



MANITOBA BEEF PRODUCERS SUBMISSION RE: CONSULTATIONS ON *GREEN PROSPERITY ACT*

March 25, 2013

Manitoba Beef Producers:

- Manitoba Beef Producers (MBP) is a non-profit organization, with a producer-elected board that consists of 14 directors, each representing cattle producers in a specific region or district.
- MBP represents approximately 8,000 individual cattle producers involved in various aspects of the beef cattle industry, including the cow-calf, backgrounding, and finishing sectors.

The importance of the Agriculture industry to Manitoba's Economy is significant:

- Agriculture drives a significant portion of Manitoba's GDP and is one of the single largest wealth-generating activities in the province
- Beef production represents Manitoba's single largest agricultural sector in terms of the number of individual farm operations. Our industry plays a vital role in the maintenance of Manitoba's economic and environmental sustainability.
- On an annual basis Manitoba's beef cattle industry purchases over \$300 million in feed. Beyond feed, beef producers purchase \$225 million in operating inputs each and every year. The value of goods and services demanded by Manitoba's beef operations is about \$635 million annually.

The importance of the beef industry to the environment is undeniable:

- According to a study conducted by the University of Manitoba on the Value of Grasslands in Manitoba, the total assessed value of the social, agricultural, and landscape-ecological grassland function in Manitoba is \$31.4 billion.
- Pastures are widely sought by various species and wildlife. Pastures are home to 33 different species at risk (endangered and threatened).
- Beef producers maintain and preserve wetlands and perennial green cover on their pastures, which provide ecological goods and services that are otherwise lost through drainage and restoration.

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MANITOBA CATTLE PRODUCERS ASSOCIATION

Manitoba Beef Producers' Introductory Comments on the Proposed *Green Prosperity Act*

Manitoba Beef Producers (MBP) welcomes the provincial government's consultations on a possible *Green Prosperity Act* to replace the *Sustainable Development Act*. MBP appreciated the opportunity to participate in the February 28, 2013 engagement workshop and looks forward to continued engagement in this process.

However, in the absence of an actual first draft of the proposed legislation introduced in the Manitoba Legislature, MBP cautions that it is difficult to provide fully-informed comments on what the act could entail, how it may be implemented within and outside government and how this may affect stakeholders.

For example, the *Green Prosperity Act* consultation document contains neither a proposed definition of "sustainability" nor does it clearly articulate what the province's expected sustainability goals will be.

As such, MBP believes organizations' views on elements of the proposed legislation are likely to evolve when the legislation is formally introduced in the Manitoba Legislature for debate. It is in this context that MBP offers feedback on the consultation document for the proposed Act.

MBP is also concerned that the proposals in the consultation document, if implemented, would represent a shift away from structured, evidence/science-based decision making on sustainability questions and towards a less-structured approach with increased discretion and decision making authority left to Cabinet. If this occurs Manitoba will face greater business uncertainty, driving up the cost for investors in our province and encouraging the flow of capital to other regions.

Our membership is also concerned that the proposals will result in a substantive increase in operational and infrastructure costs with no demonstrable environmental benefit. This will also inhibit investment in rural Manitoba and our industry. Increased costs will drive investment out of rural Manitoba, out of our province and encourage the flow of capital to other regions.

Further to the key points raised above, Manitoba Beef Producers strongly believes that any definition of "sustainability" **must** include "economic sustainability" as a key pillar. It is our assessment that this critical pillar is not adequately reflected in the consultation documents, for example on page four of the consultation document where the core focus of upcoming legislation is discussed.

Manitoba Beef Producers' Responses to Specific Consultation Questions

Questions re: background and outline of proposed legislation (page 3):

Does government's internal structure need to better reflect a commitment to sustainability? For example, is it necessary to have a central co-ordinating body that ensures the adoption of sustainability across government?

How can the roles and functions of various government agencies be more fully co-ordinated to achieve goals such as those presented in TomorrowNow - Manitoba's Green Plan?

Manitoba Beef Producers agrees that the provincial government's internal structure has and must continue to reflect a commitment to sustainability. That is the role of responsible governments. As noted previously, a clearly articulated definition of "sustainability" needs to be included in any future legislation to help focus the government's priorities and the coinciding allocation of public resources to help achieve the goals.

MBP also agrees there should be a “*standardized and complimentary approach to implementing environmental sustainability across government departments,*” as noted on page 3. This will help ensure continuity in adopting sustainability principles throughout government and should enhance the government’s own internal assessment and reporting capabilities in this area.

In a related vein, MBP believes a similar approach should be taken by the Manitoba government when it legislates/regulates sustainability requirements expected of business and industry so different departments do not impose conflicting requirements.

