



June 28, 2024

Honourable RJ Sigurdson
Minister of Agriculture and Irrigation
Via email: AGI.DM@gov.ab.ca

Re: Invitation to Share your thoughts on Challenges faced by Alberta's Primary Agriculture Sector

Dear Minister Sigurdson,

On behalf of Team Alberta Crops we write in response to your May 28th email to highlight those challenges that are a priority to the seven partner commissions that represent approximately 30% of Canadian crop production and 40% of Canadian honey production. In addition, our partners have distributed the survey to their individual members for their feedback.

Alberta farmers have overwhelmingly adopted beneficial management practices (BMPs), technologies and innovations. Farmers are also taking advantage of new market opportunities to increase productivity and Alberta's contribution to the global food chain. Further growth in the industry is indeed hampered by red tape affecting areas that include value-added processing, transportation, taxation, environmental regulation and more.

Below and in no particular order are areas that Team Alberta Crops affirms to be of high priority and will make the greatest contribution to the ongoing growth, prosperity and sustainability of Alberta's crop and honey sector.

- **Right to Repair** –Bills are slowed down in the Senate and greatly impact producer profits. When and if passed, provincial legislation will also need to be passed.
- **Federal Tax Changes** – The federal government's increase to capital gains inclusion rates will have a profoundly negative impact on long-term farm viability effecting farm succession and new entrants to the industry.
 - The corporate small business tax deduction of \$500,000 has not kept up with inflation. The low deduction negatively impedes farmland succession and acts as a tax on farmer pensions. Ideally, the deduction should get doubled to \$1



million. What qualifies as a tax deduction is also an issue and there needs to be qualified farmland.

- **Energy Costs** – The cost of energy including the cost per kilowatt hour and the cost of rate riders for transmission place a high financial strain on Alberta farmers.
- **National Biodiversity Strategy** – The government of Canada has released Canada 2040 Nature Strategy as of June 14. The strategy is a threat to the agriculture industry as it works today based on the implication to core farm practices, especially the use of pesticides. This is in direct conflict with Senate of Canada Standing Committee on Agriculture and Forestry’s study on soil health that highlights pest control’s role in promoting soil health.
- **National Data Management Strategy** – There is a need for a national data management strategy. Currently there is a lot of data being collected for BMPs, the integrated pest management framework and how it fits into the national biodiversity strategy. [Canada’s National Index on Agri-Food Performance](#) is also working to benchmark sustainability. This demonstrates that there is an abundance of surveys collecting data that adds to the burden requested of farmers resulting in survey fatigue. In many cases this is in addition to expanding regulatory and data reporting requirements for producers to comply with the Safe Food for Canadians Act, the Canadian Seeds Act and requirements made by end use customers and retailers. A more coordinated approach will improve data quality and should ensure farmer’s data is secure.
- **Cross Compliance on Environmental BMPs and the Decoupling of Environmental goals and BMPs with Business Risk Management Programs** - Continued efforts on these issues needs to be communicated while assuring farmers that the suite of business risk management programs is reliable and reflective of the widely varying conditions and techniques used to grow crops.
- **Pesticide Regulatory Compliance/Pest Management Regulatory Agency and Pesticide Management Centre lack of Agency** – Thank you Minister Sigurdson for your strong advocacy on this file. There is a lack of funding to keep the regulatory process moving smoothly. Communication is slow and challenging and still not transparent. The minor use program needs to be supported as well. Another example is approval of pesticide application using drones. This technology is current, marketed in Canada and being used in other countries but the regulatory situation is slow in Canada. There exists a need for regulatory harmonization with other major countries like the United States.
- **Research Priorities** - Research funding priorities and scientific capacity must reflect



the needs of the sector and include opportunities for matching funding support for critical issues.

- **Land titles** – While the wait time has been improved, ongoing work to reduce the wait time for land title changes will benefit farmers.
- **Labour** continues to be a challenge for farms. We need to ensure the federal government continues to provide temporary foreign workers the opportunity to fill gaps.
- **Renewable Moratorium and Agricultural lands** – As the Ministry of Affordability and Utilities prepare the regulations, we respectfully request the opportunity to review the impacts on agricultural lands and provide feedback before the Bill goes to the Legislature.
- **Loss of farmland** – Urban sprawl and utilizing agricultural lands for uses such as renewable energy generation and oil and gas extraction hamper the ability of agriculture to expand and grow productivity. Government policy around Land-Use Frameworks, regional planning and land-use plans must give higher consideration of the integral role of primary agriculture in Alberta.
 - In addition, Alberta farmers could benefit from changes to policies surrounding reclamation, land disputes and what is considered fair compensation.
- **Transportation**- Largely reliant on exports, transportation to and through the ports is essential. Continued improvements to infrastructure within Alberta are needed to improve the safety and reliability of the movement of goods.
 - Rules supporting the unfettered and reliable movement of goods to and from port and the loading and unloading of ships should be instituted.
 - Continued improvements are needed for road infrastructure, such as the twinning of Highway 3 improve the safety and reliability for the movement of commodities, inputs and people.
 - Diversity in options including rail expansion will benefit agriculture.
- **Value-Added Investment** – Alberta has made considerable improvements in its efforts to attract value-added investment. This includes our innate competitive advantages and tax-based incentive programs. The Highway 3 Agri-Food corridor is a shining example of this success. Ongoing efforts in attracting value-added investment will continue to grow Alberta’s economy.
 - Demands for biofuels continue to grow. Alberta canola and sugar beets can play a major role in developing this industry further.
 - The Government of Alberta should further develop cross-departmental



