



June 3, 2022

Agriculture and Agri-Food Canada  
1341 Baseline Road  
Ottawa, ON, K1A 0C5  
Via email: [aafc.fertilizer-engraise.aac@agr.gc.ca](mailto:aafc.fertilizer-engraise.aac@agr.gc.ca)

## **Re: Reducing Emissions Arising from the Application of Fertilizer in Canada's Agriculture Sector**

Dear Agriculture and Agri-Food Canada,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

It is vital that agricultural production is not compromised by efforts to reduce agriculture-related emissions. The CFFO supports the current approach which does not set a specific fertilizer use reduction target, which might put production at risk. Farmers need to have the flexibility to find solutions to increase fertilizer efficiency that are appropriate for their particular farm operation.

The CFFO recognizes the importance of efficient use of resources, including fertilizers, as part of good farm stewardship. There is room for improvement in the efficiency of current fertilizer use. With the cost of synthetic fertilizer currently high, farmers will see greater return on investment for efforts to improve efficiency. We see significant potential for achieving this via expanded acres participating in 4R Nutrient Stewardship, expanded adoption of existing beneficial practices, expanded use of improved forms of synthetic fertilizer and expanded use of organic sources of nutrients.

The CFFO supports the following as methods to improve efficiency and reduce emissions from application of fertilizer:

- Encourage and support expanded adoption of 4R Nutrient Stewardship in terms of both increased acres and number of farms.
- Encourage and support expanded adoption of existing practices such as soil testing, split application, precision farming, avoiding fall application, conservation tillage and improved drainage design.

- Encourage and support expanded use of improved nitrogen fertilizer including enhanced efficiency, inhibitor-containing or slow-release forms.
- Promote the use of manure, digestate and compost as sources of nutrients, including efforts to make these easier to access and apply.

In measuring success, the CFFO recommends first focusing on measuring uptake of these practices. It is important to avoid duplication of effort or introducing burden on individual farms. The CFFO recommends looking to existing forms of data as an important starting point to understand our current baseline and to measure success in expanding uptake.

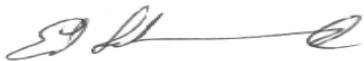
### **Conclusion**

In looking for efficiencies to reduce emissions, it is important that productivity is not compromised. The CFFO supports the current approach to promote greater efficiency without setting a specific target for reduction in overall fertilizer use. With the diversity of farms and farming conditions across Canada, it is important that farmers have the flexibility to find solutions to increase fertilizer efficiency appropriate to their farming situation.

By expanding acres participating in 4R Nutrient Stewardship, expanding adoption of existing beneficial practices, expanding use of improved forms of synthetic fertilizer and expanding use of organic sources of nutrients, there is significant potential to achieve the government's desired target.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario

