

Responsible Grain – Voluntary Code of Practice for Grain Farmers

Canola Consultation

What We Heard Report – March 2021

Submitted to the Canadian Roundtable for Sustainable Crops by Canadian Canola Growers Association

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1.0 Introduction

Consultations on a draft code of practice for grain farmers were held from December through February 2021. In total over 850 individuals participated in the consultation either through an open public consultation or through consultations organized by a commodity association or farm group. This report reflects the feedback and discussions from the consultation organized by canola groups including Alberta Canola, SaskCanola, Manitoba Canola Growers Association, Canadian Canola Growers Association and the Canola Council of Canada.

The above groups invited approximately 50 farmers from Ontario to B.C. that reflect the diversity of grain farms and farmers across Western Canada including age, gender, farm size and geography. These farmers participated in four virtual sessions - an introductory session, two discussion forums and a wrap up session - that collectively required more than six hours of their time. In addition, these farmers invested a significant amount of time in reviewing the draft code using the online workspace, ranking the different practices and logging thousands of comments.

The significant investment of time and the constructive feedback this group provided reflects their commitment to the industry and their desire to help shape the conversation around issues affecting their farms. Their time and feedback are invaluable and sincerely appreciated. This report summarizes the feedback and provides recommendations for next steps. The report and its findings will be presented to the Canadian Roundtable for Sustainable Crops, which acts as the steering committee for Responsible Grain.

2.0 What We Heard – Seven Key Issues for Action

Based on the feedback received from farmers in the canola consultation, it is clear there are significant concerns with this draft of the code and substantial changes are required in both approach and content. Below is a summary of the issues raised by farmers through the canola consultation.

2.1 Clarity of Purpose – The objective of the code or the ‘why’ is not clearly articulated

Many farmers questioned the purpose or the objective of the code. While three priorities were cited as those that the code would address, being public trust, market access and defense against government regulation, the draft presented did not show a clear link back to any of the three identified priorities. This left farmers with a sense of uncertainty and mistrust around how exactly the code would be used now and into the future and significantly eroded their confidence in the process and their support for the initiative. They could not identify what value it would have to their farm or the industry. Some farmers suggested that without this purpose being more compelling and clearer there was no reason to even have a code of practice.

For example, if the primary objective is public trust, they questioned how consumers would take such a detailed list of production practices and feel more confident about Canadian grown grain and practices used to grow it. If the purpose is to address market access issues, there was not a compelling case made that the draft document would help to open markets currently experiencing market access issues.

2.2 Tone of the document should align with purpose

There was a resounding message that the tone of the Code must change and that the tone needs to be aligned with the purpose of the Code. Overall, farmers commented that the general tone of the document came across as negative or accusatory to farmers. They questioned how “pointing out the negative things farmers might do,” will help build public trust. Farmers are proud of their achievements and efforts as they relate to environmental stewardship and want to see that communicated and positive stories based on sound facts that back up those stories.

We heard many comments that the Code should be a celebration of the great things that farmers have done and are doing. And then, the next step would be a path forward on continuous improvement and further steps that can be taken.

2.3 Too detailed and complex

The draft consists of 7 modules and nearly 200 practices. Going into this level of detail is not necessary. It is overwhelming for farmers and was perceived as too prescriptive and in some cases even out of date with technological advances. In addition, at times that level of detail creates challenges due to differences in practices between regions or technologies used. Comments that highlight this included, “some are turning to satellite or drone imagery and other precision ag measurements to replace soil testing”, and

“many are using pressure washing instead of triple-rinsing pesticide containers”.

2.4 Involvement of Ducks Unlimited (DU)

DU's involvement in drafting the code was a lightning rod issue for a group of farmers from areas of Manitoba and Saskatchewan. Based on the outcomes of past initiatives, trust between these farmers and DU has been broken leading them to view DU's involvement and influence with suspicion. Whether the influence is real or perceived, the involvement of DU undermines the credibility of the code with a significant group of farmers in Western Canada.

Questions were also raised as to why DU has four representatives involved in the code drafting process (two on the scientific committee, one on the communications committee and one on the code committee). Noting that no other organization has that many representatives.

