

# *Environmental Law Centre*

December 22, 2000

Our File: 33

Agriculture and Agri-Food Canada  
Strategic Policy Branch  
Ottawa, Ontario  
K1A 0C5

Attention: Michael Presley [via e-mail: jaroudis@em.agr.ca]

Dear Mr. Presley:

**RE: Agriculture and Agri-Food Canada Sustainable Development Strategy  
2000-2003**

The Environmental Law Centre is a non-profit organization that has operated in Alberta since 1982. The Environmental Law Centre provides services in environmental law education and assistance, environmental law reform and environmental law research to achieve its objective of making the law work to protect the environment.

Accordingly, we have prepared comments on the draft Agriculture and Agri-Food Canada's Sustainable Development Strategy (the "Strategy").

## **General Comments**

Generally, we were pleased to see sections of the Strategy that discussed the health impacts and off-farm environmental impacts associated with agriculture in Canada. However, as will be discussed later in our comments, there are some aspects of these impacts that still need to be addressed in the Strategy.

We are concerned that the Strategy, as a whole, subordinates the concepts of biodiversity and sustainability to the concepts of growth and biotechnology. It is our position that this is not the correct approach. The Strategy should be designed to ensure that the needs of the present are met without compromising the ability of future generations to meet their own

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needs. This cannot be achieved without placing the emphasis on biodiversity and sustainability.

We are also concerned that there is no discussion of potential cooperation between Agriculture and Agri-Food Canada and other federal departments.

In particular, we would like to see discussion about the potential for cooperation with Health Canada and Environment Canada. Many issues - for example, biotechnology - raise concerns that fall into the mandate of several federal departments. Hence, cooperation between these departments to achieve a consistent, coordinated approach to sustainable development is essential. We also recommend that the potential for cooperation with other governments be discussed in the Strategy.

Finally, we are concerned that the Strategy makes no mention of the precautionary principle. The precautionary principle requires that where there is a potential for adverse environmental effects associated with a particular process, all steps to prevent the potential adverse environmental effects shall be taken even if there is scientific uncertainty as to those effects. The precautionary principle is a key element of sustainable development. Thus, it is our recommendation that the Strategy should expressly adopt and implement this principle.

## **Chapter 2: Our New Strategy for Sustainable Development**

We commend the commitment to science and technology that is evident in Chapter 2 of the Strategy. However, we recommend that the Strategy make a clear commitment to innovation. That is, mere improvement of existing agricultural techniques - such as pesticide use and irrigation - is not enough. There must be innovation that allows movement away from these existing agricultural techniques. As well, it is important that traditional knowledge (for example, heritage seeds) not be overlooked as a valuable source of information.

## **Chapter 3: Environmental Health of Our Agricultural Landscape**

With respect to the objective *Improving the Health of Our Water*, it is our

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recommendation that the Strategy include a commitment to reducing dependency on irrigation. That is, mere improvement of irrigation techniques is not sufficient. Innovation is required to eliminate the dependency on irrigation wherever possible.

With respect to the objective *Biodiversity*, it is our recommendation that the Strategy demonstrate a clear commitment to preserving habitat on agricultural lands. Preservation of habitat can help address many of the environmental impacts associated with agriculture including loss of biodiversity. The Strategy should discuss the programs and incentives that will be used to preserve habitat on agricultural lands. In addition, the Strategy should discuss the potential for cooperation between Agriculture and Agri-Food Canada and Environment Canada on this issue.

Secondly, at several points in the Strategy (see for example, pages 9 and 29), the comment is made that biotechnology is a means to improve and protect biodiversity. We question the value of biotechnology as a means to improve and protect biodiversity. There is growing concern that biotechnology may actually be a threat to biodiversity. For example, there is evidence that wildlife and non-biotech crops can be contaminated by the wind spreading genetically modified organisms\_ seeds or pollen. As such, concerns have been raised about the effects of biotechnology on wildlife and on the proper functioning of ecosystems (on which all living organisms, including humans, are dependent).

Thirdly, we are concerned that methods to improve biodiversity - such as, organic farming and the use of heritage seeds - are not extensively discussed in the Strategy. These methods have great value as a means of protecting biodiversity, as well as, air and water quality. As such, it is our recommendation that the Strategy clearly acknowledge the value of these methods. As well, we recommend that a commitment to encourage these methods be made in the Strategy.

## **Chapter 5: Consumer Needs are Met in a Way that Respects the Environment**

We recommend that some additional issues be addressed in Chapter 5 of the Strategy. Firstly, with respect to the objective *Risk Reduction in Pest Management*, we recommend

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that the Strategy discuss updating existing pesticide legislation. Canada's existing pesticide legislation has not undergone a substantial review since its initial introduction. Such a review is necessary to update the legislation to address current concerns with pesticides, for example to improve pesticide registration in Canada.

Secondly, the use of biotechnology is discussed under the objective *Risk Reduction in Pest Management*. It is our recommendation that Agriculture and Agri-Food Canada clearly position itself as a neutral regulator of biotechnology. It should not be an active developer and promoter of biotechnology. Rather, Agriculture and Agri-Food Canada should establish a regulatory system to assess the safety of biotechnology in an objective, scientific manner. Biotechnology is a relatively new concern and, to appropriately assess this new concern, Agriculture and Agri-Food Canada should revisit its current system for regulating the use and distribution of biotechnology. It is our recommendation that a clear commitment to revisit and revise the current regulatory regime for biotechnology should be stated in the Strategy. As well, there should be a commitment to consider a system of mandatory labeling of food and other products using biotechnology.

Thirdly, it is our recommendation that the targets under the objective *Risk Reduction in Pest Management* include an express commitment to reduce the dependency on chemicals in agriculture.

With respect to the objective *The Agriculture and Agri-Food Sector is a Good Neighbour for Canadians*, we recommend that the Strategy consider developing national standards for intensive livestock operations. The environmental and social impacts of intensive livestock operations are a growing concern throughout Canada. It is our recommendation that Agriculture and Agri-Food Canada demonstrate clear leadership in addressing these concerns.

## **Chapter 7: Measuring our Performance**

For the Strategy to be effective, it is essential that clear and measurable targets are set out in this document. The targets must be clear and specific. That is, a particular goal, rather than general objectives, must be set as targets. As well, the targets must be clearly measurable. Finally, there must be methods set out to measure performance and to evaluate success of the targets as a means for achieving sustainable development.

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## **Conclusion**

On behalf of the Environmental Law Centre, I thank you for considering our comments on the draft Agriculture and Agri-Food Canada's Sustainable Development Strategy. Please feel free to contact me at (780) 424-5099 if you have any questions regarding our comments.

Sincerely,

Brenda Heelan Powell  
Staff Counsel

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