MBP recognizes the need for a “clear chain of command” when it comes to ensuring the adoption of sustainability requirements across the provincial government or for achieving the multitude of goals presented in *TomorrowNow – Manitoba’s Green Plan*. However, MBP does not believe a new freestanding agency with an extensive bureaucracy should necessarily be established to achieve this.

It is MBP’s position that the oversight role this could be achieved by retaining the Manitoba Round Table for Sustainable Development (or using a similar type of entity, such as a coordinating council as in Alberta) and providing it with the tools to ensure that designated sustainability goals across government are being met.

Such a body should also have the ability to suggest corrective actions to departments and Cabinet if the government’s internal sustainability goals are not being met. The make-up of such a Round Table or similar entity should be structured to allow for participation by outside experts who can offer in-depth analysis on various elements of the government’s sustainability platform.

The roles and functions of various government agencies could be more fully co-ordinated to achieve goals, such as those presented in *TomorrowNow – Manitoba’s Green Plan*, through the use of interdepartmental working groups. For example, this model has been used in areas such as the Manitoba EG&S Initiative Working Group. It featured both an interdepartmental Policy Working Group and an external Stakeholder Knowledge Group. This may be an appropriate vehicle to use as different elements of the *Green Plan* are considered. This model would effectively augment a body like the Round Table proposal discussed above.

MBP suggests that the Manitoba government needs to evaluate the following questions: **is the provincial government confident that it can adopt its own internal sustainability goals and properly enforce the achievement of these goals through self-monitoring and reporting? Or, is there a growing public expectation that an independent third party is required to perform these tasks, such as an environment commissioner?**

Similarly, **does the Manitoba government believe that there are adequate internal resources to assess the needs, capabilities, economic contribution and unique environmental stewardship of each sector of the Manitoba economy? Or should there be an independent third party available that can bring in outside expertise for assessment and analysis?**

As noted earlier, MBP strongly holds that any evaluation of sustainability must include an analysis of economic sustainability as one of the key assessment pillars. The inclusion of economic sustainability should be part of any act that is brought before the Manitoba Legislature and part of the evaluation mandate given to the co-ordinating body, no matter what form that body will take.

MBP respectfully requests that any future reorganization of departments and agencies only occur after appropriate analysis and consultation has been undertaken of the risks and benefits associated with such changes. For example, the creation and subsequent dissolution of the Department of Water Stewardship caused considerable confusion amongst stakeholders who needed to have specific water-related issues addressed.

Questions re: Development of New Legislation (page 4):

Does the name the Green Prosperity Act adequately reflect the government's intent to use the principles of sustainable development to foster a green and prosperous society?

Sustainable development is classically defined as "...meeting the needs of the current generation without compromising the ability of future generations to meet their own needs". Should the new act continue to be built around the classic definition of sustainable development or should it adopt a new approach to, and definition of, sustainability? How do you define sustainability?

Manitoba Beef Producers does not believe that the title *Green Prosperity Act* adequately reflects the government's stated intent to "shift focus towards environmental sustainability" (page 4) and is in fact so vague that it may leave the public confused as to its actual intent. The name suggests there may be an economic development angle to the legislation, but it is not clear.

MBP believes that the existing name of the legislation – *The Sustainable Development Act* -- is in fact more reflective of the government's stated environmental focus.

MBP supports the use of the classical definition of sustainable development, i.e. "...meeting the needs of the current generation without compromising the ability of future generations to meet their own needs". However, we strongly hold that this definition includes the concept of "economic sustainability". We are concerned that the consultation document does not reflect this critical component of sustainability. The definition, including the concept of economic sustainability, recognizes that societal actions can affect positively or negatively affect the well-being of society, the economy and the environment.

This definition of sustainable development is quite reflective of Manitoba's beef sector. There is no question our producers play a significant role in maintaining and growing our rural economy. What is not often well understood is that our sector also drives jobs in our urban centres like Winnipeg, Brandon, Portage la Prairie, etcetera.

Beef producers are also significant contributors to other pillars of sustainability. For example, well-managed pastures have the unique ability to encourage grassland preservation while maintaining economic productivity. Pastures provide habitat widely sought by various species and wildlife. This is shown by work done on the 930,000 hectares of grasslands that are preserved in the community pasture program in Manitoba. These pastures alone provide a home to 33 different species at risk (endangered and threatened). Well-managed pastures also promote biodiversity, as can be found by comparing biodiversity on forage and pasture land with areas aside as nature preserves and not grazed.

Questions re: Purpose (page 4):

Are there any other elements that could be added to the purpose statement?

What do you think is the best way to achieve the three elements mentioned above?

Purpose Statement

There are no references in the proposed purpose statement to a number of key principles contained in the existing *Sustainable Development Act* such as integration of environmental and economic decisions, prevention, or stewardship. In fact, the existing principle of stewardship is eliminated in the proposed revised principles outlined in the consultation document, and only partially reflected in the proposed section on social justice.

