



## Envisioning a Post-Pandemic Agriculture and Food System

*A sustainable and just food system for Canada as proposed by the National Farmers Union mitigate and prevent multiple cascading crises and provide the foundation of a good life.*

The COVID 19 pandemic is showing us where our current food and agriculture system is vulnerable, as well as who it serves and who it exploits. How the food system is structured profoundly affects our society. At minimum, we need a food system that provides adequate daily nutrition for our whole population. At its best, it will play an integral role in shaping and delivering a good life for all members of our society.

*As we look forward to the end of COVID 19 restrictions, let's not return to pre-pandemic normal, but envision the food system we want and prepare to make it a reality.*

According to recent public opinion surveys, Canadians want to know where their food comes from and how it was produced; they want to support Canadian farmers, buy local when they can, and are uncomfortable with highly concentrated ownership. Our massive emergency response to safeguard health and stability during this pandemic shows we can also harness societal recovery efforts to start building a food system consciously designed according to our needs and values. As we look forward to the end of COVID 19 restrictions, let's not return to pre-pandemic normal, but envision the food system we want and prepare to make it a reality.

### What the pandemic reveals

The first wave of COVID 19 showed that Canada's food production and processing depends on low-paid, vulnerable workers – often migrant workers, recent immigrants and women - who not only do very difficult jobs, but also risk their own and their families' health in the process. When Canadians went into lock-down, many stocked up on food and switched to larger, less-frequent grocery shopping trips. The rapid shift to home cooking required immediate adjustment in food processing to minimize waste and prevent shortages. Producers in the supply managed sectors were able to share the burden,

and have managed the pandemic's challenges more effectively than the highly export-oriented cattle and hog sectors. When the Cargill beef packing plant shut down, the price of cattle dropped sharply due to the backlog in processing and the lack of smaller abattoir, processing, storage, and distribution capacity. Hog farmers were forced to euthanize piglets when American hog finishers became overloaded due to plant shut downs from illness outbreaks there. Corn producers face low prices as a demand for ethanol fell alongside the reduction in fuel used for travelling. The impacts on other grain farmers is still unknown, but they could be seriously affected if railway transportation or ports suffer COVID-19 outbreaks. A common factor in all cases is that our current food system has little resilience. **The highly efficient, just-in-time approach has all but eliminated the food system's shock absorbers.**

*Where our food system has managed best – local food and supply managed sectors – democratic control and community power has maintained some cushion to soften the blows of uncertainty.*

Yet, Canadians also stocked up on local food from direct-marketers, subscribed to Community Shared Agriculture operations, and convinced health authorities to allow farmers markets to continue operating. While higher demand is welcome, many direct-marketing farmers are stretched to their limits adopting new online marketing tools, finding enough skilled workers and adapting to new public health measures. These responses show that both rural and urban Canadians value local food and are concerned about the pandemic's impact on farmers, consumers and food security. Where our food system has managed best – local food and supply managed sectors – democratic control and community power has maintained some cushion to soften the blows of uncertainty.

*(continued on page 2...)*

## Post-pandemic essentials

***Our post-pandemic food system will stand upon the three pillars of sustainability: ecological health, social justice and economic viability.***

The sustainability, security, and stability of our food supply; democratic decision-making, and fair incomes for both food providers and consumers must be at the centre of our post-pandemic food system. We also know that as a society, we all must confront the climate crisis – by reducing our emissions and becoming better prepared to manage climate chaos. The food system requires a strong foundation, so farmers must have security of land tenure, seed sovereignty, control of animal breeding stock and effective market power within the economy. Farmers also need to pass knowledge from generation to generation within farm families and to new farmers from non-farm backgrounds to support a vibrant ethos of agriculture that will nourish the larger community culturally as well as physically.

