Organic Council of Ontario
The Voice for Organics in Ontario

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To whom it may concern,

The following document is in response to the Government of Canada's call for feedback on the forthcoming Sustainable Agricultural Strategy (SAS). The Organic Council of Ontario (OCO) welcomes the opportunity to provide feedback on this groundbreaking agroecological plan and hopes to see an ambitious plan with concrete, meaningful steps towards true agrifood sustainability. OCO is the only full value chain organic association operating at the provincial level. We represent over 1,400 certified organic and uncertified ecological food producers, as well as the businesses, organizations, and individuals that bring food from farm to plate.

We would like to preface this by clarifying that we will not be delving deeply into all of the individual questions posed by the Government of Canada in the Sustainable Agricultural Strategy Discussion Document; **OCO fully supports the comprehensive submission entered by the Canada Organic Trade Association (COTA) and Canadian Organic Growers (COG) on behalf of the Canadian Organic Alliance.** Rather than duplicating their submission, we wish to provide some higher-level commentary on the goals and desired outcomes of the SAS overall and how the organic sector fits into the picture.

The SAS discussion document proposes the following ideal outcomes of the SAS:

- *Production is more resilient to climate change;*
- *GHG emissions in the agriculture sector are reduced;*
- *The [agricultural] sector has increased capacity for carbon sequestration;*
- *Use of energy efficient and clean technologies on farms is increased;*
- *Biodiversity-rich landscape features are maintained and/or improved on agricultural lands (for example wetlands, grasslands, and treed areas);*
- *Ecological services are measured, maintained, and sustainable;*
- *A more comprehensive approach to water management is taken in agriculture.*

Additionally, the discussion document emphasizes that *"Climate, biodiversity, water, and soil health issues are tightly linked, and are themselves influenced by social and economic factors. … This complicates the design of effective interventions and understanding the impact of individual investments, however it provides opportunities to seek solutions that can address more than one environmental issue at the same time."*

If there is one central point that we wish to strongly emphasize, it is that solutions to complex problems need not be complex themselves, nor do we need to wait on new technological breakthroughs to make meaningful differences; **organic agriculture directly supports the overwhelming majority of SAS's proposed ideal outcomes and has been effectively tackling climate, biodiversity, soil health, and socioeconomic issues in agriculture for**

decades. Supporting the expansion of Canada's organic sector with Canada's agri-environmental strategy, as the EU has done[1], should be an easy decision to make.

Organic farming prioritizes resilient agroecosystems reliant on robust, healthy soils and biodiversity to manage agronomic problems. As such, organic farms have a clear established history of improved biodiversity[2], and the higher soil organic matter content of organic farms provides a plethora of benefits such as improved carbon sequestration, better water retention, reduced soil erosion, and improved resilience to variable climate conditions[3]. Additionally, organic management protects freshwater sources as nitrogen and pesticide leaching are not concerns; organic farms protect the environment far beyond the borders of the farm itself. Supporting organics is therefore a straightforward approach to actualizing many of the agri-environmental benefits envisioned in the SAS.

While critiques of organic production often focus on yield losses, this criticism may be addressed from two angles. First, yield losses in organics are not necessarily intrinsic. Evidence indicates that the yield gap closes between organic and conventional systems over time as organic fields become established. Furthermore, organic yields tend to remain consistent in the face of challenging weather, particularly in the case of drought[4]; not only does this improve food system resiliency in the face of climate change, but suggests that if organics were expanded, it may substantially reduce costs to operate subsidized crop insurance. Additionally, organics have not benefited from the same prolonged and intensive funding and research efforts as conventional agriculture. There is a significant argument to be made that organic yields could be improved if substantially more agronomic resources were dedicated to optimizing organic production systems[5].

Second, it must be considered that the higher yields often attributed to conventional agriculture are reliant on the heavy use of agricultural inputs and the externalization of significant environmental costs. The cost of these high yields, biologically and ecologically speaking, is not possible to sustain indefinitely. Improved efficiency of input use has a role to play and may close some of the gap, but efficiency measures can only do so much. Additionally, the resources required to produce certain inputs are inherently non-renewable and will eventually be exhausted. Adjusting production practices to a truly sustainable level that accounts for environmental externalities and the limitations of efficiency measures may unavoidably require some degree of reduction in conventional yields. It can be argued that organic agriculture is already much closer to a "full-cost accounting" of the true ecological and financial costs of producing food. Combined with organics' greater resilience to climate disruptions, this lends a noteworthy level of predictability to the output of organic production. Additionally, improved uptake of organic practices may help insulate producers from supply chain disruptions and price spikes for inputs (such as fertilizer), improving food system stability overall. This context is important when considering the relative economic, social, and ecological sustainability of food production.