2.5 Not all modules are viewed the same - Water and land modules are the most contentious

Arable land is a scarce resource and one of the largest capital assets for grain farms. Water interacts and impacts land in many ways and requires continuous management. To be sustainable, every farm needs to be able to manage their land and water in the best way for their individual situation keeping in mind both environmental and economic impacts. Given these considerations, it is extremely challenging to find practices that all Canadian grain farms can commit to, even at a high level. There is simply too much variability from farm to farm, region to region and year to year and farmers need flexibility to manage the variability that occurs on their farms.

Some farmers suggested including only provincial regulations as a means to address this variability and the sensitivity of the issue, noting that the sensitivity in this area could undermine support for the entire code.

2.6 Farmers need to lead

A farmers' code of practice should be led by farmers. Many perceived the initiative to be industry-led eroding their trust and buy-in.

2.7 Words Matter

Certain words were perceived as overly negative including:

Drainage. Farmers view "drainage" as a negative word that describes only one perspective on water management. They pointed out that there are many positive outcomes to managing water on their land and focusing only on 'drainage' does not allow for the positive aspects of water management to be included.

In addition, the singling out of drainage disproportionately impacts farmers without tile drainage, who suffer from excess moisture or those in specific geographic areas.

Requirements. There was concern over the word 'requirements' for several reasons including:

- 'it needs to be clear what is already in regulation, so consumers know what is already required from farmers.' Mixing current regulations with industry BMPs does not allow for that.
- 'Requirements can quickly become regulation'.
- Requirements in a voluntary code are confusing.

3.0 Recommendations

In addition to the key issues that are highlighted above, there are five additional key recommendations flowing out of the canola consultation that we present as additional feedback to the Canadian Roundtable for Sustainable Crops regarding next steps for Responsible Grain:

1. Publish a what we heard report that summarizes the consultation feedback and demonstrates how this feedback will be considered as well as the next steps that will be taken in the process.
2. Draft a white paper that assesses the intent or purpose of the code. The paper would analyze threats to the grain industry and the value of a code of practice in addressing these issues. This would provide clear and transparent direction on next steps based on the initiative's value to farmers and the grain industry. It is a critical step in providing a compass for this initiative setting both the tone and purpose of the Code rewrite.
3. Based on the conclusions and outcome from the white paper and the feedback from the first consultation, considerations for a second draft of the code should include:
 - a. the scope of the code.
 - b. the composition of the Code Committee and an assessment of whether it needs to be adjusted to meet the intended outcome and scope.
 - c. increased farmer involvement during the process of a rewrite, possibly through a farmer advisory committee.
 - d. the desired tone of the code.
 - e. whether the current branding of the code as Responsible Grain still fits and resonates with audiences based on the intended purpose.
4. Again, pending the findings of the white paper in terms of the needs of the sector, consider creating a document with three distinct layers. The first would outline current regulations that touch or direct grain production in Canada. Telling the story of how Canada's regulatory system provides the foundation for sustainable grain production could provide value on its own. A second layer would be the industry-led stewardship initiatives already developed such as 4Rs and CleanFarms. And, if required, the third layer would be a list of recommended best management practices that demonstrates farmers' commitment to sustainability and continuous improvement.
5. Consider the role of NGOs in adding credibility to a grain farmers code of practice and look for ways to achieve this that do not erode the credibility and saleability of the code to farmers.

4.0 Assessment of Feedback on Individual Modules and Practices

4.1 Nutrient Management

4.1.1 Practices to be removed

Based on the consultation feedback it is recommended that the following practices be removed from the Nutrient Management module. These practices received a high degree of disagreement with 49% or more of the respondents disagreeing that the practice should be included.