Our post-pandemic food system will stand upon the three pillars of sustainability: ecological health, social justice and economic viability. Using climate-friendly, low-emission production, it will deliver a healthy and secure food supply to Canadians and provide sustainable livelihoods to a larger, younger and more diverse population of farmers while engaging in fair international trade relationships. Our food system will broaden rural prosperity by embodying gender equity, anti-racism and decolonization. Farmers and farm workers will earn equitable incomes, realizing the full value of their products as Canada leaves behind its cheap food policy and reduces socio-economic inequality so that all can afford high quality, balanced diets. Measures to reduce farm debt will support affordable land tenure, creating conditions for long-term stewardship practises that protect biodiversity and help buffer the impacts of the climate crisis. A strategy of on-farm diversification and geographically dispersed food processing, storage and distribution will improve resilience, whether future disruptions are from the next pandemic, climate change or other crises. A shift toward producing more of the foods needed for a balanced diet will reduce the impacts of conditions outside of Canadian jurisdiction where commodities are exposed to export market vagaries and currency fluctuations. Our new food system will also help prevent future pandemics by reducing pressure to extend global food production frontiers into natural areas where new zoonotic (animal-to-human transmitted) diseases can emerge.

## Principles, elements and mechanisms

**Our new food system will require a network of formal and informal institutions based on food sovereignty and agroecology.**

Food sovereignty, the powerful concept developed by *La Via Campesina* in the mid-1990s, is about empowering farmers and eaters to define their own systems to produce healthy and culturally appropriate food for people through ecologically sound and sustainable methods. Food sovereignty focuses on food for people; it values food providers, localises food systems and puts control locally. It builds knowledge and skills and works with nature. Food sovereignty is created and maintained by empowered food producers and providers and the communities who rely on the food.

***Democratically controlled institutions will be at the heart of the new food system.***

Agroecology encompasses both how food is produced and how producers relate to their local ecological and social contexts. Agroecological production is often represented by circles – cycling materials within the ecosystem; care and nurturing of the commons; and reciprocal connections among community members – in contrast to extractive agriculture, which is represented by one-way arrows – from raw materials through consumption to waste; and exploitive relationships that move property, wealth and power into the hands of ever fewer and larger corporations. Agroecology provides a framework for climate friendly agriculture, by minimizing purchased inputs of GHG-emitting fossil-fuel intensive products and processes. Agriculture must do its part to repay the carbon debt, but it does not have the capacity to mop up after other industries – all must do their part.

Our post-pandemic food system also needs a regulatory system based on the precautionary principle to safeguard the air, water, biodiversity, and lands that are our heritage and our legacy. These regulations will have teeth to protect farmers and consumers against hazards, balance power in the marketplace, and ensure decision-makers are not insulated from the impacts of their actions.

Democratically controlled institutions will be at the heart of the new food system. Supply management; single desk marketing; producer, consumer, worker and multi-stakeholder co-operatives; land trusts; public research institutions; and community food hubs, farmers markets and CSAs are examples of institutions that can be expanded, improved, re-vamped, re-built and developed to ensure an ongoing balance of ecological health, social justice and economic viability is maintained. *(continued on page 3...)*

## Debts and power relations

For at least 35 years, Canada has reduced the size and scope of government through austerity measures and enhanced the power of multinational corporations through international trade deals. The COVID 19 pandemic and the failure to contain it can be understood as outcomes of these policies. **Globalization and austerity have created a massive debt by allowing the powerful to offload costs onto vulnerable people, rural and remote communities, ecosystems, the atmosphere, oceans and future generations.**

Building our post-pandemic food system requires rebalancing this policy-induced societal debt through large and sustained public investment. Already, governments at all levels are providing emergency funds to prevent the mass contagion and the collapse of our health system and to assist those struggling due to the economic impact of these public health measures. Further public investment will be required to integrate resilience into our food system to ensure we have the capacity to withstand the next crisis.

*Investments in resilience and stability will pay dividends in by reducing the need for emergency payments as our food system becomes less precarious.*

It will require public investment to develop institutions that ensure farmers receive a fair price for what they produce as a rule, instead of relying on market dynamics that keep farm prices at the bare minimum. Farm debt, now approaching \$115 billion, is increasing exponentially and largely driven by high input costs and land prices inflated by investor speculation. It will require public funds to reduce farm debt in an equitable fashion and ensure intergenerational land transfer occurs with dignity for both retiring and new farmers. Figuring out how to farm successfully with low inputs will require public research, another important use of public money to build a sustainable food system. Investments in resilience and stability will pay dividends in by reducing the need for emergency payments as our food system becomes less precarious.

