



March 10th, 2024

Canadian Grain Commission
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Submitted via: discussions@grainscanada.gc.ca

Re: Grain Standards Advisory Committees Feedback

On behalf of Grain Growers of Canada, we thank you for the opportunity to provide comments in response to the proposal to revise the Grain Standards Advisory Committees. The *Canada Grain Act* and Canadian Grain Commission provide fundamental protections, services, and assurances for thousands of grain producers across Canada. All members of the Canadian grain value chain are united for the same purpose: to sell high-quality grain to feed domestic and global markets. It is essential that any revisions to the advisory committees support the interests of grain producers while maintaining the integrity and effectiveness of Canada's grain standards. We look forward to working collaboratively to ensure that the proposed changes contribute to the continued success and growth of the sector.

As the national voice for Canada's grain farmers, Grain Growers of Canada (GGC) represents over 70,000 producers through our 14 national, provincial and regional grower groups. Our members steward 110 million acres of land to grow food for Canadians and for 160 countries around the world, creating \$45 billion in export value annually. As the farmer-driven association for the grains sector, GGC champions federal policies that support the competitiveness and profitability of grain growers across Canada.

Purpose of Changes

The rationale for moving towards an open-forum model is unclear. As such, we are requesting further clarification from the Commission. Specifically, we seek insights into how the current system is not meeting the needs of the grain sector and we hope to understand how the open-forum model will continue to support a balanced and effective platform for discussion and decision-making within the grain value chain.

The sub-committees within the current model are highly technical and focus on science-based outcomes, drawing from expertise across the value chain and different commodities. There is significant technical and scientific data presented at the meetings to support those science-based recommendations. To foster effective meetings, it is necessary to have continuity of members to have those discussions. Unfortunately, we believe that the new proposal does not lend itself well to the type of engagement and involvement needed within these committees. We are also concerned that the proposed open forum lacks aspects of good governance.

Diluting Producers' Perspectives

Our primary concern with the proposal is that insights from producers will be diluted among other members of the grain value chain. According to section 13 of the *Canada Grain Act*, "...the Commission shall, in the interests of the grain producers, establish and maintain standards of quality for Canadian grain and regulate grain handling in Canada..." The current model is segmented by commodity types, ensuring that a balance of voices from the grain value chain, including producers, are represented at each subcommittee. The current sub-committees are well-functioning. However, the proposal creates a model that has the potential to reduce the representation of producers and ultimately does not act in the interests of Canadian grain farmers. The proposal will allow any buyers, exporters, and interested stakeholders to participate in the forum. Producers who serve on these committees understand the soil, climate, and disease challenges on their farm and they can share their own experiences of how different aspects throughout the growing year might have affected these grading factors. If producers' perspectives and experiences are overshadowed by other value chain members, they risk unnecessary dockage, affecting their business' bottom line. Should the advisory forum model move forward, we suggest that a quorum be implemented with a minimum number of producers be necessary to conduct the meeting. In addition, we recommend that the Western and Eastern Standards Committees have a clear majority of producers to ensure that the final grading decisions are in the interests of producers.

Organization of the Forum

In the proposal, it remains unclear how the Commission will organize the advisory forum. If there are too many topics, it could take an excessive amount of time to move through the agenda and each item may not receive the dedicated time needed for discussion. Due to the highly technical nature of the subcommittees, adequate time dedicated to each topic is necessary. However, if the Commission triages issues to shorten the agenda, this would undermine the accessibility and transparency the Commission is trying to achieve. Similarly, this proposal may invite too many individuals into the discussion, simply slowing down the efficiency of the forum. In context of the current sub-committee model, we suggest that in advance of the meetings, the Commission look to provide further technical information to all parties in attendance. Summaries with concise explanations would better support members with their role on the committee.

In conclusion, we believe that the subcommittees should be preserved in their current form. We thank you again for the opportunity to provide feedback this proposal and we recognize the important role that the Commission provides to producers, and we want to ensure that changes to the subcommittee model adequately represent the interests of grain farmers across Canada and outcomes remains science-based, rather than opinion-based. If you have any questions, please reach out to me and we would be happy to discuss further.

Sincerely,

Kyle Larkin
Executive Director
Grain Growers of Canada