Reflecting back to MBP's introductory remarks in this document, the exclusion of some of the key principles contained in existing legislation is one of the reasons why MBP is concerned that the proposals presented represent a shift away from structured, evidence-based decision making.

MBP strongly believes that these shortcomings must be corrected prior to the introduction on legislation. We specifically request that:

- The concept of economic sustainability must be included in the purpose statement;
- Stewardship should be included in the purpose statement. There is an expectation that if larger society is going to be expected to or legally required to be responsible stewards of the environment and to follow the principles of sustainability that governments should also be seen to be making this a priority and including it in the purpose statement of a new Act; and
- Prevention and mitigation be included in the purpose statement. MBP notes that in the purpose section of Alberta's *Environmental Enhancement and Protection Act* (pages 21-22) their legislation recognizes "the importance of preventing and mitigating the environmental impact of...government policies, programs and decisions."

Again, MBP suggests that if the provincial government is going to be applying sustainability requirements of private sector agencies, industry and other organizations there will be an expectation that the Manitoba government will assess and mitigate the environmental impact of its own policies, programs and decisions. This was reflected somewhat in the *Sustainable Development Act* in the references to full-cost accounting and the section pertaining to integration of environmental and economic decisions.

Prevention and mitigation should include active co-operation with governments of other jurisdictions. MBP suggests that this concept be explicitly included in the anticipated *Green Prosperity Act*. There are examples of explicit recognition of co-operation in the legislation of our neighbors. For example, in the purpose section of Alberta's *Environmental Enhancement and Protection Act* there is a reference to the provincial government's responsibility to "work co-operatively with governments of other jurisdictions to prevent and minimize transboundary environmental impacts."

MBP believes the Manitoba government has a similar responsibility and would like to see this principle contained in future sustainable development legislation. The issue of transboundary environmental impacts has been particularly salient to Manitoba's beef industry with respect to water management, and in particular flooding.

Achieving our Goals

With respect to the question of what is the best way to achieve the three elements outlined in the proposed purpose statement, MBP must again ask – what is the primary focus of the proposed act – protecting the environment, stimulating community economic development or advancing the principles of social justice?

While all three are very worthy aims, MBP reiterates that the question remains whether all three public policy goals can be reasonably achieved in a single piece of legislation? Or is there the risk of dilution and aims not being met?

For example, will the Ministry of Conservation and Water Stewardship be tasked with taking on new roles related to community development such as: trying to stimulate job creation; providing education and training opportunities; and, promoting health and wellness and creating neighborhood stability, among others? Will

added roles diminish the Ministry's ability to deliver on environmental sustainability? Will lack of expertise in the Department of Conservation and Water Stewardship (that may be possessed by other departments) in other key areas of sustainability (e.g., economic sustainability) result in measures that may be well intentioned but which generate negative impacts for the province as a whole?

MBP believes that whatever sustainability policies the provincial government develops and applies to itself the principles and requirements must be clearly articulated, the delivery methods clear, the measurement tools identified and the consequences for non-compliance clearly stated. This will ensure accountability to Manitobans.

Questions re: Sustainability Priorities (page 6):

Do the sustainability priorities outlined above adequately reflect the priorities of Manitobans now? Will they reflect the priorities of our province 20 years from now? If the priorities evolve over time, how could these changes best be captured in future?

Manitoba Beef Producers believes the sustainability principles outlined in the consultation document are so broad as to be generally acceptable to most Manitobans at this time and 20 years from now. That is unless future advances in science and technology are so significant that effective ways are found to address some current environmental and energy challenges and to create new economic opportunities at the same time.

However, while the broad principles outlined may find wide acceptance with the citizens of Manitoba today, they may be too broad to facilitate the advancement of sustainability. For example, the concept of economic sustainability should be more explicitly part of the priorities outlined. Failure to meet this pillar of sustainability will harm all other aspects included in the definition. This is true regardless of the public opinion of today.

While the consultation document holds the promise of the "green jobs" of tomorrow, we cannot lose sight of the jobs that are driving the economy today. MBP will always support science-based measures to improve the environmental health of our province. But these measures must be implemented in a way that mitigates any potential negative economic impact. If we fail to accomplish this priority today the economy will be in no position to take advantage of potential jobs that may arise tomorrow.

One priority of utmost importance to Manitoba's beef industry is how water will be managed, both from the perspective of flooding and drought. Years of excess moisture conditions and flooding have had a devastating impact on beef production in Manitoba, driving many producers out of business. Recovery from the associated damage to pastures and forages will take years and restrict production. Under severe drought conditions, beef production will be difficult if not impossible in some regions.

Manitoba Beef Producers reiterates that in order for our industry to be economically sustainable, comprehensive water management strategies are required in our province to address both the risk of flooding and drought. Co-operation with our neighbors in Canada and the United States will be integral to the success of these strategies.