Canada also has a debt to Indigenous people on whose land our country has been built. Our post-pandemic food system must honour the Treaties, traditional territories and inherent Indigenous rights. Indigenous food sovereignty is part of our food system; indigenous food lands and food ways will have priority over other potential activities and uses.

*...Canada will need to revamp our international trading relations to promote the fair trade of agricultural products without impinging on democratic governance.*

Internationally, the regime of interlocking trade agreements – CUSMA, the CPTPP, CETA and myriad bilateral agreements – constrain Canada's public policy space, hampering our democratic capacity to deal with the real issues that concern voters. These agreements have increased corporate influence over agriculture and food. However, corporations' legal duty is to maximize profits for shareholders, which is not a workable value system for managing recovery from COVID 19, addressing climate change, or dealing with future crises that may occur. To build our post-pandemic food system, Canada will need to revamp our international trading relations to promote the fair trade of agricultural products without impinging on democratic governance. These new trade agreements will impel a virtuous circle that enhances equity, diversity, and resilience among trading partners.

## Big lessons from a microscopic teacher

The global pandemic has not only revealed our food system's vulnerability, it has truly demonstrated that we are connected: a virus so tiny its size is measured in nanometres has travelled around the world on a network of human relationships in a matter of months, taking lives and wreaking destruction – but also activating world-wide, community-based cooperation and caring. We have shown Canadians can act together to keep COVID-19 from causing massive, uncontrolled deaths. Likewise, we can rebuild our agriculture and food system to support healthy nutrition for people, sustainable family farms, intact ecosystems and a liveable climate for future generations. ■

Visit our website at

[www.nfu.ca](http://www.nfu.ca)

**for resources and information to help manage the COVID-19 pandemic crisis.**

## 2019 Farm Revenue and Expense Data

### Farm income not as “high” as first appears, domestic fruit and vegetable market has room to grow

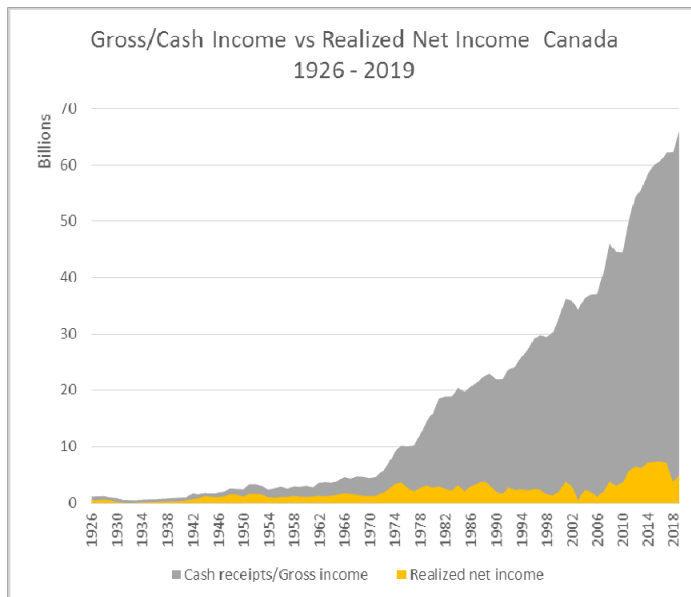
Every May, Statistics Canada publishes farm income data for the previous year. The numbers go all the way back to 1926, allowing us to see long-term trends and the big picture. It helps us see how policy, growing conditions, markets and support programs affect farm incomes. The number the NFU focuses on is Realized Net Farm Income, since it tells us how much money farmers have left after paying for production costs and asset depreciation. In 2019, total cash receipts were \$66 billion and realized net income was \$4.9 billion: farmers kept one dollar for every \$13.50 they produced.