Practice	Comments
<i>Required Practice 10:</i> Keep records of soil test analytical results for a minimum of 5 years for each field (i.e. per crop management unit, lot number, legal land description).	Better as a recommendation. An unrealistic expectation to keep records for 5 years.
<i>Recommended Practice D:</i> Test soil for each field using a representative sample at least every 3 years.	Broad disagreement related to the need to soil test every 3 years, as well as vagueness of the statement.
<i>Recommended Practice F:</i> Calculate a nutrient balance for each field, recording the amount of all nutrients applied and the amounts estimated to be removed in crop harvest.	Broad disagreement related to regulatory creep, unnecessary paperwork, and ability to implement at the field level.
<i>Recommended Practice J:</i> Refer to weather forecasts to ensure the amount of precipitation forecast for the next 12 hours is unlikely to generate runoff or volatilization, before surface broadcast applications of nutrients (N, P).	Broad disagreement on having in the code due to the fact that farmers regularly check the weather.
<i>Recommended Practice Q:</i> Keep records of all nutrients applied to and removed from each field, calculating a nutrient balance.	Broad disagreement related to the lack of rationale for the practice, the standardisation for the practice, as well as ability to implement at the field level.
<i>Recommended Practice R:</i> Annually assess performance of the chosen source-rate-time-place combinations for nutrient application in meeting the farm's sustainability goals.	Disagreement due to vagueness of the practice, its high-level nature, and the relevance.

4.1.2 Practices that require editing

Within the nutrient module, there were several required practices that, if edited properly, could be acceptable by farmers. The following required practices had agreement of 70% of the respondents or more, and at least 31% of farmers flagged these practices as being in need of editing.

Practice	Comments
<i>Required Practice 3:</i> Where required by law, perform representative soil sampling as per provincial requirements; otherwise, complete a representative soil test (per field) at least every 5 years.	Comments reflected that testing every 5 years is not appropriate, and that soil variability makes sometimes makes this a futile exercise.
<i>Required Practice 5:</i> Where required by law, comply with regulations on timing of nutrient application. Otherwise, do not apply any nutrient sources on soils that are frozen, snow-covered or saturated with water.	Need to account for different types of nutrients and their specifics, application technology, and definitions.
<i>Required Practice 6:</i> Use necessary precautions, including providing training and using personal protective equipment (PPE), to ensure operator and bystander safety when handling and transporting mineral and biological fertilizer.	Should remove “bystander”. Recognize that this is likely only an issue for NH3. Move to health and wellness.
<i>Required Practice 9:</i> Keep records of all nutrient applications (including source, rate, timing and placement) for each field.	Most farmers already do this. Better as a recommendation not a requirement. It presents a risk of becoming regulatory.

4.1.3 Practices in need of editing and further consideration:

Within the nutrient model there is a further subset of required practices that should be rewritten. It should be noted that editing these practices will not necessarily achieve a level of agreement that is supportable for further consultation. These required practices were disagreed with by nearly one-third of respondents and at least one-quarter felt that they needed editing.

It is recommended that these practices be further discussed by the Code Committee for consideration as to whether or not there is sufficient support for them to be included in a second iteration of the Nutrient Management module.

Practice	Comments
<i>Required Practice 4:</i> Establish nutrient application rates, whether mineral fertilizer, livestock manure and other biological fertilizers, based on	The required practice is overly complicated. It presents a risk of becoming regulated in its current approach. Fertilizer costs mean that all

crop nutrient needs to achieve yield targets, with additional consideration given to soil nutrient availability, application equipment and environmental conditions.	farmers establish nutrient application rates based on these considerations. Better as a recommended practice.
<i>Required Practice 7:</i> Adhere to established nutrient application buffer zones between cropland and environmentally sensitive and biodiverse areas (e.g. water bodies, water sources and other crops).	Wording is too vague. Environmentally sensitive, buffer zones, biodiverse areas, water bodies, vary by region and farm and are not defined. Does not recognize field-level realities.
<i>Required Practice 8:</i> Store mineral fertilizers (liquid and/or granular) in a designated area on an impermeable surface (dry fertilizers) or secondary containment area (liquid fertilizers).	Wording is too open to interpretation/too vague. Practice could result in costly retrofits which are out of step with provincial regulations. Provincial regulations should be followed.

4.2 Pest and Pesticides

4.2.1 Practices to be removed

It is recommended that the following recommended practices be removed from the Pest and Pesticides module. Forty percent or more of all respondents disagreed with these practices being included.

