



# CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

March 31, 2023

Attention: Sustainable Agriculture Strategy  
Agriculture and Agrifood Canada  
1341 Baseline Road, Tower 7  
Floor 5, Room 300  
Ottawa, ON  
K1A 0C5  
Delivered via email: [aaafc.sas-sad.aac@agr.gc.ca](mailto:aaafc.sas-sad.aac@agr.gc.ca)

## Re: Sustainable Agriculture Strategy

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.

The proposed Sustainable Agriculture Strategy should build on the successes and good work farmers and so many others in the agri-food system are already doing to provide high quality agricultural products, produced in a sustainable way, to meet the needs and expectations of Canadians and others around the globe.

The CFFO recommends:

- Initiatives through the Sustainable Agriculture Strategy need to consider direct impacts to farmers' incomes.
- Collaboration with existing and ongoing provincial/territorial and industry initiatives, including "Ontario's Agricultural Soil Health and Conservation Strategy" and 4R Nutrient Stewardship.
- A baseline of current practices needs to be established.
- Agricultural sustainability needs to focus on areas that maintain or improve production *as well as* bring environmental benefits.
- Support for research focused on soil health, water quality, wise use of resources, and farm sustainability.
- Research on better measurement of key factors such as soil health and farm-related GHG emissions should be prioritized.
- Government and industry need to work together to find better ways to measure outcomes, including beneficial management practice (BMP) uptake.

---

**REPRESENTING FARMERS SINCE 1954**

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T J5  
1-855-800-0306 or 519-837-1620      info@christianfarmers.org      www.christianfarmers.org

## Guiding Principles

**Farmer-focused** – The importance of maintaining or enhancing farmer incomes must be kept front and centre. Farmers cannot be good stewards of their land if they are driven out of business or do not have sustainable incomes to allow them to properly care for their land. **Initiatives through the Sustainable Agriculture Strategy need to consider direct impacts to farmers’ income and ways that farmers’ incomes can be diversified through the initiative.**

**Coordination** – It is important to coordinate and collaborate with existing and ongoing provincial/territorial and industry initiatives, including “Ontario’s Agricultural Soil Health and Conservation Strategy,” and 4R Nutrient Stewardship.

The CFFO has been active in the ongoing work to implement “Ontario’s Agricultural Soil Health and Conservation Strategy.” Environmental initiatives under the Sustainable Agriculture Strategy focused on soil health should support the implementation of the goals outlined in this soil strategy.

The CFFO has also been actively involved in the industry-led 4R Nutrient Stewardship initiative. This program ensures professional advice to farmers on the most efficient use of nutrients for their specific conditions.

**Additionality** – In order to ensure actions are “above and beyond those that are already taking place,” **a clear baseline of relevant current practices needs to be established.**

While it is important to press forward and continue to make improvements, **it is also important to acknowledge innovators** who have made significant changes and improvements on their own initiative and often at significant personal costs of capital and effort. These innovators should not be penalized for striking out ahead of the pack while the laggards are rewarded with incentives and lower costs.

## Proposed Vision and Goals

**Agricultural sustainability needs to focus on areas that maintain or improve production as well as bring environmental benefits.** These include protection of productive farmland, improved soil health, and diverse crop rotation. At the same time, it is important that environmental goals do not compromise production or come at the cost of farmer incomes. Reduced production may put our overall food security, in Canada and globally, at greater risk. Farmer incomes are the foundation of a thriving agri-food system and economy in Canada. Society as a whole should share the cost of achieving desired ecological goals.

Healthy soil is the foundation of long-term farm success, food production, and environmental benefits. Practices that benefit soil health and water quality also bring

---

REPRESENTING FARMERS SINCE 1954

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T J5  
1-855-800-0306 or 519-837-1620      info@christianfarmers.org      www.christianfarmers.org

other environmental benefits, including storing carbon and increasing overall farm resiliency.

**The CFFO recommends support for research focused on soil health, water quality, wise use of resources, and farm sustainability.** Progress made towards these goals should be carried forward.

## **Approaches to Overcome Barriers and Advance Environmental Outcomes in the Sector**

It is vital that regulations and economic instruments do not come before suitable alternatives exist, have been tested and proven effective, and are commercially available to reasonably allow adoption. For example, the federal carbon tax applies to commercial grain drying in Ontario, where no alternative method is currently available to avoid this extra cost. This is a clear example where an economic instrument has been poorly applied.

The CFFO urges the federal government to remove this tax from all Canadians. In particular, the CFFO continues to ask that fuels used for drying grains, both on-farm and at commercial grain dryers, be exempt from federal carbon pricing.

Instead, it is important to prioritize research, especially focused on better measurement of key factors such as soil health and GHG emissions. Commercialization of viable solutions needs to be accelerated. These need to come before regulation or economic instruments designed to encourage faster adoption.

The CFFO recommends focus on knowledge transfer and extension, supporting advancements in clean technology, and science and research. These need to be the forerunners to clearly demonstrate what is possible, the risks, costs and benefits, better measurement and monitoring, and have commercially viable solutions available. Then farmers can make better business decisions about what will benefit their farming operations and be suitable for their farm soils and landscapes.

Voluntary stewardship is the most effective way to allow farmers agency and flexibility in finding the best solution for their own farm situation. Regulation should be a last resort for those who are lagging behind in adopting broadly accepted practices.

## **Targets and Data on Environmental Performance**

**Government and industry need to work together to find better ways to measure outcomes, including beneficial management practice (BMP) uptake.** From a clear baseline, it will be possible to understand and measure changes in uptake going forward.

Because the results of BMPs vary based on factors such as soil type and seasonal weather conditions, focus should be on measuring uptake of BMPs. Farmers should

---

### **REPRESENTING FARMERS SINCE 1954**

---

receive fair credit for their efforts in implementing BMPs, even if the direct outcome of these practices varies by region and growing season.

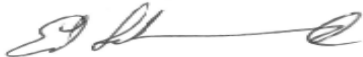
## **Conclusion**

Environmental goals cannot supersede the importance of production or farm financial viability. We do not want to put food security at risk in pursuit of a better environment. The CFFO recommends that sustainability needs to focus on improving production as *well as* environmental benefits together, including through protection of productive farmland, improved soil health, and diverse crop rotation. Government and industry need to work together to find better ways to measure outcomes, including beneficial management practice (BMP) uptake.

We encourage government to continue to support research focused on soil health, water quality, wise use of resources, and farm sustainability. In particular, research on better measurement of key factors such as soil health and farm-related GHG emissions should be prioritized.

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

---

**REPRESENTING FARMERS SINCE 1954**

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T J5  
1-855-800-0306 or 519-837-1620      info@christianfarmers.org      www.christianfarmers.org