However, including high-value/low-volume cannabis production in the data, makes Realized Net Farm Income data less meaningful in relation to the majority of farmers. (See *Have our statistics gone to pot?* on page 8) Cannabis, produced by 55 licensed growers on less than 1,000 acres, accounts for \$2.3 billion of 2019’s total cash receipts and is Canada’s 4<sup>th</sup> largest crop by revenue. Statistics Canada estimates cannabis production expenses at about \$1.55 billion. A rough of Realized Net Farm Income excluding cannabis gives us a just over \$4.1 billion. Non-cannabis farmers are left with just one dollar for every \$15.50 of farm product value produced. The high returns to cannabis production, and the small number of producers involved makes agriculture’s economic picture look rosier than it is in reality.

Realized net farm income also includes support payments, such as crop insurance, AgriInvest, Agri-Stability and provincial program payments. The size of support payments is an indicator of last year’s dire situation (see *Realized Net Farm Income nose-dives* in July 2019 Union Farmer Newsletter). In 2019 support payments were up by 40% over 2018. Much of this is due to weather and climate impacts. For example, crop insurance was up nearly 60% over 2018, and private hail insurance by nearly 50% for a combined payout of \$1.6 billion in claims.

In Newfoundland and Labrador, PEI, Nova Scotia, Ontario and Alberta support payments exceeded realized net farm income. There, farm expenses exceeded what farmers received from the markets.

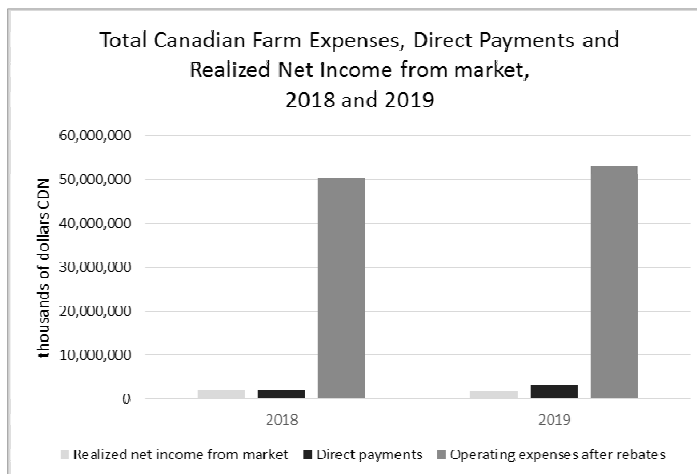
Expensive, high-input production, combined with lack of farmers’ market power means that agribusiness corporations, banks and railways are able to keep the majority of the value farmers produce. Meanwhile farmers



Source: Statistics Canada

– with some support from programs – must deal with the risks and losses due to storms, poor weather and volatile export market conditions.

The five products with the highest total revenues in 2019 were canola (\$8.6 billion), cattle (\$8.4 billion), milk (nearly \$7 billion), non-durum wheat (\$5.4 billion), hogs (\$4.6 billion) and meat chickens (\$2.8 billion). The five top expense categories were commercial feed (\$7.3 billion), cash wages, room and board, before rebates (\$6.6 billion), depreciation on machinery (\$6 billion), fertilizer and lime (\$5.7 billion) and interest payments (\$4.2 billion).



Source: Statistics Canada

(2019 Farm Revenue and Expense Data)

Revenues for the main field crops – canola, wheat, soybeans and corn – all declined in 2019. Soybean revenues went down nearly 18 percent from 2018, while durum wheat, oats and lentil revenues all improved in 2019. Cannabis revenue more than tripled, bringing in \$1.7 billion above its 2018 receipts. In livestock, hog revenues were up by 11 percent. Fresh vegetables, fruit, flowers and potatoes were all up slightly compared to last year.

