

BFF Submission to the Next Generation of Agriculture and Agri-Food Policy

The Beyond Factory Farming Coalition is pleased to be able to provide input during these public consultations on federal agricultural policy. Our coalition is a national organization whose membership includes over 40 national, regional and local civil society organizations representing tens of thousands of Canadians. Our common mission is to promote livestock production that supports food sovereignty, ecological, human and animal health as well as local sustainability and community viability and informed citizen/consumer choice.

Principles

In reviewing the Principles guiding the APF II, there are several points that stand out as serious concerns.

The first principle statement is about promoting a competitive and profitable agriculture and agri-food sector. We would like to point out the contradictions that result from lumping “agriculture” and “agri-food” together in one category, as there are conflicting interests. We understand “agriculture” to mean primary production, while “agri-food” means further processing through to retailing. The background documents speak about building the profitability and competitiveness of the “agriculture and agri-food” sector without recognizing that the profitability of much of the agri-food sector is based upon obtaining low priced commodity inputs from the “agriculture” sector. The competitiveness of Canadian “agriculture”, when we are speaking of commodity production, is based on low prices – seeking “competitiveness” for agriculture is to seek less and less profitability for primary producers.

- We recommend that the federal government create separate policy processes for primary agriculture and agri-food processing, so that policies can be created with clarity and transparency. The two policy streams can be linked together later, perhaps under the auspices of a national food policy.

The principle of enabling technological innovation must be tempered by recognition that innovation is not a good in itself – it is only valuable according to the context, use, and social, economic and environmental impacts of the technology.

- We recommend that technological innovations be assessed for social, economic and environmental impacts. No government subsidies or regulatory exemptions should be given for technologies that would have adverse impacts.
- We are opposed to cloning of livestock, and oppose cloned meat and milk being allowed into the Canadian food supply.
- We are opposed to the introduction of genetically engineered livestock, whether for breeding purposes, production of pharmaceuticals, or any other purpose.

Fostering a regulatory environment that leads to innovation and prosperity must involve regulatory requirements that are clear, enforceable, provide minimum standards, and provide for health, safety, environmental protection. A regulatory system that has adequate capacity to enforce and ensure compliance will gain the confidence of consumers and international customers. We are concerned about the popularity of so-called “smart regulations” that off-load regulatory authority onto private third parties, or permit voluntary compliance, self-regulation, and adoption of trading partners’ rules and inspection services. This is also known as letting the fox guard the chicken coop. The regulatory system must be effective and fully accountable to the public. We would also like to point out that strict regulation is a something that can drive innovation (not suppress it): “necessity is the mother of invention”. Public health and safety must not take a back seat to commercial interests.

- We recommend that the regulatory environment for agriculture and agri-food be transparent and publicly accountable, and provide clear, enforceable, minimum standards, to ensure health, safety, and environmental protection

- We also recommend that the regulatory system recognize difference between high-volume, high-speed production for export, and smaller scale, more labour-intensive production for local, regional and domestic markets. Inappropriate regulations for the scale and purpose of the operation have been used unfairly to push smaller producers and processors out of the market.

The Principles document states prosperity as a goal. Prosperity must mean the creation, and fair and equitable distribution, of true wealth, not just transfer of wealth from the small farmer to the big agri-business enterprise. Prosperity must mean the creation of stable, long-term capacity to meet our needs as a society – not just inflated stock prices for agri-business corporations.

Any publicly supported program contemplated by a new policy must acknowledge the distinction between business ownership structures at the producer level. A family farm entity and family farm corporation, whereby most of the labour, management and investment are made by someone in the family is different from a corporate agri-business investment scheme. Cooperatives can be considered to be a collective of family farms.

The Principle encouraging the agri-food sector to profit from consumer demands for quality food (safe, healthy, environmentally friendly) is commendable, but the emphasis should be reversed. We would like to see a principle that ensures Canada's food and agriculture policy will respond to consumers (ie citizens') legitimate requirements for food that is healthy, safe, nutritious, and produced in a manner that enhances ecological sustainability and social equity. The agriculture and agri-food sector should provide these values as a matter of normal practice, not simply see these quality demands as a niche market to exploit for private gain.