We also wish to emphasize that, while we are wary of approaches that prioritize economic performance over genuine sustainability, the organic market is strong and growing, both domestically

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[1] See the EU's Organic Action Plan; we note that the SAS discussion document acknowledges the EU goal to have 25% of its farmland under certified organic production by 2030

[2] IFOAM 2022 [pg. 6-7, 10-11]; Stein-Bachinger et al., 2020

[3] NSAC 2019 [pg. 20, "Organic Farming, Carbon Sequestration, and Greenhouse Gas Mitigation"]; IFOAM 2022 [pg. 6-8]

[4] IFOAM 2022 [pg. 2, 8, 10]

[5] NSAC 2019 [pg. 20, para. 4]

and globally. Domestic production has never kept pace with the demand for organic products in Canada. In Ontario, Canada's largest domestic market for organics, this is particularly true - there is a high reliance on imports, many of which could be produced domestically at significant benefit to Canadian soils and farmers. Beyond Canada, international demand for organics spiked during the pandemic and continues to rise; global sales of organic food & beverages reached $129 billion USD in 2020, a 15% (or $17 billion USD) increase from 2019. Canada's closest trading partner, the USA, is the world's largest organic market, and other key trading partners such as the EU are also seeing a rise in demand for organics. Expanding support for organics under the SAS would be an easy way to ensure that the SAS "… would support Canada's position as a key producer of in-demand sustainable food and agriculture products.", meeting domestic needs while also keeping Canada's agrifood sector globally competitive.

In summary, the question should not be *whether* the SAS should include supports for the organic sector; it is evident that it should. The SAS's desired outcomes are naturally aligned with the fundamental underlying principles and outcomes of organic production. *How* the SAS could maximize the potential of the organic sector in achieving its goals must now become the focus. COTA has already outlined a very comprehensive set of suggestions in their submission, which OCO strongly suggests that AAFC take into consideration. We will only highlight a handful of higher-level but crucial steps that we would suggest as core priorities:

1) Incorporate an organic acreage target in the SAS, as done in the EU

Canada should follow suit with the EU in utilizing an organic acreage target as a means of reaching their agricultural sustainability targets. The EU proposed an ambitious target of 25% of their agricultural land under organic production by 2030, from 8.5% as of 2021 - this represents an approximately 17% increase over 9 years. Currently, organic production represents approximately 3% of Canada's farmed acres. We suggest that if an identical approach were taken, a comparable Canadian target would therefore be 20% of Canadian agricultural land under organic production by 2032.

Alternatively (or in addition), a target could be set on the number of producers transitioned to organic. This target could be national in scope, or provincial targets could be set (for example, 15% of each province's farmers transitioned by 2030). There is significant evidence that the more farmers in an area transition, the more farmers are likely to transition; community matters, and the move towards organics in a geographic area often becomes self-perpetuating. Additionally, the benefits of organic production, particularly for biodiversity, are best realized in a situation where many farms in an area are under organic management, rather than one organic farm surrounded by conventional operations. Particular incentives could be provided for transition in ecologically sensitive areas, to help maximize these benefits.

2) Support expansion and maintenance of organic production through transition support funding and certification cost-share

Fundamentally, any aspiration to expand the sector requires new investments to support farmers to transition. Canada is substantially behind other jurisdictions when it comes to investing in organic support systems, and as such, there are significant barriers to transitioning to organic or even maintaining organic certification.

Perhaps the most prevalent barriers are the financial expenses associated with transition. In order to certify, a 3-year transition period is necessary; this transition period can be highly precarious for farmers, who must learn and implement organic production practices and get past the initial period of yield loss while the soil rebuilds, but without being able to claim an organic price premium. For some forms of production, such as livestock or greenhouses, significant structural renovations may be required to facilitate organic production, which can be quite expensive. Quebec saw tremendous success with a comprehensive set of transition support programs that helped cover these initial costs. Businesses were eligible for up to $20,000 to cover transition-related expenses, split between pre- and post-certification. Generous cost-share was also offered to hire organic agronomic specialists for support. While this program ended as of March 31st, 2023, we suggest that it could be considered as a model for a nation-wide support program.

