



Responsible Grain Voluntary Code of Practice

Executive Summary of What We Heard and Next Steps

The following is a summary of the consultation results – more details can be found in the Feedback Summary report on the Responsible Grain website: <https://responsiblegrain.ca/>

To obtain feedback on the Responsible Grain draft Code of Practice, an extensive consultation process was undertaken, starting in November 2020, and wrapping up March 2021. Twenty-four consultation sessions were held (22 EN and 2 FR) with farmers and commodity organizations. The consultation process was conducted by Synthesis Agri-Food Network, Guelph, ON.

Over 850 individuals registered to participate with over 92% of these being farmers, mostly from Western Canada. All participants were provided access to an online survey where they could review and comment on the Code practices in detail.

Overall Findings

In general, the majority of participants in the consultation indicated that they do not support the draft Responsible Grain Code of Practice as it is currently written. Respondents provided many comments and suggestions to improve the wording and simplify the document.

General Comments that apply to the Code

Tone of document

- Many perceived the tone of the document as accusatory and would prefer that the Code highlight good things farmers are doing. Some commented that the background descriptions and rationale for each module create a negative tone that will not help to build public trust.

The need for a Code and/or questioning if/how it would directly support public trust and market access

- A significant portion of farmers agreed that they are currently following most of the proposed practices, but felt that formalizing the practices into a Code would not provide any tangible benefits to producers.

Concern that a Code will pave the way for regulations

- There was a significant concern that the proposed Code of Practice could lead to an increase in regulations: by writing down the Requirements, it would provide an outline for future additional

regulations. Similarly, a few commented that these practices would provide a standard that environmental groups would use to their advantage.

Terminology and definitions

- Many respondents indicated that the draft Code wording is confusing. Also, it is too long, there are too many practices and many are redundant or repetitive.

Role of regulations in a Code

- While some indicated that the Code of Practice should be limited to only existing regulations, many responded that it was redundant to include regulations in the Code. These comments indicate that respondents view the Code as something additional to what they must do.

Concerns about who was involved in the process

- Questions and concerns were raised as to why environmental groups, grain companies and crop input suppliers were included in the development of the draft Code, their input and funding of the Code development.

Level of detail

- Many commented that the proposed Requirements and Recommended Practices are too specific and suggested that it should be kept at a higher level and focus on general principles or outcomes.
- Challenge to build a national Code applicable many commented that it's challenging to have a national code that is relevant and applicable in each province, with some viewing it as too complex or "impossible".

Alignment with other existing programs

- Some respondents indicated that the proposed Code of Practice duplicates or should build on existing programs, such as the Environmental Farm Plan (EFP) and the 4R Nutrient Stewardship Program.

Record keeping

- While some indicated that software systems make record-keeping easy, many more indicated that the proposed record keeping requirements are not practical nor needed. Some were concerned that they would need to submit detailed records.

Ensure flexibility to adopt new technology

- Some respondents commented that the proposed Requirements or Recommended Practices do not take into account the most recent practices being used on farms and/or does not allow for the adopting of future technology.



References to use of engineers and other experts

- References to the use of specialists such as agronomists, experts and engineers is viewed by many as increasing costs for farmers and not considered necessary in all cases. Respondents would prefer that the Code reinforce that farmers are in fact experts and are often highly educated specialists.

Feedback on Specific Modules

Respondents provided detailed feedback on the proposed Requirements and Recommended Practices in each of the seven Modules. A detailed report of the feedback for each practice is available on the Responsible Grain website: <https://responsiblegrain.ca/>

The following are overall impressions of the feedback received for each Module.

General agreement with intent but wording changes needed:

- **Pest and Pesticide Management**
- **Seed Selection and Use**

Some agreement with intent but many wording changes and simplification needed (especially in Recommended Practices):

- **Nutrient Management**
- **Soil Management**

Mixed agreement and disagreement:

- **Water Management**
 - The section on irrigation had general agreement but with re-wording
 - The section on agricultural land drainage as written was generally viewed as too vague
- **Health and Wellness**
 - There was agreement with many of the proposed Requirements with wording changes, but the Recommended Practices section was viewed as too specific and should be individual business decisions

Strong disagreement with most of the Requirements and Recommended Practices:

- **Land Use & Wildlife**

The following are the next steps in the development of the Responsible Grain Code of Practice

The Canadian Roundtable for Sustainable Crops is very appreciative of the time that grain farmers spent to provide feedback on the draft Responsible Grain Code of Practice.



In addition to providing their opinion on each of the Code draft Requirements and Recommended Practices and options for rewording, consultation participants asked some fundamental questions:

- ▶ Is public trust really an issue for grain farmers?
- ▶ If we need to improve public trust, how is a Code of Practice going to help?
- ▶ How does this Code fit in with other industry activities in public trust?
- ▶ How is a Code going to help maintain markets?
- ▶ How many markets are we talking about? We already have programs for premium markets that farmers can enroll in if they want – how would a Code fit in?
- ▶ How would a Code of Practice work or be implemented?

The CRSC Steering Committee will be taking the opportunity to focus on these questions by undertaking analysis, leading to a “White Paper”, to further inform discussion on the Responsible Grain Code of Practice. Specifically, we will be looking at:

An assessment of the value and limitations of a voluntary Code of Practice to build public trust.

An assessment of the value and limitations of a voluntary Code of Practice to maintain and enhance markets.

The feasibility of a Code of Practice for Canada’s grains industry, considering the entire supply chain.

We are taking seriously the issues that you raised in the consultations, including the content of the Code, how we communicated about the Code, and how the draft Code was developed. We will examine these thoroughly after we have completed the White Paper.

We hope to have finished the above work by the fall of 2021. Our findings and next steps will be shared with you at that time.

In the meantime, should you have any questions or comments, please do not hesitate to e mail execdir@sustainablecrops.ca

Jason Lenz
Farmer
Chair, Canadian Roundtable for Sustainable Crops Steering Committee