- We recommend that the principle of responding to consumer demands for healthy, safe, nutritious and environmentally sound food be implemented through support for an agriculture system based upon always taking good care of the soil, water, and air.

One of the most serious and pressing food safety issues is food-borne illnesses due to antibiotic resistant bacteria contamination. The World Health Organization has recommended that all countries eliminate the use of non-therapeutic antibiotics in livestock production. Canada still permits the routine use of sub-therapeutic antibiotics in livestock production, and has made only limited efforts to monitor such use and track the incidence of antibiotic resistant bacterial contamination of meat. Even so, results show very high incidences of antibiotic resistant contamination of meat. Yet instead of eliminating the problem at the source, the CFIA campaigns to have consumers wash their hands more often! Furthermore, agri-food policies have supported the increasing centralization of livestock slaughter and meat processing. Canada's ability to prevent widespread illness caused by the centralized distribution of contaminated meat has been compromised.

- We recommend that Canada ban the use of antibiotics for non-therapeutic purposes in animal agriculture and that a comprehensive antibiotic use and antibiotic resistance occurrence monitoring and surveillance program be fully implemented.
- We recommend that meat processing be decentralized.

The Principle of advocating for greater market access and clearer trading rules must be done in a manner that respects other countries' legitimate need for food security and food sovereignty. If countries have democratically decided that they do not wish to eat meat that has been raised using growth hormones, for example, Canada should respect that. If Canada wants to serve that market, Canada should meet the importing countries' food quality requirements. Canada also must respect the importing country's domestic food system, and not attempt to take market share away from local farmers by dumping Canadian product on their market. Similarly, Canada should not be dependant on other countries for food or markets. Our agriculture and agri-food system

should provide for local and regional production of all types of food required for a balanced diet (see Canada's food guide), and not just specialize in a few commodities in order to serve export markets.

- We recommend that Canada respects the food sovereignty of other countries when engaged in agricultural trade.
- We recommend that Canada make local and regional food self-reliance a pillar of agricultural policy.

Setting the Context

The Setting the Context background document minimizes the role of the medium and smaller producer in Canadian agriculture and in rural communities. The authors of the background document use faulty assumptions to interpret statistics – mistaking symptoms for causes, and thus missing the real problem altogether. Primary producers have been subsidizing agriculture with unpaid labour and unremunerated capital investment for over twenty years. The farm families of Canada have produced \$686 billion worth of products during this time, and their net income from the market has been \$0.00. If young people are not entering farming, if farm family income is not contributing to rural community viability, if equipment and farm capital is deteriorating, it is due to the failure of Canadian agricultural policy to ensure that farmers get a fair return for their labour and investment from the market. To suggest that primary agriculture is increasingly insignificant to the agriculture and agri-food sector is not only insulting to the people who produce our food, it is erroneous. Primary production is the foundation of Canada's food system, and inadequate and inappropriate federal agricultural policies are rapidly undermining it.

- We recommend that the APF II's top priority be ensuring fair and adequate returns to family farmers engaged in primary production.
- We also recommend that farm returns be adequate to pay farm labour fairly. The increasing reliance of industrial agriculture on temporary migrant workers that do not have the full rights of citizens must be turned around.
- We recommend that mechanisms such as the single desk for hog marketing be re-instated and expanded to other products, and that supply management systems be protected (allowing for adjustments to encourage more young farmers, seasonal production and smaller scale/local-oriented production)

The Setting the Context document also failed to mention climate change. Of all economic sectors, agriculture is probably the most sensitive to the impacts of climate change. Agriculture has a role to play in reducing Canada's contribution to climate change by reducing the GHG emissions in production methods and food transportation. Agriculture also needs to build methods of coping with problems – such as flooding, drought, heat waves, new disease pressures, early frosts, more intense storms, insect infestations, etc. – that can be expected as our climate becomes less stable.