Practice	Comments
<i>Recommended Practice A:</i> Prepare a plan for integrated pest management (IPM) that employs different aspects of pest control, including mechanical, biological, chemical, pest resistance, cultural measures, field scouting, and use of predictive models (41% disagreement).	Unrealistic to have an IPM strategy for each pest. Statement is too ambitious. Each aspect of recommended practice has its own limitations, some too limited (ie, mechanical is restrained by carbon tax, predictive models don't exist for every pest).
<i>Recommended Practice D:</i> Minimize the spread of pests by cleaning and sanitizing equipment between fields and by inspecting and monitoring on-farm grain storage bins (67% disagreement).	Cleaning and sanitizing equipment between fields is not reasonable, except very specific, very high-risk situations. Furthermore, the second part of the recommendation is unclear and therefore unworkable.
<i>Recommended Practice P:</i> Store pesticides in a separate locked building designated for that purpose (93% disagreement).	Economic considerations mean that a separate locked (heated throughout the winter) building designated for the purpose of storing pesticides is not available to the majority of producers.

4.2.2 Practices that require editing

Within the pest and pesticides module, there were several required practices that, if edited properly,

could be supported by farmers. The following required practices were flagged by at least 32% of producers as requiring changes:

Practice	Comments
<i>Required Practice 1:</i> Accurately assess weed, disease and insect pressures to determine crop injury levels, impact on beneficial insects and economic thresholds for using pesticides (42% needs editing).	Some pesticides are applied prophylactically or based on historic context, some pests move too fast, using thresholds is too subjective and not realistic.
<i>Required Practice 2:</i> Establish a crop rotation that reduces diseases and pest pressure, and the development of resistant pests.	Crop rotation should be a recommendation, not a requirement. There are too many factors (economic, agronomic, regional) at play to have this in place. Also, incredibly vague requirement. Would recommend “cropping system”.
<i>Required Practice 3:</i> Where required by law, ensure that all pesticide applicators receive appropriate training and are certified or licensed.	Applicator training is not required in all provinces. Consider removing “where required by law” and/or “and are certified or licensed”.
<i>Required Practice 4:</i> Apply only Canadian registered pesticides adhering to label requirements (i.e. application rates, crop staging, preharvest and re-entry intervals).	Should include situations considering minor-use and emergency-use authorizations.
<i>Required Practice 6:</i> Rotate chemical groups and modes of action to prevent and delay the development of pest resistance in accordance with the product label and agronomic guidance.	Should be a recommendation. Product combinations, current market dynamics, and field-level realities do not always allow for chemical and modes of action rotations.
<i>Required Practice 8:</i> Protect non-target areas (e.g. water bodies, water sources, other crops and protected areas) beyond the field boundary using buffer zones according to the product label and legal requirements.	Wording is too vague. Water bodies and water sources vary by region and farm and are not defined. Buffer zone is not defined. Does not recognize field-level realities. Better as a recommendation.
<i>Required Practice 9:</i> Follow product label restrictions on weather conditions including wind, precipitation and air temperature.	Wording is too vague. Does not recognize field-level realities, advancements in sprayer technology. Better as a recommendation. Should include “whenever possible”.
<i>Required Practice 10:</i> Calibrate pesticide application equipment in accordance with manufacturer specifications and at a minimum seasonally.	Best as a recommendation. Producers calibrate their equipment and regularly verify its accuracy. Field calibration is more than sufficient.
<i>Required Practice 11:</i> Do not fill sprayer near a well or watercourse of any kind.	Too vague. Near, and watercourse are not defined. Waterways or wells are sometimes used to fill sprayers. Could result in requiring all farms to have a water truck.
<i>Required Practice 14:</i> Use applicable Personal Protective Equipment (PPE) to ensure operator and bystander safety when handling, transporting	Too vague. Bystander is not defined and should be removed. Try “... to ensure safety, based on manufacturer recommendations”.

and applying pesticides, based on manufacturer recommendations.	
<i>Required Practice 18:</i> Triple rinse applicable pesticide containers and pesticide application equipment in a designated area away from a well, watercourse, environmentally sensitive area, grain and feed.	Too vague. Away from, watercourse, are not defined. Not reflective of pressure rinsing, which is common practice.
<i>Required Practice 22:</i> Keep records of all pesticide purchases and applications for 5 years.	Should read “applied” not purchased. 5 years is too long. 2-3 is more realistic.

