

MANITOBA CROP ALLIANCE

UPDATE ON RESPONSIBLE GRAIN – OUR FEEDBACK TO THE CONSULTATION PROCESS

March 16, 2021

Executive Summary

Manitoba Crop Alliance (MCA) board of directors wishes to share with our farmer members a summary of the feedback we submitted to Responsible Grain for consideration by the Canadian Roundtable for Sustainable Crops Steering Committee and the Code Development Committee. There were three main areas that require additional work, clarification and answers before MCA provides any endorsement of Responsible Grain. Read the full summary of the feedback on the following pages.

1. The Need:

- Improved clarification on the need for a code of practice for grain production.
- What benefits of a code of practice are there for farmers?
- What are our competitors doing?
- Will Responsible Grain lead to more government regulations?
- Will the code of practice remain voluntary and if it does, what is the value in a document that is not required to be followed?

2. The Content:

- MCA strongly recommended edits and revisions are needed to many of the listed requirements and recommendations within the seven modules of Responsible Grain.
- MCA wants improved clarity on the true intent of some of the requirements or recommendations.

3. The Tone and Wording:

- MCA wants the code of practice to positively reflect the good things farmers are already doing around sustainability.
- MCA wants farmers to be the ones to tell their story on the sustainable practices they use in their farming operations to produce safe, high quality food or feed.
- Moving forward, MCA wants to see more farmers involved in the process.
- MCA wants the code of practice to adequately capture the fact that the decisions farmers make are based on the premise of achieving overall sustainability on their farm, and that those decisions will vary by farmer, by field, by region and by year.

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Full Summary

MCA board of directors submitted the following feedback to Responsible Grain for consideration by the Canadian Roundtable for Sustainable Crops Steering Committee and the Code Development Committee. The three main areas that require additional work, clarification and answers are expanded upon below.

1. **The Need.** MCA wants to see the following questions and comments addressed.
 - Improved clarification on the need for a code of practice for grain production. MCA supports the exploration of a document that communicates and demonstrates to our end users and consumers the great work farmers are doing to grow food in a safe and sustainable way. However, it is currently not well explained to farmers on the need for a code of practice. Can there be concrete examples provided to farmers where end buyers are asking for proof or explanation of how farmers are growing food and feed sustainably?
 - What benefits of a code of practice are there for farmers? Is the goal to maintain and/or increase market access? MCA recognized we are largely dependent on export markets for many of the crops our members grow, so increasing and/or maintaining market access is critical. Will there be a price premium where farmers will benefit financially? Or is the premium a retention of market access?
 - What are our competitors doing? As part of the next steps, Responsible Grain should provide information to farmers on other codes of practice or similar programs that our competitors are using to promote their farmers sustainability production practices.
 - Will Responsible Grain lead to more government regulations? In Manitoba, many aspects of grain production are already highly regulated, such as nutrient and water management. However, does a code of practice open the door for increased regulation? There was acknowledgement by MCA increased regulations may occur with or without Responsible Grain. As well, it was noted the day government decides to do something, it is likely too late to do anything.
 - Will the code of practice remain voluntary? If it does, what is the value in a document that is not required to be followed? Delegates wanted further clarification on the voluntary aspect of the code of practice.

2. **The Content.** MCA strongly recommended that edits and revisions are needed to many of the listed requirements and recommendations within the seven modules of Responsible Grain. At a high level, many of the requirements and recommendations throughout the seven modules are already being met by many of MCA's delegates. However, there were concerns about individual requirements and recommendations where revisions are needed.

In addition, there were many concerns voiced with the Water Management module, the Soil Management module, and the Land Use and Wildlife module. The following are some examples discussed.

- Water Management module: There are already regulations and water licensing in Manitoba so there is not a need for specific requirements or recommendations.

- Soil Management module: Concerns were expressed about tillage operations and burning of residue.
- Land Use and Wildlife module: MCA highlighted there needs to be recognition of the different regions within Manitoba and where land development is at. It was also noted that if land is zoned for agricultural use, then land use focused on agriculture should be conveyed within the code of practice.

MCA wants improved clarity on the true intent of some of the requirements or recommendations. It was noted that delegates and farmers could interpret a requirement or recommendation in very different ways. Many of the requirements and recommendations are also redundant and can be consolidated. Comments were also made concerning technology and the code of practice should not limit the tools and technology that can be used.

3. **The Tone and Wording.** MCA wants the code of practice to positively reflect the good things farmers are already doing around sustainability. The current draft does not tell a positive story, but instead is more government and bureaucratic in tone. The use of the terms 'requirement' and 'recommendation' contributed to the overall tone of the current draft. The tone within the current draft is "do this" as opposed to a more positively framed "we do this". Responsible Grain should focus on telling the good news story of the sustainable practices' farmers are utilizing on their farm to inform consumers, end users and buyers, as opposed to having a list of requirements and recommendations that does not capture the give and take nature of every decision a farmer makes to grow food and feed sustainably.

MCA wants farmers to be the ones to tell their story on the sustainable practices they use in their farming operations to produce safe, high quality food or feed. The story of Responsible Grain and a code of practice for grain production needs to be farmer-led with the narrative by farmers and controlled by farmers.

MCA wants to see more farmers involved in the process moving forward. There was general agreement on the purpose and value of having other industry players be part of the process in the development of a code of practice. However, there are strong concerns with the Environmental Non-Government Organizations (ENGOS) that are currently part of the process. There should be consideration given to revamping the current make-up of the Code Development Committee to reflect higher farmer participation. Another option would be to have a pre-consultation (beta-testing) with interested farmers before the launch of the consultation on the second version.

MCA wants the code of practice to adequately capture that the decisions farmers make are based on the premise of achieving overall sustainability on their farm and those decisions will vary by farmer, by field, by region and by year. All decisions farmers make are in the best interests of being economically sustainable while at the same time ensuring the environmental sustainability of their farms for the next generation.

MCA board of directors appreciates the time given by farmer members as MCA worked through the Responsible Grain modules and the consultation. The board of directors have directed staff to provide continuing updates provided by the Canadian Roundtable for Sustainable Crops to ensure farmer members are informed of next steps.