

MANITOBA CROP ALLIANCE

OUR FEEDBACK TO THE 'CODE OF PRACTICE 2.0' CONSULTATION

April 2023

Manitoba Crop Alliance (MCA) board of directors wishes to share with our farmer members feedback we submitted to the Canadian Roundtable for Sustainable Crops (CRSC) steering committee on the revised, draft version of the "Code of Practice 2.0". Our feedback is framed around our submission made in 2021 after the first round of consultations, focusing on the three main areas identified as requiring additional work, clarification and answers. Our 2021 submission can be reviewed [here](#).

- 1. The Need:** Manitoba Crop Alliance appreciates the efforts by the CRSC to develop and release the [2021 White Paper](#), along with associated webinars to share information and provide answers to the why and need of a Code of Practice. Based on the information provided in the White Paper, MCA continues to support the exploration of a document that showcases and tells the positive story of the work by Canadian farmers to ensure environmental and economic sustainability of their farms for the next generation.
- 2. The Content:** MCA acknowledges the efforts by the CRSC in developing a revised, draft version of a Code of Practice that incorporates many of the changes farmers called for from the 2021 consultation (Responsible Grain). Many of the concerns in the previous modules of water management, soil management, and land use and wildlife have either been removed or reworded to provide clarity. Further consolidation of information into four sections from the previous seven modules was also beneficial.

Further Action Needed:

- MCA strongly recommends any data that is used within future draft versions include appropriate verification to ensure statements are science-based and based on peer-reviewed data. Verification should include experts reviewing and verifying statements within the draft code of practice.
 - It is understood the revised draft version requires a significant amount of work to move it from the current version to a final draft for approval, both based on feedback from the two open sessions plus a need to ensure the verification process noted in the previous recommendation. Further consultations need to continue to ensure the final draft meets the target audiences' needs.
- 3. The Tone and Wording:** MCA noted the tone and wording of the current revised draft has significantly improved. The current draft reflects practices farmers utilize without being prescriptive. Many of MCA's crop committee delegates participated in the drafting sessions, ensuring there was more farmer involvement and that the revised draft incorporated direct feedback from farmers.

Further Action Needed:

- In some areas, caution must be exercised to ensure we are not 'overselling' the work being done by farmers. We must acknowledge farmers are in different stages of their journey in implementing and using various practices related to sustainability. Utilizing statements that could be interpreted by the reader that convey the message all farmers are doing a certain practice should be avoided.
- The practices included in the final draft should aim to be measurable so that progress can be tracked in future editions of this document. This would amplify the story of farmers striving to continuously implement and/or improve sustainability measures on their farms.
- Professional support and expertise need to be sought by the CRSC to develop the content into a document that can be proudly shared by farmers and industry stakeholders to our consumers and end users.

Manitoba Crop Alliance also shares the following recommendations that fall outside the three main areas but need to be considered by the CRSC and its leadership team if the decision is made to continue with next steps.

- In future consultations, greater effort must be taken by CRSC and its leadership team to ensure all farmers can participate. Information must be provided in a timely manner to also ensure consultations are productive and valuable use of farmer's time.
- CRSC must allocate the necessary resources to ensure next steps occurs in a timely manner.
- A detailed communications plan along with associated budget and target timelines must be developed to ensure farmers, industry stakeholders, consumers and end users are aware of the document and that it is being communicated effectively and efficiently.
- SCAP funding should be explored to develop the final document and develop a communications plan for delivery.
- MCA strongly recommends the final document, if approved and released, is reviewed at a minimum every five years to reflect changes in practices used by farmers so that it remains accurate and current.

Manitoba Crop Alliance applauds the efforts of the CRSC in incorporating the feedback heard from farmers during the 2021 consultations. While many of the areas of concern identified by us in our 2021 submission were answered or incorporated into the revised draft version, we continue to have reservations in providing any support or endorsement as significant work remains to take the content developed to date and create a document for use by farmers and industry stakeholders to showcase to customers and end users the practices Canadian farmers employ on their farms to be sustainable.

MCA's board of directors continues to direct staff to work with the CRSC in providing continuing updates to ensure our farmer members are informed of next steps and can engage as needed.

Robert Misko

Chair, Manitoba Crop Alliance