How can Manitoba ensure that the new act evolves and remains current? Should it be prescriptive, or set out only basic principles and guidelines with more prescriptive regulations created as needed?

With respect to the questions of evolving priorities and ensuring a new Act remains current, MBP suggests that it contain provisions for a regular review of priorities, probably within a three to five-year window. This should include an opportunity for public consultation.

MBP believes that consideration should also be given to including in a new Act a requirement for a provincial sustainability report which, among other things, could help to identify emerging trends or issues which may require additional attention.

Manitoba Beef Producers prefers that a new Act should not be prescriptive, but rather contain principles and guidelines. To the greatest extent possible, the Manitoba government should rely on incentives and co-operation with the province's economic drivers (e.g., beef producers) rather than production and income-limiting regulations. Prescriptive regulations should be developed only as required and only as a last resort.

MBP suggests that consideration should be given to the continued use of Manitoba's Provincial Sustainable Development Code of Practice as many of its principles and guidelines remain as relevant today for government as when it was first developed.

MBP requests that a co-operative and flexible approach be adopted to meet society's goals for sustainability, including areas of particular interest to Manitoba's beef producers, such as habitat and species preservation and water management.

For example, *Tomorrow Now – Manitoba's Green Plan* contains a commitment by the provincial government to develop added partnerships with the agricultural industry to "encourage the preservation and development of ecological goods and services to benefit Manitoba's environment while supporting a strong agricultural sector and rural economy."

MBP is pleased to see this commitment as it has long advocated for societal and financial recognition of the ecosystem services provided by Manitoba's beef producers.

In November 2008, the MBP presented a detailed proposal for an Environmental and Rural Stewardship Incentive Program (ERSIP) to the Manitoba government. It requested the introduction of a province-wide, Social and Ecological Goods and Services payment program. It is an incentives-based approach and producer participation would be voluntary. This is the type of co-operative "sustainability" initiative that should be encouraged by the *Green Prosperity Act*.

Question re: Manitoba Sustainability Advisory Council (page 6):

What role would you like to see the Manitoba Sustainability Advisory Council play in the implementation of a sustainability vision for Manitoba?

Manitoba Beef Producers would have like to have seen in the consultation document a detailed explanation as to why the Manitoba Round Table for Sustainable Development (MRTSD) is being transitioned into a Manitoba Sustainability Advisory Council that will only meet at the discretion of the Minister. Were there specific concerns about the functionality of the Round Table that could have been addressed without replacing it outright, such as modifying its roles and responsibilities or changing the composition of the membership?

It is MBP's position that an updated and potentially more active Round Table would play a useful role in the implementation of a sustainability vision. The existing Round Table has the power to conduct studies and investigations and to advise and make recommendations to the minister. This process could be particularly relevant if a future Round Table is allowed to solicit expert members who can assist in examining specific issues and in providing science-based expertise and technical advice to better inform the development of sustainability strategies.

MBP strongly believes that arms-length independence from Cabinet is critical to the success of the advisory body. Further, maintenance of the arms-length nature of the advisory body will help give confidence to potential investors in our province that sustainability decisions will be evidence/science-based and not adversely impacted by varying public opinion. While MBP has confidence in the decisions of the Minister, there will be some who will interpret an increased Cabinet/Ministerial role in specific sustainability issues as an increase in uncertainty, resulting in an increased business risk and therefore a decline in the desirability of Manitoba as an investment opportunity.

And, whereas the current Round Table membership is heavily weighted toward cabinet ministers and government MLAs, MBP believes it may be beneficial to have more “experts” (including dissenting opinions) at the table when examining sustainability policies. This could help ensure a balanced approach to public policy development and this may be seen by Manitobans to be providing more accountability.

If the role of the proposed Manitoba Sustainability Advisory Council is going to be restricted primarily to tasks such as sponsoring the Manitoba Excellence in Sustainability Awards, its overall usefulness will undoubtedly be questioned by the public and this specific function could probably be served by a committee made up of staff from the Department of Conservation and Water Stewardship.

Questions re: Revised Principles and Guidelines of Sustainability (page 11):

Do the proposed principles sufficiently reflect the concerns and issues surrounding Manitoba’s society, environment and economy? Will they reflect Manitoba’s sustainability concerns 10 years from now? Do you have any recommended changes to these proposed principles or guidelines?

Manitoba Beef Producers is not fundamentally opposed to any of the proposed revised principles. We believe Manitobans’ sustainability concerns will continue to focus on matters related to the health of the environment, the economy and larger society. However, there could be emerging issues over the next 10 years that are not currently envisioned. Public policies and strategies may need to be adjusted to take those into account. New legislation must be flexible enough to allow for these adjustments to take place.

However, MBP does believe that the proposed principles can, and should be, significantly revised.