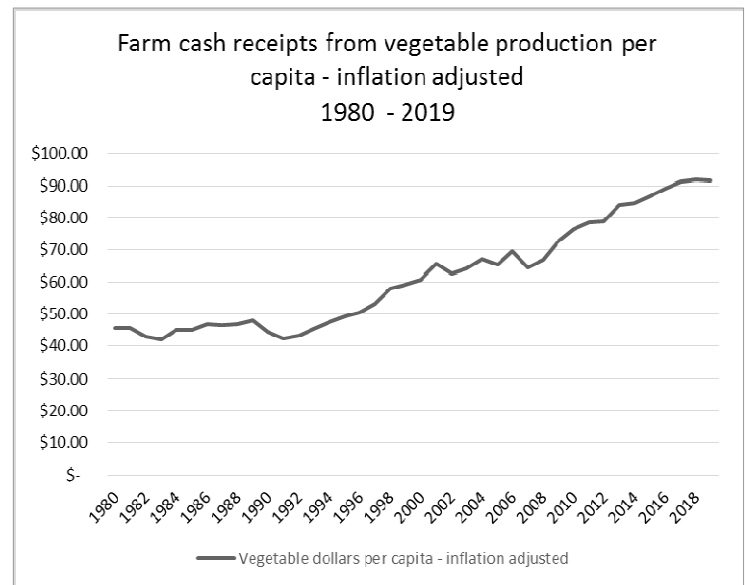
Canada-wide, interest expenses went up significantly in 2019. Farmers paid over \$4.2 billion in interest payments, an increase of \$580 million over last year. Wage costs increased by from 4 to 18 percent in each category. Legal and accounting costs went up by 12 percent. Fuel and stabilization premiums were the only expense categories that decreased in 2019.

Revenues from grain went down in 2019 in spite of the total grain supply for the 2018-19 crop year (production and carry-forward) being the largest on record. Farmers in Manitoba, Saskatchewan and Alberta are also spending more than ever on fertilizers, pesticides, herbicides and equipment. This is a predicted impact of lower prices due to dismantling the Canadian Wheat Board. When prices go down, farmers try to make up the lost income by using more inputs to increase yields and running more land with larger machinery.

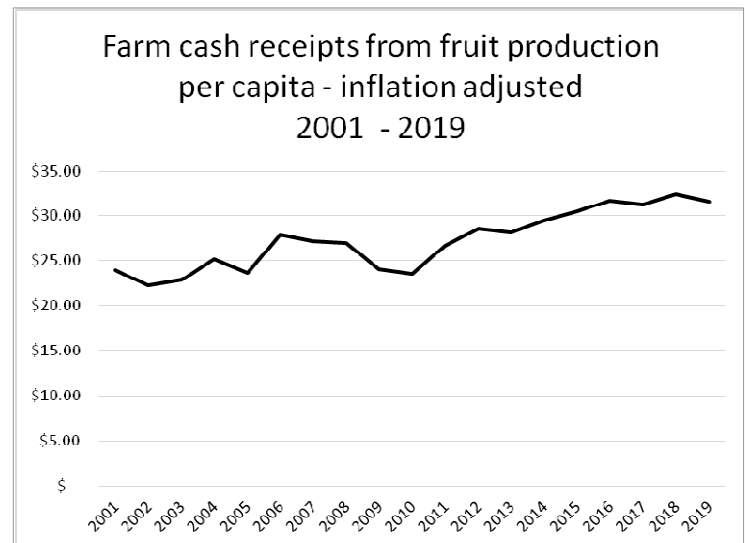
The positive revenue figures for fresh foods in 2019 builds upon similar good news for these products in 2018. It appears that increasing interest in local food and domestic food security are gaining ground, however slowly.

The graphs on the right shows farm cash receipts from vegetable and fruit production, adjusted for inflation, divided by the total Canadian population. In 2019, each resident on average contributed just over \$90 dollars to Canadian vegetable farmers, and about \$30 to fruit farmers over the course of a year. The

average household purchases about \$1250 worth of fruit and vegetables from the grocery store annually, suggesting a considerable untapped market for domestic production still exists.



Source: Statistics Canada



Source: Statistics Canada

## Canada Grain Act Review Update

The public review of the *Canada Grain Act* that was scheduled for April 1 to June 30, 2020 has been delayed due to the COVID 19 pandemic.