4.3 Soil Management

4.3.1 Practices to be removed

Based on the consultation feedback, it is recommended that these practices be removed from the Soil Management module. The required practice that producers disagreed with related to the soil management module was disagreed with by 43% of farmers surveyed.

Practice	Comments
<i>Requirement 4:</i> Minimize field operations when fields are susceptible to severe compaction.	Does not take into account field-level realities. Should be a recommendation.

The following recommended practices were disagreed with by 44% of farmers, or more, in the canola consultation. No farmers surveyed indicated a wording change would be warranted.

Practice	Comments
<i>Recommended Practice D:</i> Minimize travel speed of field operations that disturb the soil.	Does not reflect equipment design or manufacturers recommendations.
<i>Recommended Practice G:</i> Adopt measures to limit soil compaction. Use proper wheel pressure and axle load and/or controlled traffic patterns. Check soil moisture content before beginning field operations.	Not reflective of field-level realities. Could be possibly re-presented if kept to first sentence only.
<i>Recommended Practice H:</i> Grow saline tolerant crops or perennial vegetation in discharge and recharge areas.	Unrealistic. Does not actually address reasons for salinity or unmanageable water flows in discharge and recharge areas. Growing saline tolerant crops does not matter if you don’t have high salinity soils.
<i>Recommended Practice I:</i> Do not burn crop residue.	Important tool of last resort that must be maintained. Very important tool that must remain available when growing flax.

4.3.2 Practices that require editing

Within the soil management module, there were several required practices that, if edited properly, could be supported by farmers. The following *required practices* were flagged by at least 49% of farmers as requiring wording changes.

Practice	Comments
<i>Required Practice 1:</i> Minimize tillage frequency and intensity (e.g. depth, speed).	Too prescriptive. Better if changed to: "Use no-till and conservation tillage practices whenever possible and appropriate given crops grown and soil type."
<i>Required Practice 2:</i> Establish a crop rotation that improves soil health.	Crop rotation has purposes beyond soil health. Consider: "Develop cropping systems that work towards soil health/soil quality goals of the farming operation." Better as a recommendation.
<i>Required Practice 5:</i> Avoid burning crop residue by using other residue management practices.	Better as a recommendation. Important tool of last resort that must be maintained.

4.4 Water Management

4.4.1 Practices to be removed

It is recommended that these practices be removed from the Water Management Module. The practices that producers disagreed with related to the water management module were disagreed with by at least 41% of farmers.

Practice	Comments
<i>Requirement 10:</i> When installing a drainage system, ensure that it is properly designed for the specific soil conditions of the farm, including checking with a specialist (e.g. engineer) to make sure the system is appropriate.	This is not appropriate for every kind of drainage system. Is not applicable to surface drainage.
<i>Required Practice 12:</i> Take adequate measures to avoid all forms of contaminants (e.g. nutrient sources, pesticide) from entering the drainage system.	Too vague, ie adequate measures, avoid, all forms, contaminants, drainage system. All contaminants is not possible.
<i>Recommended Practice A:</i> Establish and manage buffer zones (e.g. woodland, prairie or tame forage) or vegetative areas around natural and man-made water bodies.	Too vague, ie buffer zones, vegetative areas, water bodies, not defined. All vary by farm and region. Not practical to manage every buffer on-farm. Cannot be supported due to regulatory creep.

