major projects that benefited farmers, landowners and many Prairie communities, writ large. While it will be difficult to re-establish the wealth of expertise gathered and relationships that were lost when the PFRA was dissolved, we would urge government to replicate a similar approach to stakeholder engagement as you look to build the CWA.

Thank you for consideration of this brief. Canola growers are committed to the highest standards of water quality and understand the importance of water availability. We strongly believe that the CWA must not pursue new legislative or regulatory aims, support existing provincial and new national water monitoring work, incentivize natural water management infrastructure, and build on proven approaches to stakeholder engagement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Carey', with a stylized, flowing script.

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