AAFC staff do not yet have information about when it will occur, but will notify us when new dates are set.

# Seed Synergy pushes for corporate control of regulatory system

## CSGA vote to be held July 15 – August 27

—by Cathy Holtlander, NFU Director of Research and Policy

One thing the COVID-19 pandemic has not disrupted is Seed Synergy's plan to consolidate power by holding a vote to amalgamate five of its member organizations -- Canadian Seed Growers Association (CSGA); Canadian Seed Trade Association (CSTA); Canadian Seed Institute (CSI); Commercial Seed Analysts Association of Canada (CSAAC); Canadian Plant Technology Agency (CPTA) – to form a new mega-organization to be called Seeds Canada.

Each of the five organizations will hold an amalgamation vote from July 15 to August 27, which will require 2/3 majority support from each group to pass. If any organization does not approve the amalgamation this summer, it is instructed to hold a second vote by December 15, 2020. Farmers who are members of their provincial Seed Growers Association are eligible to vote.

It is not surprising that amalgamation information presented on the Seed Synergy and CSGA websites is highly promotional, encouraging people to vote in favour. It is worth taking a closer look at the actual proposition. The resolution and accompanying documents are posted at <https://seedgrowers.ca/seeds-canada-ratification/>. The devil is alive and well in its details!

Seed Synergy's 2018 *White Paper* sets out its vision using the language of public relations to frame its pursuit of private corporate interests as progress, efficiency, modernization and service. However the substance of their proposal shows they aim for regulatory changes that will empower seed companies to increase their revenues and cut their costs at the expense of farmers, public science, consumers and ecosystems. See <https://www.nfu.ca/campaigns/save-our-seed/> for more information. To put it bluntly, their goal is to create a regulatory structure that would prevent farmers from freely using their own seed, ensure that agribusiness corporations control seed breeding, and replace public-interest quality control measures with purely commercial mechanisms.

### Governance sidelines farmers

The bylaws of the proposed organization outline its governance structure, including membership types, voting rights and board composition.

Seeds Canada would have three classes of membership: Business, Affiliate and Professional. Business Class members

are defined as “Business Entities who derive revenue from the Seed Sector Value Chain, which includes Regional Seed Associations, as approved by the Board, or the Governance and Nominating Committee of the Board” would be entitled to one vote per membership. The other classes are non-voting.

If Regional Seed Associations (such as the Saskatchewan Seed Growers Association) wish to continue as voting members, they each must restructure to mirror the membership criteria of Seeds Canada to include value chain representatives within three years. The Seeds Canada bylaws would also prevent Regional Seed Associations from making membership mandatory for receipt of a seed crop certificate. These stipulations would have the effect of reducing total membership in provincial seed associations and changing their composition.

Membership in Seeds Canada would be voluntary. Membership fees would be revised within a few years in order to fully fund its planned activities. Higher fees are likely to discourage independent seed growers from joining, minimizing their voices.

The first Seeds Canada Board of Directors would have 15 appointed members, with at least one from each of the seven Regional Seed Associations and at least four from the “Value Chain” representing seed developers, growers, seed trade and seed testing. Subsequently, elections will be designed to reduce the board size to 11. If a regional seed association spot is not filled, it can be filled by a “value chain” representative instead.

The impact of these governance and membership criteria are to marginalize seed growers nationally and provincially, and to enhance and encourage the participation of seed industry corporations.

### Delegated regulatory authority

The proposed bylaws also transfer the regulatory authority that has already been delegated to individual organizations to the new organization. The regional Seed Growers Associations, governed by farmer-elected seed growers, have functioned as a sort of professional association with regulatory power to uphold the integrity of the pedigreed seed system.

