



July 30, 2024

Honourable Lawrence MacAulay
Minister of Agriculture and Agri-Food Canada
1341 Baseline Road
Ottawa, ON
K1A 0C5

Sent via email: aafc.minister-ministre.aac@agr.gc.ca

Dear Minister MacAulay,

Re: *AgriInvest Environmental Cross-Compliance*

On behalf of the Beef Farmers of Ontario (BFO) and our 19,000 members, we write to you today regarding the proposed change to AgriInvest that would require farm operations with annual Allowable Net Sales (ANS) in excess of \$1 million dollars to complete an agri-environmental risk assessment.

In general, BFO does not support policies that discriminate or place additional burden on larger operations simply because of their size and the fact that they have successfully achieved economies of scale. This is one of the reasons groups like BFO and our national partners at the Canadian Cattle Association (CCA) and the National Cattle Feeders' Association (NCFA) have advocated for the removal, or at a minimum, the increase in the operational cap under AgriStability from \$3 million to \$15 million. Farm operations of larger scale should be entitled to the same support as any other farm operation in the program.

Notwithstanding our concerns regarding separate treatment within BRM programming and other support programs based on farm size, we remain concerned that the commitment to require farm operations with ANS in excess of \$1 million dollars to complete an agri-environmental risk assessment to be eligible for AgriInvest has not been followed with a publicly available list of programs that may satisfy this requirement.

The change to AgriInvest was announced more than two years ago for implementation during the 2025 AgriInvest program year, which is quickly approaching. As such, BFO strongly recommends that should this rule proceed to implementation, that Agriculture and Agri-Food Canada (AAFC) communicate the list of eligible programs to industry as soon as possible to allow farm operations to plan and prepare for the new requirement.

Similarly, while we have heard repeatedly that the Environmental Farm Plan (EFP) is being positioned as the primary compliance vehicle for this requirement, it is unclear what factors will need to be satisfied to ensure farm operations are in compliance. Many farms have maintained

EFPs in the past but may not be current with the latest program iteration. More importantly, if the intent of this requirement is to demonstrate that larger operations are employing environmental best practices then additional programs should be included beyond the EFP.

With respect to the previous point, BFO would appreciate confirmation from AAFC as soon as practically possible that **Verified Beef Production Plus (VBP+)**, and the **Ontario Corn Fed Beef Quality Assurance Program (OCFBQA)** will satisfy the environmental risk-assessment requirement prior to the AgriInvest 2025 program year.

Both VBP+ and OCFBQA programs serve as certifying bodies for the **Canadian Roundtable for Sustainable Beef** and the Certified Sustainable Beef program. Environmental stewardship and best practices are prominent components of both programs, which are fully audited by outside parties, and should therefore satisfy the new AgriInvest requirement.

Ultimately, beef farmers are committed to raising animals responsibly, conserving and enhancing the natural ecosystem, and embracing innovations that foster continual improvement. Enrollment in programs like VBP+ and OCFBQA help demonstrate that commitment.

Thank you for consideration of our comments.

Sincerely,



Craig McLaughlin
BFO President

cc: Minister Rob Flack, Ontario Ministry of Agriculture, Food and Agribusiness
Canadian Cattle Association
National Cattle Feeders' Association
Francesco Del Bianco, Agriculture and Agri-Food Canada