



**FERTILIZER CANADA**

**FERTILISANTS CANADA**

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Environment and Climate Change Canada  
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RE: Toward the Creation of a Canada Water Agency - Discussion Paper

Fertilizer Canada welcomes the opportunity to respond to the most recent discussion paper *Toward the Creation of a Canada Water Agency*. Fertilizer Canada has responded to the consultation survey but would like to take the opportunity to highlight our positions and industry-led initiatives as it relates to the proposed goals and objectives of the Canada Water Agency.

Fertilizer Canada represents manufacturers, wholesale and retail distributors of nitrogen, phosphate, potash and sulphur fertilizers – the backbone of Canada’s agri-food economy. Responsible for half of the world’s current food production, fertilizer is fundamental to the future of agriculture and farmers’ ability to feed a growing global population. As the world seeks to sustainably grow food from a decreasing land base, farmers will rely on fertilizer to increase production efficiency while conserving our soil, water, and air. To meet the challenge, farmers will require more than just new and innovative technologies; they will require a framework for understanding and implementing the core principles and practices of sustainable agriculture.

4R Nutrient Stewardship has been designed for this purpose. For more than a decade, Fertilizer Canada has worked with Canadian farmers and the fertilizer industry to promote 4R Nutrient Stewardship - a science-based approach to fertilizer management that involves applying the Right Source @ Right Rate, Right Time, Right Place<sup>®</sup>. Use of the 4Rs optimizes plant nutrient uptake, maximizes yield and increases profitability, while also minimizing fertilizer runoff, leaching and nitrous oxide emissions.

Implementing 4R Nutrient Stewardship best management practices (BMPs) plays a key role in improving water quality across Canada. 4R Nutrient Stewardship Research has demonstrated the following benefits for water quality in Canada.

- In a Saskatchewan cereal-oilseed-pulse rotation, using in-soil placement to apply phosphorus fertilizer at appropriate rates, growers can significantly lower phosphorus runoff (as much as 75%) into surface and subsurface water bodies.
- In Prince Edward Island, applying 4R BMPs in potato production can reduce nitrate leaching into the soil by as much as 32%.



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- In Ontario corn production, implementing 4R BMPs of subsurface banding of phosphorus fertilizer as opposed to broadcasting enables growers to reduce runoff up to 60%.

Fertilizer Canada is proud of our provincial partnerships in Manitoba, Saskatchewan, Prince Edward Island, Quebec and Ontario. Our industry continues to work collaboratively with provincial governments, grower organizations and conservation groups to promote increased awareness and adoption of 4R Nutrient Stewardship. Recently, through our voluntary 4R programs, Fertilizer Canada has verified 3.8 million acres across Canada – showcasing our industry’s commitment to sustainable nutrient management and environmental stewardship.

4R Nutrient Stewardship is seen as an international standard for nutrient management and is referenced in the following provincial environment plans:

- The Canada-Ontario Lake Erie Action Plan references 4R Nutrient Stewardship as the recommended approach when developing watershed management plans in order to achieve meaningful nutrient load reductions in Lake Erie;
- The Manitoba Climate and Green Plan notes 4R Nutrient Stewardship as a method to reduce nutrient loading; and
- The Prairie Resilience Plan references 4R Nutrient Stewardship as a way to enhance fertilizer efficiency and has set a target of having 25% of Saskatchewan cropland acres under 4R Designation by 2025.

**Fertilizer Canada believes there is an opportunity for the Canada Water Agency to support and align with these provincial environment plans. We ask that the Government of Canada recognize 4R Nutrient Stewardship as the standard for sustainable nutrient management and its role in helping Canada reach its environmental and economic goals.**

Canada’s fertilizer industry believes that voluntary, industry-led initiatives are the best approach towards reducing nutrient runoff and environmental impacts. Our Fertilizer Use Survey showed that cost was the number one barrier to adoption of 4R practices. We believe that incentives could help offset the cost of soil testing, variable rate technologies or new equipment and would encourage the continued uptake of 4R practices in Canada. The discussion paper notes that there is a possible opportunity for the Canada Water Agency to ensure Canadian farmers have access to necessary information on freshwater management decisions through improved coordination of science-related information.

**Fertilizer Canada supports this as an opportunity for Canadian growers and recommends that the Canada Water Agency support policy that rewards growers for proactive, sustainable efforts through market-based incentives (e.g., ecosystem markets) or educational programming.**



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As Environment and Climate Change Canada finalizes the creation of a Canada Water Agency, we ask that 4R Nutrient Stewardship be recognized as the standard for sustainable nutrient management. Fertilizer Canada stands ready to work with the Government of Canada as it establishes the Canada Water Agency and welcomes any questions or further discussions as it relates to this response.

Sincerely,

McKenzie Smith, Director, Stewardship and Regulatory Affairs