<i>Recommended Practice D:</i> Use windbreaks to reduce water requirements across the field.	Windbreaks are no longer considered a best practice for farms in Western Canada. Take up too much water, reduce operating efficiencies.
<i>Recommended Practice E:</i> Leave stubble on fields to conserve water.	Too vague. Moisture needs vary by field. Could change to “where appropriate”.
<i>Recommended Practice F:</i> Incorporate compost or other organic matter into soil to increase water availability for plants.	Too vague. Incorporate implies tillage. Previous modules have discouraged this. What is organic matter/compost? What source? How does tilling increase water availability for plants?
<i>Recommended Practice G:</i> Develop a cropping strategy that takes into account the risk of water deficits and drought (e.g. choose crop varieties that are more resistant to drought, use cover crops, fall-seeded crops).	Water deficits and drought are a regionally specific problem. Too much water can be as much of a problem. Recommendation is not applicable across Canada. Should be struck.
<i>Recommended Practice K:</i> Ensure the design and installation of the drainage system is conducted by trained individuals.	Not appropriate to require trained individuals. Provincial drainage regulations are sufficient.
<i>Recommended Practice L:</i> Install permanent drop structures in ditches to allow water to flow gently without causing erosion.	The problem associated with the recommended practice is not a problem in all areas. Also, depends on the ditch. Statement is too broad.
<i>Recommended Practice P:</i> Install sediment traps in ditches at key points to retain sediment.	Too vague re: key points. Too broad. Refer to municipal regulations. Ditches are a municipal responsibility.
<i>Recommended Practice Q:</i> Consult best professional advice to calculate contributing area to design and manage for peak flows (when most sediment is exported).	Peak flows of a certain severity are not manageable with any kind of advice. Out of touch.
<i>Recommended Practice R:</i> Leave or plant a vegetative strip along the watercourse to filter contaminants before reaching the drainage system.	Too vague, re vegetative filter strip, watercourse, not defined. All vary by farm and region. Not practical to plant (then manage) every VS on-farm.
<i>Recommended Practice S:</i> Consider adding a treatment / constructed wetland at the field edge /drainage ditch interface to trap sediment by slowing down the water velocity.	Specificity of Recommendation S demonstrates specific interests at play in drafting the Water Module. Calls the module in to question. Perceived efficacy of this practice varies greatly by farm and region – if the module is meant to apply to all of Canada, these sorts of obviously regionally specific practices need to be struck.
<i>Recommended Practice T:</i> Monitor the water quality in drainage system outlets on a regular basis.	Water quality is a provincial jurisdiction. Asking farmers to monitor it is ridiculous. How are they supposed to monitor it? What is Responsible Grain’s approved water collection protocol? Can they recommend a lab? Who will pay for the water quality monitoring?

4.4.2 Practices that require editing

Within the Water Management Module, there were several required practices that, if edited properly, could be supported by farmers. The following *required practices* were flagged by at least 35% of farmers as needing changes.

Practice	Comments
<i>Required Practice 2:</i> Where regulated maintain permanent vegetative buffer zones (e.g. grass, trees, and/or shrubs) of prescribed size around watercourses and natural and man-made water bodies (i.e. dugouts and municipal drains).	Too vague re vegetative buffer zone, prescribed size, watercourse, water bodies. Subject to multiple interpretations.
<i>Required Practice 9:</i> If required by regulation, obtain permits and licences for drainage projects and ensure any additional authorizations are obtained before beginning or undertaking maintenance of cropland drainage projects.	Should only say follow applicable laws related to water management.

4.5 Seed Selection and Use

4.5.1 Practices to be removed

It is recommended that this practice be removed from the Seed Selection and Use. Forty-six percent of farmers disagreed with this practice.

Practice	Comments
<i>Recommended Practice C:</i> Use seed with high varietal purity, such as certified seed, to ensure the integrity of the variety planted and that other varieties and off-types are minimized.	Duplicative of RP B. Certified seed is not the only manner in which to ensure varietal purity.

4.5.2 Practices that require editing

Within the Seed Selection and Use Module, there were required practices that, if edited properly, could be supported by farmers. The following *required practices* were flagged by at least 29% of farmers as needing changes.

Practice	Comments
<i>Required Practice 1:</i> For those crops that are subject to variety registration, whether the seed is certified, common or farm-saved: Only use varieties that have been approved for use in Canada through the Variety Registration system;	Too vague. Comments reflected that non-registered varieties can be sold for feed or non-commercial/non-export purposes.