As previously stated, MBP strongly holds that the principles do not adequately reflect all pillars of “sustainability”. In particular it is our assessment that the concept of “economic sustainability” is significantly lacking from the principles and guidelines.

In Proposed Revised Principle 1 (Integrated Decision-Making), there is a reference to “political” dimensions. MBP suggested the proposed principle be revised to read: “Manitobans recognize that the environment, the economy and human society are completely inter-connected. The best decisions will be ones which reasonably integrate the needs of all these areas.” Use of the word “political” may suggest that the government’s decision-making processes are partisan rather than being based on evidence like sound science and full-cost accounting. This could diminish public trust in the process.

MBP asks why the reference to “consequences” has been removed in Proposed Revised Principle 1. While the concept of “integrated decision making” recognizes “interconnectedness” and “needs”, MBP believes potential positive or negative consequences of policies need to be taken into account as part of the Manitoba government’s decision-making processes. It is about accountability.

MBP questions why the current principle of “stewardship” (current Principle 2) has been removed outright, with only one element of it incorporated in the new section on social justice (proposed Principle 9).

As noted previously, MBP believes any future legislation should contain references to the principle of stewardship and government's responsibility in this regard. This is clearly set out in Manitoba's Provincial Sustainable Development Code of Practice which states, "The decisions and activities of the public sector shall strive towards...being effective stewards in the management of the economy, environment, human health and social well-being for present and future generations." MBP would like to see the principle of stewardship more clearly articulated in a future act.

With respect to Principles 4, 5 and 6 MBP reiterates its interest in seeing a strong commitment by the provincial government to mitigation, rehabilitation and reclamation. If legislated requirements are being made of industry in areas such as mitigation, rehabilitation and reclamation there will be a concomitant expectation that the provincial government will be adhering to the same standards. That is only reasonable and MBP would like this area of the principles revisited. We support existing principles 4 to 6.

With respect to Principle 5, MBP notes that there seems to be some "watering down" with respect to the original principle of "enhancing the long-term productive capability, quality and capacity of natural ecosystems". It is MBP's position that advances in science and technology could offer the potential for enhancements to the environment and that governments and society should be striving for continuous improvement where possible as opposed to being satisfied with the status quo.

Regarding new proposed Revised Principle 8 (Community Economic Development), MBP suggests it be rewritten to be more concise, i.e., "Manitobans should consider the potential of community economic development to help address challenges and capture opportunities." More detailed information about what community economic development may entail could be provided in a separate set of guidelines.

MBP also notes that in the principles of community economic development listed on the Manitoba Entrepreneurship, Training and Trade website there is a reference to "interdepartmental and intergovernmental collaboration." MBP requests that this also be taken into consideration as it is an important component.

Re: Proposed Revised Principle 9(3), it states "...certain natural resources – especially air and water – are central to our very existence." MBP strongly recommends that "soil" be added to this list of natural resources as it is key to food production and to sustaining habitats. Or, alternatively, simply state that "*certain natural resources are central to our very existence.*"

In the end, Manitobans will want to see how well the principles being proposed under a future Act have actually been translated into meaningful improvements to our environment, our economy, our quality of life and the state of Manitoba society.

Question re: Sustainability Agreements (page 11):

Do you have any questions or comments about this proposed provision? (p. 11 – Sustainability Agreements)

Manitoba Beef Producers has a number of questions about the proposed sustainability agreements which we believe need to be addressed before further action is taken. These include:

- Will the proposed agreements be mandatory or voluntary?
- On what scientific basis will such agreements be developed?
- Will industry be thoroughly consulted in the development of such agreements to ensure that needed sectoral expertise is obtained?
- Will the economic impact of such agreements be assessed and considered when developing them?

- Will sustainability agreements take into account the existing legislated requirements of industry, either federal or provincial?
- Will there be a dispute resolution mechanism if the provincial government and the affected industry cannot reach an agreement on certain elements of the sustainability agreement?
- Will there be recognition of voluntary initiatives and codes of practice that are already being used by various sectors, such as the codes of practice for the care and handling of farm animals?

MBP believes the Manitoba government also needs to recognize that many industries are investing considerable resources into developing their own internal sustainability strategies or they are partnering with national or international organizations in this regard.

For example, the Canadian Cattlemen’s Association (CCA) – of which Manitoba Beef Producers is a member – belongs to the Global Roundtable for Sustainable Beef. The focus is to ensure beef production is environmentally sound, socially responsible and economically viable. Other members of the Global Roundtable for Sustainable Beef include processors, retailers and environmental and sustainability organizations. As well, the CCA is involved with the Global Agenda for Action (GAA) in Support of Sustainable Livestock Sector Development, a United Nation’s Food and Agriculture Organization (FAO) led multi-stakeholder initiative.