*(continued on page 7...)*

Amalgamation would consolidate this authority nationally, giving seed corporations a role in delivering and enforcing regulations. The proposed bylaws empower Seeds Canada to “carry out its delegated regulatory authority and regulatory mandates, as they exist at the Date of Amalgamation ...” These include but are not limited to the Commercial Seed Analysts Association of Canada arrangements with CFIA; the regulatory authority delegated to CSGA under the *Seeds Act* (Canada) and the *Seeds Regulations*; the CSGA’s *Canadian Regulations and Procedures for Pedigreed Seed Crop Production*; the CSI’s oversight of the Registered Seed Establishments, their licensed personnel, and the Accredited Seed Labs; and any relevant policies, guidelines, technical interpretations and other documents of the amalgamating Corporations.

The choice of name, Seeds Canada, may have been intended to further enhance the corporation’s authority by encouraging the assumption that it is a government agency like Health Canada.

### Advocacy

Seeds Canada’s bylaws set up a permanent Public Affairs and Advocacy Committee to lobby on those issues where it does not already have delegated authority to regulate. Seed Synergy expects CropLife Canada, the lobby for the biotech and pesticide industry, to “enter into a MOU with Seeds Canada to ensure harmonized policy agendas and close collaboration on issues of mutual interest through coordinating respective roles and responsibilities to facilitate cooperation and avoid duplication. CropLife Canada will also be included in public affairs and advocacy subcommittees that affect their membership. Seeds Canada professional staff will provide support to the committee, including acting as secretary.”<sup>i</sup>

Seeds Canada would be the vehicle for the corporate sector to lobby for changes to the *Seeds Act Regulations* when the regulatory review planned for 2021 occurs.

### Agriculture Canada and CFIA involvement

Nobody can deny the importance of seed – not only to farmers and agriculture, but to ecosystems, food security and society at large. The case for public interest oversight of seed is unassailable. The implications of seed being controlled by private interests for private gain are dire, and have motivated the NFU and our allies to fight for farmers’ seed rights for over 50 years. Yet, our federal government has funded, and actively encouraged the Seed Synergy partners to pursue a take-over of the national seed agenda, by granting it \$760,000 in 2018 to develop their proposals. In 2019, AAFC withdrew from its public consultation process on “value creation”, saying it will await direction from “the industry” in spite of overwhelming and unequivocal opposition to farm saved seed royalties by farmers.

### Understanding Regulatory Capture

Regulatory capture, also known as “the economic theory of regulation” or simply “capture theory,” became known in the 1970s due to the late George Stigler, a Nobel laureate economist at the University of Chicago who first defined the term. Stigler noted that regulated industries maintain a keen and immediate interest in influencing regulators, whereas ordinary citizens are less motivated. As a result, even though the rules in question, such as pollution standards, often affect citizens in the aggregate, individuals are unlikely to lobby regulators to the degree that regulated industries do.

Moreover, regulated industries devote large budgets to influencing regulators at federal, state, and local levels. By contrast, individual citizens spend only limited resources to advocate for their own rights....

Regulatory agencies that come to be controlled by the industries they are charged with regulating are known as captured agencies, and agency capture occurs when that governmental body operates essentially as an advocate for the industries it regulates. Such cases may not be directly corrupt, as there is no quid pro quo; rather, the regulators simply begin thinking like the industries they regulate, due to heavy lobbying.

- from [Investopedia](#)

The relationship between AAFC, the CFIA and the Seed Synergy groups has all the hallmarks of regulatory capture. The Seeds Canada proposal goes even further, as the Seed Synergy groups are positioning themselves to replace the public regulator. If they are allowed to succeed, the democratically accountable public regulation process will be turned inside out and self-interested corporations will be regulating farmers instead.

### How can we stop this?

Take action in your province to inform, educate and mobilize seed growers to vote against the amalgamation proposal. The amalgamation requires two-thirds of votes cast to pass. CSGA members will be able to vote online from July 15, 2020 until the close of a virtual Special General Meeting to be held on August 27, 2020, from 11 am to 1 pm Eastern.

<sup>i</sup> [The Next Generation Seed Organization: Seeds Canada - Business Plan, May 2020, page 18](#)

## Have our statistics gone to pot?

When Statistics Canada released the 2019 farm net income numbers at the end of May, cannabis had a noticeable impact. It made up over 6% of crop revenues in 2019. While cannabis revenues went up, the aggregate revenue of all other crops went down by 1.1% in 2019. In Ontario, cannabis cash receipts were higher than the realized net farm income of all the province's farmers.

