



TEAMALBERTA

REGULATORY HURDLES



Team Alberta looks forward to working with a government that is dedicated to supporting Alberta's crop sector.

Alberta farmers operate in an environment of thin margins and high capital costs while being at the mercy of markets and weather. Further, they have a unique and variable operating structure, which is largely incomparable to other sectors. Farmers require transparency, consultation and accountability from government with respect to regulatory decisions that could implicate their operations. Farmers rely on a streamlined, science-based regulatory environment that supports the access to tools that allow for competitiveness.

Regulatory barriers exist at both the provincial and federal level. Farmers look to the provincial government to support farmers in responding to regulatory hurdles and also for support in identifying and overcoming federal regulatory risk and amplifying farmers voice in overcoming federally derived obstacles that can impede the competitiveness and growth of Alberta's agriculture sector.

Provincial Regulatory Environment

At the provincial level there are a number of critical regulations that govern the operations of crop sector farmers:

Pest and Disease Management

Disease pressure is a serious issue for Alberta farmers and has an economic repercussion for the province. The ability for farmers to apply integrated pest management (IPM) practices along with associated research to derive disease resistant varieties has been recognized as the best line of defense for minimizing the spread of air-borne and soil-borne disease through our province. Inclusion of specific disease related pests in *Alberta's Agricultural Pest Act* comes with a 'zero-tolerance' policy which attempts to stop the spread of the disease, which is not achievable with soil borne or airborne pathogens; such as Fusarium Head Blight (FHB), which affects cereal crops. Current policies would also require restrictions on the movement of soil, water and air to be effective in stopping the spread

of these diseases - which is simply not possible. FHB is now established in many regions of Alberta, adoption of best management practices and enabling research in our province is the proactive approach to managing diseases.

The current regulatory environment curtails: in-field research of control systems because they may contain low levels of the pathogen, limits farmers accessibility to disease resistant seeds putting them at a competitive disadvantage to other jurisdictions and doesn't allow for adaptive regional regulatory systems based on infection levels. We would like to see the government focus on education and extension as part of an integrated approach to disease management along with removal of certain pathogens from the Pest Act i.e. *Fusarium graminearum*.

Pest Surveillance

Surveillance of pests and disease across Alberta is a priority for Alberta's producers, and a cornerstone to any sound pest management strategy. Several recent applications for national funding support to deal with the surveillance of pest and disease impacting the crop sector have been redirected back to industry stating that the

provincial governments have funding to contribute to such efforts. The effects of pests and disease can have a significant financial impact on the cropping sector, and Team Alberta encourages AF to direct funding to engage in surveillance projects, like the Fusarium Head Blight risk maps, to enable early warning communications and risk mitigation for the sector.

Bio-fuels

The Renewable Fuel Standard (RFS) is set to expire January 31, 2020. Despite extensive consultations over 2015 to 2018, the Government of Alberta failed to reach a decision on modernizing the regulation, leaving the sector vulnerable with respect to the future of low carbon biofuels in less than 12 months.

Modernizing the regulation would protect current investments in Alberta-based low carbon fuel production. This would attract private sector investment to expand and build new capacity to meet growing market demand under the national Clean Fuel Standard (CFS) and supply Low Carbon Fuel Standards (LCFS) export markets like California, Oregon and Washington. In addition to demonstrable environmental benefits, producing low carbon fuels in Alberta supports agriculture, diversifies the economy and provides secure, clean energy jobs. **The Government of Alberta needs to take a leadership position to protect the future of low carbon biofuels in our province.**

- Canola biodiesel reduces GHG emissions by up to 90% compared to fossil diesel.
- CO₂ released by a vehicle fueled by canola biodiesel is offset by the CO₂ captured when the crop is grown.
- Expanding the current RFS for diesel from 2% to 5% will reduce emissions by 4.8 mega-tonnes per year when met by canola biodiesel. That's equivalent to taking 1 million cars off the road AND that's 16% of the annual CFS reduction objective annually for all sectors combined.

Federal Regulatory Environment

We ask that the provincial government support Alberta's farmers by amplifying the following messages at the federal level:

The Pest Management Regulatory Agency (PMRA)

Current proposed decisions by the Pest Management Regulatory Agency of Health Canada has threatened critical tools - specifically seed treatment pesticides, that will have a significant impact on grain production in Alberta, which will result in revenue reduction, decreased contributions to GDP, lost jobs and could even force a number of Alberta's crop producers to exit the industry.

If farmers continue to lose access to valuable tools such as seed treatments while our competitors in other countries continue to have access to them, pest-management will become even more complex and costly. Further, Alberta's farmers will be at a competitive disadvantage compared to their counterparts in other jurisdictions.

While of federal jurisdiction, our concern is that the decision-making process being employed by the PMRA is flawed. There has not been a consideration of the cost-benefit of such decisions since factors such as alternatives, mitigation and economics are beyond the current interpretation of their mandate. Further, regionality and differences in farming practices across the country has not been considered.

Farmers must have the appropriate tools to defend their crops against pests. If tools such as seed treatment pesticides are no longer available, other solutions, some of them with negative effects on the environment and human health, will be used. For this reason, among many, it is imperative that the PMRA considers factors beyond their current mandate.

When tools that ensure we can compete on the global stage are at stake farmers look to the provincial government to support the needs of farmers and amplify our message.



Team Alberta represents a working collaboration between four of Alberta's crop commissions: Alberta Barley, Alberta Canola, Alberta Pulse Growers and the Alberta Wheat Commission.

We work together with the aim to provide input to policy makers, ensure long-term access to markets, promote the sustainability of the crop sector, and advocate on behalf of farmers while enabling grass-roots advocacy by our farmer members themselves.