The Beef Value Chain Round Table (which includes participation from the Government of Manitoba) has recently signaled its support for the development of a Canadian Sustainability Round Table that includes participation from producers, processors, retailers and civil society (e.g., environment focused non-governmental organizations). The goal of this new Round Table is to develop workable, market-based, solutions for the delivery of sustainability goals in the beef industry. It is critical to note that the definition of “sustainability” in these processes includes both economic sustainability and environmental sustainability.

Manitoba Beef Producers is making substantial investments of time and money into the development of sustainability issues and strategies because we know that by working together with all sections of the production web we will develop approaches that not only fulfill society’s environmental goals, but also accomplish these goals in a way that helps our industry grow and develop and continue to contribute significantly to Manitoba’s economy.

MBP also notes that many industries’ customers are also developing their own sustainability policies and objectives and requiring certain practices by their suppliers. This must be considered when developing legislation, regulation and policy in Manitoba. Many of these market-driven sustainability policies deal with the environmental aspects of production, some with animal care, some with labour practices, and so on.

The *Green Prosperity Act* and associated regulations and policies must be developed in a way that is complimentary to these national and international sustainability efforts. If Manitoba develops approaches in isolation that hinder the implementation of these national and international standards both the province’s sustainability goals as well as our provincial economy will be damaged.

The *Green Prosperity Act* should be developed in a way that is complimentary to the national and international market based approaches. For example, these initiatives will almost certainly be implemented at the ranch level through the use of programs like Verified Beef Production. Support for these kinds of programs should be considered in the development of the *Green Prosperity Act*.

Above all, Manitoba Beef Producers stresses the need for ongoing and active consultations on anything like sustainability agreements. If governments’ initiatives are developed in consultation and co-operation with industry they will be complementary to developing industry initiatives. However, if programs in Manitoba are developed in isolation or without adequate consideration of industry initiatives, our provincial efforts may actually inhibit the implementation and adoption of national and international initiatives. Not only would the

development of parallel (or even cross purpose) programs in Manitoba inhibit the achievement of our environmental goals they would also put our sector at a competitive disadvantage to the rest of Canada and to our international competitiveness. This will in turn drive investment and opportunity away from our province, threatening economic sustainability.

Manitoba Beef Producers makes investments in research aimed at helping ensure the long-term sustainability of our industry. A few examples of research projects in which MBP has been involved in include: the fertilizer equivalence of manure; residual feed intake; farm management strategies in the Canadian beef sector; and, developing a strategy for forage and grassland management in Manitoba through an examination of the multi-functionality of forages.

MBP also makes financial contributions to research undertaken through the Beef Cattle Research Council, a division of the CCA. Many of these research findings have implications for environmental sustainability. For example, improvements in feed efficiency means fewer days are needed to finish fed cattle, thereby reducing the amount of methane and manure produced and resources used. Moreover, productive grasslands and forages help sequester carbon, maintain healthy wetlands and provide biodiversity for a multitude of species.

Manitoba's beef producers remain committed to sustainability. However, MBP strongly maintains governments must be mindful that when contemplating new initiatives (like sustainability agreements) that many sectors already have their own internal sustainability strategies; they are adhering to a multitude of existing governmental requirements; and, they are adapting their practices to meet policies set out by their customers. Again, the importance of economic sustainability for all sectors cannot be understated when governments are contemplating adding new requirements.

Questions re: Multi-Year Sustainability Strategies (page 12):

Should government develop long-term strategies to address key environmental issues? What is an appropriate timeframe for long-term planning?

MBP believes provincial governments – present and future – have an obligation to develop long-term strategies to address key environmental issues; otherwise, they will be abdicating their responsibility. Strategies should be assessed at regular intervals to determine their effectiveness and updated accordingly.

MBP believes the timeframe for long-term planning should not be tied to governments' electoral cycles. Governments will change, but that does not preclude the need for long-term thinking in broad-ranging areas ranging from water policies, to energy management to the delivery of ecosystems services. Advances in science and technology may provide opportunities to address some issues more readily. However, governments must be prepared to make long-term financial and resource commitments to addressing environmental issues, particularly if these requirements are being made of business and industry.

Long term sustainability strategies must include co-operation and agreements with the governments of other jurisdictions. For example, the development of a long-term water management strategy for Manitoba has long been, and continues to be, a crucial focus for our members. An effective long-term water management strategy must include agreements with our neighbors to the west (Alberta and Saskatchewan), the south (North Dakota, South Dakota, Minnesota and Montana) and municipal governments.

The development of long-term strategies must also include effective and ongoing consultations with industry and other stakeholders, like Manitoba Beef Producers.

Developing long-term strategies can be a daunting task for any government. MBP suggest that an initial approach for the development of a long-term water strategy for our province could be the establishment of firm timelines and action plans for the process. MBP suggests that a body, like the Round Table, is ideally suited to take up the challenge of managing the process of the development of long-term strategies, including managing the necessary work with our neighbors and the required consultations with stakeholders.