Cannabis was legalized as of 2017, and production is highly controlled. Growers are licensed by Health Canada. They must provide detailed information about all aspects of their operation, require security clearances for all involved, and may sell only to authorized distributors and retailers.

In 2019 the number of licensed cannabis growers increased from 12 to 55, with 14 receiving their licenses in November and December. Most production is done indoors, though 33 are "cultivation" licenses, allowing – but not requiring – outdoor production. Canada's total area of cannabis production in 2019 was approximately 810 acres.

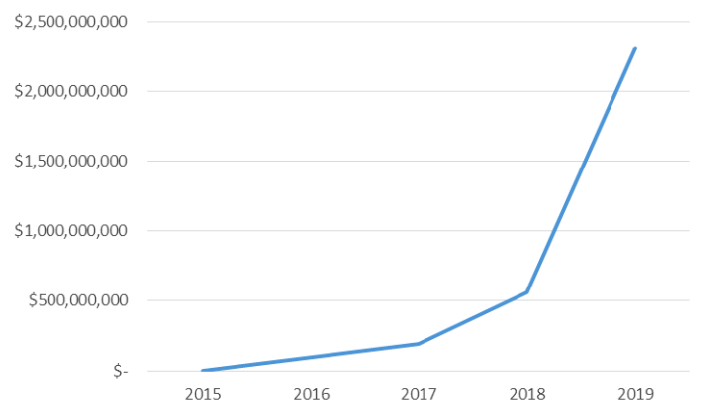


In 2017, total farm revenue for cannabis was \$189 million. By 2019, Canada-wide farm cash receipts from cannabis had grown to \$2.3 billion dollars. This is \$96 million higher than total grain corn revenue!

Agricultural expenses are not reported by crop, so we don't know cannabis farmers' operating costs, though Statistics Canada estimated that 2019 cannabis production expenses were about half the increase in total farm expenses, or \$1.55 billion. These high income growers are clearing close to \$1 million/acre, or an average of \$1.36 million per license!

operating costs, though Statistics Canada estimated that 2019 cannabis production expenses were about half the increase in total farm expenses, or \$1.55 billion. These high income growers are clearing close to \$1 million/acre, or an average of \$1.36 million per license!

Farm cash receipts, Cannabis seeds, vegetative plants and flowering tops (including leaves), Canada 2015 - 2019



Source: Statistics Canada Table: 32-10-0045-01

The NFU is concerned that including the new cannabis production sector in long-term farm income statistics will make current and future data no longer comparable to past data. Cannabis operations are mostly high-tech, often hydroponic, temperature, light and humidity controlled indoor production sites. All are operated under tight scrutiny by Health Canada, and sell into a very controlled market. Many are vertically integrated into processing and distribution corporations. Cannabis is unlike any other low-acreage niche market crop.

Government decision-makers use agriculture statistics to inform policy. If their view is clouded by cannabis numbers they will be unable to assess the sector's needs or the impacts of policies and programs. The NFU would like Statistics Canada to clear the air by providing cannabis-free agriculture statistics.

### CUSMA and the Canada Grain Act

Bill C-4, the law that implements the Canada-United States-Mexico Agreement (CUSMA), will come into effect on July 1, 2020. On that date grain grown in the United States will be eligible to receive an official Canadian grade if it's of a variety that is registered in Canada, country of origin statements will no longer appear on inspection certificates for grain grown in the United States, and it will be mandatory for anyone who sells grain to a licensed grain company to complete a declaration of eligibility saying that the grain they deliver is a variety eligible for a Canadian grade.

Farmers in Western Canada must start providing these declarations starting August 1, 2020. Farmers in Eastern Canada will have until July 1, 2021 to comply because delivery declarations have not previously been in use there. See <https://grainscanada.gc.ca/en/protection/delivery/declare-eligibility-of-grain.html> for the declaration form and more details about this requirement.