- We recommend that you add the following to your Guiding Principles: Enabling the sector to reduce its GHG emissions, and building the sector's capacity to deal with the challenges associated with an increasingly unstable climate.
- We further recommend that the APF II promote increased on-farm diversity – crop and livestock genetic biodiversity on farms, mixed farming, diversity sizes of farming operations, etc. in order to build economic and ecological stability and resilience into our food system.
- We recommend that livestock production using anaerobic liquid manure systems that contribute large amounts of nitrous oxide, methane, and ammonia, to the atmosphere, be eliminated.
- We recommend that production and processing of livestock be decentralized in order to reduce GHG emissions from transportation of livestock and meat.

In light of the fact that the APF II is focussing on long-term policy, it is imperative that peak oil be part of the context. Petroleum industry experts have documented the expansion, levelling off and reduction in the quantity of fossil fuels being extracted world-wide. The precise date of the peak oil production may not be known, but it is clear that petroleum will be increasingly expensive to produce over the next decades. Agriculture is highly dependent on oil and gas for inputs such as fertilizer and pesticides, for on-farm power (diesel tractors), and for transportation to processing plants and markets. Biofuels do not have the capacity to replace fossil fuels. Policy needs to recognize the implications of energy costs going up, and provide ways for agriculture and agri-food to reduce their energy requirements.

- We recommend that energy intensive production systems such as factory farmed livestock be phased out, that processing be de-centralized, and that the development of local, self-reliant food systems be supported.

Business Risk Management.

The current CAIS program is skewed to provide an unfair proportion of payments to intensive livestock operations (ILOs). Since CAIS deals with the income of the whole farm, those farms that have diverse production will have the better-paying parts of their operation support the money-losing parts. However with an ILO, there is only one source of revenue – the livestock. If livestock prices go down, the ILO will get a CAIS payment. Furthermore, with the hog industry for example, government policies have resulted in over-production due to a highly capitalized production system that is unresponsive to price changes, resulting in low prices. It is not fair that ILOs consume large amounts of CAIS payouts, which the average Canadian believes are going to struggling family farmers.

- We recommend that CAIS or other BRM programs be capped to ensure that safety net money goes to support small and medium sized producers and not be disproportionately provided for industrialized agri-business operations.
- We recommend the BRM programs be designed to support the survival and establishment of more family farms, young farmers, and farms providing a diversity of foods to enhance local and regional food self-reliance.
- We recommend that BRM programs be designed to support transition to environmentally sustainable forms of production, such as certified organic, pastured pork and grass-fed beef.

Environment Pillar

It is interesting that the discussion paper for Environment is so heavily qualified by the constraints of overlapping jurisdictions and competing interests, while discussions of the other aspects of the APF agenda are not. Agriculture and the Environment are intimately linked – crops grow in the soil, they require water and sunshine, wind, pollinating insects, etc; animals need food, clean water, healthy air quality, etc. To try to separate agriculture from the environment is an impossible task – though it is one that policy makers and industrial agriculture promoters keep trying to do. The result is fouled water, polluted air, pest and disease problems, and on and on. When agriculture is based upon ecological principles -- everything is connected to everything else; in the web of life, diversity provides stability and resilience; and there is no such thing as a free lunch -- you get reliable food production, healthy soils, clean water and fresh air. Agriculture systems based on ignoring or defying ecological principles may bring short term profit to a few, but it is inherently unstable and will be very costly in the long run.

- We recommend that all agriculture policies be evaluated on the basis of their long-term environmental impact. Business Risk Management and Regulatory policies must be designed to enhance long-term sustainability of the ecological foundation of agriculture – namely crop and livestock biodiversity; ecosystem

diversity; intact nutrient cycling; intact water cycling; and renewable energy processes.

- We recommend that the “polluter pays” principle apply to agriculture just like it does to other areas of economic activity. This principle will provide the impetus for agriculture to avoid costs due to polluting activities, and will thus manage their operations in an environmentally responsible way.

We recognize that small and medium sized family farm operations and cooperatives are least able to pay for the investment of capital and additional labour needed to implement beneficial management practices, environmental farm plans, and the transition to sustainable agriculture in order to provide ecological goods and services.

- We recommend that the “polluter pay” principle be suspended temporarily for these operations, and that appropriate, effective, fully-resourced support programs be implemented to assist these farms in their transition to more environmentally sound practices.