Questions re: Reporting on Progress Towards Goals (page 12):

How would you like to see Manitoba report on its progress toward sustainability? What specific measures would be most meaningful?

The existing *Sustainable Development Act* requires the Manitoba Round Table for Sustainable Development to provide an annual report on its activities to the Minister. The Minister is required to table this report in the Manitoba Legislature within established parameters. There are also requirements regarding the preparation of Provincial Sustainability Reports and annual reports for the Sustainable Development Innovations Fund.

At the bare minimum, Manitoba Beef Producers believes there should be a comprehensive annual report and/or a detailed Provincial Sustainability Report prepared by a designated entity such as a lead department or a Round Table.

Manitoba Beef Producers believes the development of an annual sustainability report could provide both an opportunity for ongoing consultations as well as meeting society's expectations regarding accountability. MBP suggest that initial draft reports from the designated entity be circulated to stakeholders like MBP or those who have signed sustainability agreements, or an industry that is required to take action as a result of the provisions of the *Green Prosperity Act*. A timed comment period and face-to-face meetings with stakeholders on an annual basis would ensure that government is getting the feedback required.

Accountability would also be enhanced if all of the feedback received during the comment period were made publicly available along with the final report. In addition to being tabled in the Legislature, MBP believes these types of reports should be posted on the lead Ministry's website and other suitable government websites, as well as made available for circulation to public libraries. Other means of distribution and awareness should be considered as well, such as social media, to ensure the broadest public engagement possible.

At this time, MBP does not have a specific opinion on the type of performance measurement tools to be used in assessing progress in meeting the provincial government's sustainability objectives. Ideally the models selected are should be those that are being used in a number of jurisdictions in order to make for easier comparisons. It is critical that the Government of Manitoba consult extensively with stakeholders prior to the finalization of any performance measures.

It is however MBP's opinion that regardless of the assessment tools and reporting mechanisms used, they must be clearly explained and in a form that can be readily understood by the general public. This will help ensure ongoing public awareness of and support for sustainability strategies.

In addition to reporting progress on its sustainability initiatives, MBP believes the provincial government has an obligation to identify areas where its internal sustainability obligations and targets are not being met. Additionally, incidences of non-compliance by government departments, Crown corporations and agencies should be identified, as well as the corrective actions taken. This will help ensure greater accountability to Manitobans.

Should the provincial Budget Papers tabled in the legislature contain information about progress in achieving TomorrowNow – Manitoba’s Green Plan?

Yes, in the interest of public transparency and accountability, this information should be included in the provincial Budget Papers. However, MBP believes this step should not preclude other reporting mechanisms about the *Green Plan*, such as information provided in departmental annual reports, reports from round tables, etcetera.

In particular Manitoba Beef Producers holds that publication in the budget papers should not replace the publication of an annual sustainability report and the process of consultations on that report, which we have outlined in the previous section.

Questions re: New Fund to Replace the Sustainable Development Innovations Fund (page 14):

What priorities should the new fund address? What criteria would an effective funding program include?

Manitoba Beef Producers believes the existing objectives of the SDIF remain salient, but may need to be updated. As well, any future fund should be flexible enough to help provide support for research into emerging sustainability issues.

Whatever form a research future fund takes, MBP would like to see the focus on funding projects that are directly related to environmental sustainability, with an underlying focus on projects with linkages to economic sustainability.

For example, MBP notes that during the 2011/12 fiscal year funding from the SDIF was used for Manitoba Conservation’s Bear Smart Initiative. While this is a valuable initiative as it aims to protect people and wildlife, it is MBP’s opinion that funding for ongoing programs like this should come from the department’s annual operating budget and not the SDIF.

A significant number of projects have been funded since the SDIF’s inception. MBP suggests that moving forward efforts be made to maximize the value of the research gleaned from the funded projects. MBP asks whether any coordinated effort has been made to consolidate the findings of similar research projects.

For example, there have been several projects related to composting yet there are still challenges related to the rollout of composting initiatives in various communities and sectors around Manitoba. Similarly, it would be beneficial if a way can be found to ensure that research gleaned from projects under the SDIF goes from the theoretical stage to practical application wherever possible.

MBP notes that summaries have been provided of projects funded through the SDIF. In the future MBP asked that consideration be given to having more detailed project reports posted publically so they are more readily available for other researchers and the broader community to use when working on sustainability initiatives. MBP recognizes that some aspects of research may be proprietary and cannot be shared with the public.

MBP is interested to see a reference in the consultation document to funding for sustainability projects potentially being sourced through the use of agreements with private sector. MBP is not opposed to this approach as long as the funded projects meet the objectives and criteria of a future fund.