Do not use varieties which have been de-registered, or registrations have been cancelled.	
<i>Required Practice 5:</i> Maintain seed treatment equipment in accordance with manufacturer specifications.	Better as a recommended practice. Very little on-farm seed treatment taking place. Would suggest changing to “Regularly maintain seed treatment equipment”.

4.6 Land Use and Wildlife

4.6.1 Practices to be removed

Based on the consultation feedback these practices should be removed from the Land Use and Wildlife Module. These practices were disagreed with by at least 56% of farmers.

Practice	Comments
<i>Required Practice 1:</i> Identify actual and potential habitats on the farm that support biodiversity and are beneficial to wildlife.	No substantiated rationale for this practice. Identifying actual and potential habitat is not a skill set of some farmers. There is a cost to providing these environmental services on private land, which public seems to think is important. If the public thinks it is so important, why are they not willing to pay for it? Concern this will lead to legislated/regulated requirements to provide habitat. Better off as a recommendation, at best.
<i>Required Practice 5:</i> Avoid conversion of existing forests, wetlands and native grasslands into annual crop land. If converting, implement practices to assist in maintaining biodiversity.	Too vague re: forest, wetland, native grasslands (size, type, composition), practices, maintain, biodiversity. Existing provincial legislation and regulations address the multiple issues contained in this incredibly broad statement. There is a cost to providing these environmental services on private land, which public seems to think is important. If the public thinks it is so important, why are they not willing to pay for it?
<i>Recommended Practice A:</i> Identify opportunities to connect natural areas on the land through undeveloped field margins and fence lines, shelterbelts, sloughs, ponds and riparian areas.	What is the purpose, outcome or benefit of this practice?
<i>Recommended Practice B:</i> Incorporate fall-seeded crops in crop rotations to reduce spring disturbance of ground nesting birds.	Not applicable/possible in many areas due to weather and soil conditions, and production systems.
<i>Recommended Practice C:</i> Create and maintain areas with a variety of flowering plants that provide food and nesting space for pollinators and other beneficial insects (e.g. a prairie	Not realistic to ask farmers to be gardeners as well as food producers. Many crops already provide phenomenal pollinator and beneficial insect habitat and food, ie canola, flax, peas. The

<p>meadow, a flowering cover crop, a flowering crop in rotation, or an area of flowering plants cultivated specifically for beneficial insects).</p>	<p>2,000 beneficial insects that call the canola canopy and adjacent areas home, for example, should be celebrated – not diminished with practices like this.</p>
<p><i>Recommended Practice E:</i> Establish and maintain riparian areas around bodies of water as per established best management practices.</p>	<p>Riparian areas and bodies of water need to be clearly defined. Most permanent and semi permanent bodies of water already have established and maintained riparian areas. Practice should not be in land use – it is already in water section. Duplicative nature of Code focusing on specific issues over and over leads some readers to conclude Code is not really about responsible grain.</p>
<p><i>Recommended Practice F:</i> Do not convert existing forests, wetlands and native grasslands into annual crop land (92% disagreement).</p>	<p>There is a cost to providing these environmental services on private land, which public seems to think is important. If the public thinks it is so important, why are they not willing to pay for it? Are there any permissible acreages of these topographic features being brought into production? “Wow”. “Pardon me”. “Not even maybe”. Duplicative nature of Code focusing on specific issues over and over leads some readers to conclude Code is not really about responsible grain.</p>
<p><i>Recommended Practice G:</i> Avoid converting semi-natural areas (e.g., field margins, hedgerows, windbreaks, shelterbelts, woodlots, bluffs, patches of trees) to annual cropland (97% disagreement).</p>	<p>Planting to and through field margins, hedgerows, shelterbelts, woodlots, and trees reduces fertilizer, seed, chemical and fuel inputs, and reduces a farms overall carbon footprint. Field efficiency is part of sustainability. Duplicative nature of Code focusing on specific issues over and over leads some readers to conclude Code is not really about grain.</p>
<p><i>Recommended Practice H:</i> Take economically marginal land out of annual crop production (e.g. convert to perennial grass or engage a qualified professional in wetland restoration or reforestation, where appropriate).</p>	<p>There is a cost to providing these environmental services on private land, which public seems to think is important. If the public thinks it is so important, why are they not willing to pay for it? Duplicative nature of Code focusing on specific issues over and over leads some readers to conclude Code is not really about grain. "Consider using economically marginal land for a better suited purpose which may include perennial grass".</p>

4.6.2 Practices that require editing

It is recommended that these practices be edited and re-presented in a second iteration of the Land Use and Wildlife Module for further consultation.