resources to assist small and mid-sized Agrifood opportunities come to fruition in our province.

- E.g. Resources to help Agrifood projects navigate processes required to navigate the municipal water regulatory system.
- **Provincial Water Management Strategy** – The water management strategy for Southern Alberta and key investments have proven to be of great benefit to agriculture. A province-wide strategy to better manage water and deal with challenges related to drought and excess water will build resilience and the long-term sustainability of Alberta agriculture.
 - The increased variability in weather will start to place a strain on programs such as crop insurance and AgriStability and demonstrate the need for tools to mitigate unfavourable/unworkable growing conditions.
 - Irrigation should be expanded to other areas of the province. (E.g. Peace Country.)
 - Ongoing improvements to existing irrigation are needed to improve storage and conveyance efficiencies.
 - Other provinces are currently utilizing technologies such as tile drainage to manage water. Alberta will benefit from a comprehensive approach that begins with the most drought and flood susceptible areas in the province and look at opportunities to drain excess water in to predetermined areas where it can be stored and pumped back onto land when it is needed.
 - Permitting dugouts can be prohibitive in cost. Changes in regulations would greatly increase the resilience and sustainability for on-farm water management.
 - Ditches in Alberta are vital to the management of excess water and require adequate design, funding and maintenance.
- **Federal and Provincial Plastics Registries**
 - Currently there are competing regulations around the registration of plastic usage in Alberta. While we operate under the Alberta Plastic Registry, we now must operate under the Federal registry too. There is some ambiguity as to how this reporting will be implemented but we are hoping there will be some harmonization to reduce the reporting burden on Alberta producers.
- **Carbon Border Tariff Adjustments** - Carbon Border Tariff Adjustments in jurisdictions like the European Union are subjecting goods such as concrete and steel to tariff adjustments if the trading jurisdiction does not have a comparable price on carbon.





These types of tariffs are a threat to producers and will negatively impact food prices and export opportunities.

- **P2 Primary Produce Packaging Regulations** - ECCC's new policy will have a significant impact on the primary produce industry in Canada.
 - Negates the benefits of SR&D efforts to reduce food waste through packaging innovation. Industry has invested significant dollars to design packaging that is environmentally conscious and will significantly reduce food waste by maintaining quality and increasing shelf life.
 - The food supply chain in North America is highly integrated with the United States. Introducing policy that affects our supply chains reduces our ability to deliver a cost-efficient product to our customers.
 - If trade with Canada becomes problematic for American packing facilities, Alberta will have to move product from Eastern Canada to fill gaps in our supply chain. This will increase, greenhouse gas production, food waste and will result in increased food costs for the Canadian consumer.
 - Costs involved with redesigning packaging facilities are especially prohibitive on small businesses. For example, a company that produces seed potatoes can divert excess product into the table market if they have appropriate packaging capabilities. However, if regulations change that require retooling of packaging facilities, it may no longer be financially viable for this company to maintain the packaging capabilities. The alternative is then to discard of excess product thereby lessening the resilience of the food production system.

In closing, thank you Minister Sigurdson for your continued advocacy for Alberta agriculture and efforts to identify and address the challenges facing primary producers. Our partnership is confident the above measures all play a major role in our sector's ability to maintain and grow their operations and look forward to continued discussions in this area. Please feel free to contact us at any time for additional feedback.

Respectfully yours,

Team Alberta Crops





Tara Sawyer, Chair
Alberta Grains

Curtis Miedema, Chair
Alberta Beekeepers

Roger Chevraux, Chair
Alberta Canola Producers Commission

Shane Strydhorst, Chair
Alberta Pulse Growers

Brian Ellis, Chair
Alberta & BC Seed Growers

Gary Tokariuk, Chair
Alberta Sugar Beet Growers

Alison Davie, Chair
Potato Growers of Alberta