Manitoba Beef Producers notes that insufficient extension and technology transfer in research projects is often a reason why good research efforts do not have the practical impact that might have otherwise been expected. MBP suggests that SDIF project criteria include provisions for technology transfer and extension to key industry

stakeholders. MBP would be happy to meet with the Government of Manitoba to establish criteria for extension and technology transfer to the beef industry and beef producers.

Earlier sections of our brief have noted the development of market-based industry standards for sustainability. MBP believes that SDIF could be a useful tool to help ensure that these new initiatives are understood by producers and so that producers have the tools and capacity to readily adopt any specific initiatives that meet the needs of their individual operations. SDIF could help through support for research into furthering the scientific foundations for these developing industry standards as well as providing support for extension work and technology transfer to producers. Some adjustments may need to be made to SDIF to allow the program the flexibility to meet these needs.

Questions re: Final Comments (page 14):

Are there any elements that are missing from the new act as proposed? Please elaborate.
Do you have any additional comments on the new act as proposed?

In summary, Manitoba Beef Producers would like to reiterate the following key points:

1. The broad principles outlined will likely find wide acceptance with the citizens of Manitoba today. However, they may be too broad to facilitate the advancement of sustainability. For example, the concept of economic sustainability should be more explicitly part of the priorities outlined.
2. Any definition of “sustainability” must include “economic sustainability” as a key pillar. It is our assessment that this critical pillar is not adequately reflected in the consultation documents.

The inclusion of economic sustainability should be part of any act that is brought before the Manitoba Legislature and part of the evaluation mandate given to the co-ordinating body, no matter what form that body will take.

3. MBP believes that the proposed principles and guidelines for sustainability can, and should be, significantly revised. For emphasis, MBP strongly holds that the principles do not adequately reflect all pillar of “economic sustainability”. Other detailed proposals for revising the principles have been included in the main body of our brief.
4. MBP is concerned that the proposals represent a shift away from structured, evidence/science-based decision making on sustainability questions and towards a less-structured approach. This would result in greater business uncertainty and encourage the flow of capital to other regions.
5. MBP does not believe a new freestanding agency with an extensive bureaucracy should be established to achieve co-ordination of sustainability initiatives across government.
6. The required oversight of sustainability legislation and regulation could be achieved by retaining the Manitoba Round Table for Sustainable Development, or a similar type of entity.

Such a body should also have the ability to suggest corrective actions to departments and Cabinet if the government’s internal sustainability goals are not being met. The make-up of such a Round Table or similar entity should be structured to allow for participation by outside experts who can offer in-depth analysis on various elements of the government’s sustainability platform.

7. The Manitoba Round Table for Sustainable Development, or a similar type of entity, could also serve as an effective tool for public accountability and as a means of ensuring that the initiatives, goals and needs of all stakeholders are considered as sustainability initiatives are both established and evaluated.
8. MBP suggests that a review of new legislation be conducted regularly (e.g., within a three to five-year window). This review should include an opportunity for public consultation.
9. MBP believes that the new Act should include a requirement for a provincial sustainability report.
10. There are no references in the proposed purpose statement to a number of key principles contained in the existing *Sustainable Development Act* such as integration of environmental and economic decisions, prevention, or stewardship. In fact, the existing principle of stewardship is virtually eliminated in the proposed revised principles. MBP strongly believes that these shortcomings must be corrected prior to the introduction of legislation.
11. MBP believes that prevention and mitigation should be part of the legislation and should include active co-operation with governments of other jurisdictions.
12. While the consultation document holds the promise of the “green jobs” of tomorrow, we cannot lose sight of the jobs that are driving the economy today. New sustainability measures must be implemented in a way that mitigates any potential negative economic impact, to the greatest degree possible.
13. Manitoba Beef Producers reiterates that in order for our industry to be economically sustainable, comprehensive water management strategies are required in our province to address both the risk of flooding and drought. Co-operation with our neighbors in Canada and the United States will be integral to the success of these strategies.
14. MBP strongly maintains governments must be mindful that many sectors already have their own internal sustainability strategies; they are adhering to a multitude of existing governmental requirements; and, they are adapting their practices to meet policies set out by their customers. These factors must be taken into account when developing legislation, regulation, policy and specific initiatives. Again, the importance of economic sustainability for all sectors cannot be understated when governments are contemplating adding new requirements.
15. MBP suggests that a body, like the Round Table, is ideally suited to take up the challenge of managing the process of the development of long-term strategies, including managing the necessary work with our neighbors and the required consultations with stakeholders.
16. Manitoba Beef Producers believes the existing objectives of the SDIF remain salient, but may need to be updated. Any future fund should be flexible enough to help provide support for research into emerging sustainability issues and include a significant focus on extension and technology transfer.

Manitoba Beef Producers would like to participate in future consultations on the development of a *Green Prosperity Act* and similar legislation that has the potential to affect Manitoba’s beef industry. Thank you for the opportunity to participate in this consultative process.