Within the Land use and Wildlife Module there were required practices that, if edited properly, could be adoptable by farmers. The following *required practices* were flagged by at least 27% of farmers as needing wording changes.

Practice	Comment
<i>Required Practice 2:</i> Investigate and comply with federal, provincial and municipal regulations before conducting any agricultural activity (e.g. removing or altering plants, disturbing soils, drainage) in a riparian area.	Definition of riparian area is too broad, and should not include ephemeral water areas. Producers should comply with federal, provincial and municipal regulations, why are riparian areas being singled out? If this deals with water, it should be in the water module. Duplicative nature of Code focusing on specific issues over and over leads some readers to conclude Code is not really about grain.
<i>Required Practice 4:</i> Where required by law, obtain the permits, licences or agreements to conduct work in or next to protected areas. If no permit is required, ensure any additional authorizations are obtained before beginning or undertaking work in or next to protected areas.	Too vague, re: next to. Strike second sentence. It adds to confusion and gives the impression that farmers are careless.

4.7 Health and Wellness

Several requirements and recommendations confuse, to varying degrees, provincial employment standards legislation. In order to ensure that farmers are not misinformed of their rights and obligations under provincial employment standards legislation, it must be stated that that legislation must be followed before any considerations provided for in the Code of Practice.

4.7.1 Practices to be removed

It is recommended that these practices be removed from the Health and Wellness Module. These practices were disagreed with by at least 44% of farmers.

Practice	Comments
<i>Required Practice 11:</i> Make sure employees can decline when asked to work overtime.	Employees are allowed to decline to work overtime. This statement makes it seem like farmers don't allow that. Would be best to see practices that are in conflict with, or misconstruing provincial labour laws, struck.
<i>Recommended Practice J:</i> Limit work hours to 48 hours per week during the low season and to 72 hours per week during the peak season, unless a higher amount has been accepted by employees.	Not a practical consideration during harvest. Furthermore, provincial employment standards outline consistent (required) considerations that differ from this. To reduce confusion and ensure that employers and employees are following the

	law and understand their respective rights and obligations, this recommendation should be struck.
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4.7.2 Practices that require editing

Within the Health and Wellness Module there were required practices that, if edited properly, could be adoptable by farmers. The following *required practices* were flagged by at least 32% of producers as needing wording changes.

Practice	Comments
<i>Required Practice 2:</i> Ensure that everyone visiting the farm (e.g. sales representatives, service providers and contractors) are aware and understand the health and safety risks associated with their presence on the farm.	Change to “ensure everyone invited to the farm for business purposes are aware and understand any extraordinary hazards related to their business on the farm.”
<i>Required Practice 6:</i> Ensure the use of PPE is enforced.	Change to “Provide and encourage the use of PPE, in consideration of legislated health and safety requirements.”
<i>Required Practice 10:</i> Schedule regular breaks during peak periods (e.g. seeding, harvest) to reduce fatigue.	Change to “Allow for regular breaks as outlined in provincial employment standards legislation”. To reduce confusion and ensure that employers and employees are following the law and understand their respective rights and obligations, this recommendation must be clear.
<i>Required Practice 14:</i> Develop and issue general farm rules, procedures and expectations that everybody can understand (could include a job description, a contract or an employee manual)	This practice would be best as a recommended practice. Smaller farms with casual, seasonal, part time employees do not have the resources to develop this kind of description, contract, or employee manual due to the constantly changing nature of the work and its associated demands. Furthermore, employee manuals/handbooks are only required for employers with a specific number of employees. Many farms would not meet this threshold.