Additionally, farmers must be supported in retaining certification. The SAS discussion document recognizes the need to maintain public trust and transparency; organic certification fundamentally promotes this. Unlike other sustainability claims, organic certification is a publicly-owned and maintained set of production standards that are internationally recognized and routinely, transparently updated. To support this system, Canada should invest in cost-share programming to make it easier for farmers to maintain their certification. Such programming is already available to organic farmers in the USA, where 50% of certification fees up to $500 USD may be reimbursed[6]. Acquisition and maintenance of certification is critical to unlocking the public benefits of the organic sector, fostering public trust and transparency while simultaneously maximizing the economic and trade benefits of organic sector expansion. To this end, we also suggest that the Government of Canada dedicate permanent funding for the required five-year review of the Canadian Organic Standards; Canada is an outlier in not making this commitment, and it is a necessary one to keep the public trust of Canadian consumers and international trading partners.

3) Increase investment for public research, extension, and Knowledge Translation & Transfer (KTT) in organic production systems

More public funding must be dedicated to research and development in the organic sector. The low-input nature of organic production is key to many of its public benefits, but simultaneously limits interest from private entities in the kind of expensive R&D undertaken for decades in conventional agriculture. More public research attention is needed to realize the full potential of organic production systems, improving efficiency while retaining organics' plethora of climate, social, and environmental benefits. It is crucial to recognize that investment in organic research is not sequestering resources into a niche system. Organic production practices can be used to the benefit of ALL farmers, not only those looking to fully transition. Investing in organic research broadly expands the "toolbox" available to every Canadian farmer; this expansion will be crucial as weather becomes less predictable, supply chain disruptions complicate affordability and accessibility of traditional inputs, and target-organism resistance to traditional herbicides and pesticides intensifies. Aside from traditional academic research, farmers should be directly supported to continue the self-directed on-farm research especially prevalent in organics. Supports should be provided to lower the risks of farmer-designed and led trials, and farmers should be compensated to teach their best practices to others. Additionally, organic farmers must often innovate when it comes to on-farm technology, as their equipment needs may vary in ways not accommodated by what's available standard on the market; organic farmers who produce new equipment or technologies to support sustainable farming practices should have access

[6] NOP Certification Cost-Share Program

to start-up funding or other market pathway supports to enable the spread of these technological innovations.

Simultaneously, increased investment in publicly-funded organic extension supports and KTT is necessary to ensure that the research being done is broadly disseminated and understood by producers. Access to adequate organic agronomic expertise is a challenge we have long observed in Ontario, one we have heard echoed by other provincial counterparts. Often, even if research has been done that could support an organic farmer with a particular problem, they are either unaware of the findings or the support is not there to help them translate the research to practical applications on their own farm. Curtailing of public extension services has led to increased reliance on input suppliers (who are neither knowledgable or incentivized to provide information about low-input organic practices) for agronomic support. This situation does all farmers a disservice, leaving organic farmers disproportionately under-supported while simultaneously limiting the range of practices conventional farmers might access to manage problems even without the intent to fully transition. More research is necessary, but will have limited impact on its own if investment is not simultaneously made to improve dissemination of findings in an accessible, easy-to-understand format, with personnel made available to assist farmers in applying the knowledge to their own specific operations.

These priorities would set a clear aspirational target while filling key prerequisites for success, eliminating central barriers to sector expansion. Ideally, these priorities should form part of a broader national strategy on organic production that would match production supports with marketing efforts. The national industry associations comprising the Canada Organic Alliance are currently in the process of developing such a strategy, and we hope to see formal support for its development and implementation by the Government of Canada.

Canada's organic sector has tremendous potential to push forward the SAS's key priorities. For too long, organics has been operating on the sidelines, flying under the radar. But as the world struggles under the increasing impacts of climate change and the priorities of the agricultural sector unavoidably change, it is time that the organic sector is supported to step up and share the solutions we have been developing and validating for decades. We greatly appreciate the opportunity to provide feedback on this tremendous initiative, and we look forward to seeing the final SAS released.

Signatures:

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The Organic Council of Ontario (OCO) is the Voice for Organics in Ontario. We represent over 1400 certified organic operators, as well as the businesses, organizations, and individuals that bring food from farm to plate. We work to catalyze sector growth, support research, improve training, increase

data collection, encourage market development, protect the integrity of organic claims, and inform the public of the benefits and requirements of organic agriculture.