



LONG-TERM THINKING FOR TODAY'S ISSUES

August 31, 2022

Agriculture and Agri-Food Canada
1341 Baseline Road
Ottawa, ON, K1A 0C5
Via email: aafc.fertilizer-engrais.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.¹

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. Directly restricting fertilizer-use may put production at risk.

Farmers need to have the flexibility to find solutions to increase fertilizer efficiency and reduce emissions that are appropriate for their particular farm operation. It is vital that the emissions reduction target remains voluntary. Farmers, input suppliers and scientists, among others, need to be appropriately supported in ongoing efforts to innovate and achieve this target.

As we outlined in our previous letter, the CFFO recognizes the importance of efficient use of resources, including fertilizers, as part of good farm stewardship. The CFFO outlined our support for various methods to improve efficiency and reduce emissions from fertilizer.

Measuring the Impact of BMPs on Emissions

Farmers already work hard to improve efficiency and steward the resources they use in farming. However, the government's current system to model and estimate emissions from fertilizer use does not account for most on-farm beneficial management practices (BMPs) that may improve efficiency or reduce emissions.

Farmers are very concerned that, with the current method of calculating emissions, the only way to achieve the desired reduction on paper will be to reduce overall fertilizer use, with potentially significant negative ramifications for crop yields and farm business profitability. Farmers are frustrated that current on-farm

¹ Because of the extended deadline on this consultation, the CFFO is adding this as a second part to our original response to the consultation. The original or first part of our response was submitted on June 3, 2022 and is attached along with this submission.

efforts to reduce emissions are going unnoticed in government calculations. Farmers want to know when and how on-farm efforts will be considered in calculations of emissions reductions.

The CFFO recommends:

- Support for scientific research measuring and modeling the impacts of farm-related BMPs on fertilizer-related emissions.
- Using existing data sources to estimate current baseline and future increased uptake of BMPs.
- Clear communication to farmers about which BMPs will be used in calculations towards meeting the emissions-reduction goal and how this will be measured/modeled.
- A clear timeline for including the impact of BMPs in the National Inventory Report (NIR) calculations.

Ongoing Innovation

The emissions-reduction target that has been set for 2030 is an ambitious target. Increased uptake of current optimal technologies and practices will make significant headway to meeting the target. Innovation that improves on what is currently available will also be required as part of the effort to achieve this target.

The CFFO recommends:

- Support for scientific research investigating innovations to increase fertilizer-use efficiency and reduce fertilizer-related emissions.

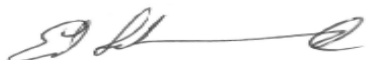
Conclusion

It is important that productivity is not compromised in efforts to reduce emissions from fertilizer use. The CFFO supports the current approach to promote greater efficiency and reduced emissions without setting a specific fertilizer-use reduction target. 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 and that the target remains voluntary.

The CFFO calls on government to support research on the impacts of BMPs on fertilizer-related emissions. It is important to avoid burdening farmers. We recommend using existing data sources to estimate current baseline and future increased uptake of BMPs. Government needs to clearly communicate which BMPs will be used in calculations towards meeting the emissions-reduction goal along with a timeline for when these will be included in NIR calculations. Ongoing innovation through scientific research will also be required to successfully meet the emissions reduction 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