NATIONAL CATTLE FEEDERS' ASSOCIATION
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Submission on the 2026-2029 Draft Federal Sustainable Development Strategy

Submitted by: National Cattle Feeders' Association

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Introduction

The National Cattle Feeders' Association (NCFA) appreciates the opportunity to provide input on this consultation and to contribute the perspective of Canada's cattle feeding sector. Feedlots play a vital role in supporting domestic food security, strengthening rural and regional economies, and sustaining Canada's position as a reliable supplier of high-quality beef in global markets. Feedlot operators are committed to continuous improvement in environmental stewardship, animal care, production efficiency, and responsible resource management. As governments advance sustainability and climate objectives, it is essential that policy approaches remain practical, science-based, and economically sustainable. Policies affecting livestock production must recognize the practical realities of cattle systems, acknowledge the significant stewardship and efficiency gains already achieved by producers, and ensure that Canadian operations remain globally competitive while continuing to invest in innovation and long-term sustainability.

Building an Inclusive and Resilient Society

Goal 1.1: Improve Confidence in Government

Within the agriculture sector, there has been an erosion of trust in institutions such as Pesticides Regulatory Directorate (PRD) and Canadian Food Inspection Agency (CFIA). We respect the authority of these organizations but feel there would be a benefit to including an increased economic lens on regulatory development.

Recommendation:

- **Move the CFIA animal health pieces that currently sit in Health Canada back to CFIA**
- **Ensure that Agriculture and Agri-Food Canada apply an economic lens to decision making processes, including potential trade impacts.**

Driving Clean Growth

Goal 2.1: Build a Productive and Low-Carbon Economy

Canadian beef production has become increasingly efficient over time, with feedlots producing more pounds of beef with less inputs than ever before. Feedlots require timely delivery of inputs as well as reliable access to both domestic and export markets for their end products. The main methods of transportation utilized are highway and rail, making our industry heavily dependent on infrastructure.

One of the by-products of beef production is manure, and there is currently an opportunity for feedlots to be part of the solution related to renewable energy production and reduced carbon emissions. Energy production through anaerobic digestion of cattle manure presents a significant opportunity for Canada's feedlot sector in terms of reducing our environmental footprint, generating revenue through sale of renewable energy and digestate, and lowering carbon emissions. Producing renewable energy from biomass begins with the anaerobic digestion of organic materials which includes livestock manure.

Recommendation:

- **Develop and maintain reliable and efficient transportation corridors, including rail access.**
- **Support growth of the renewable energy sector through development of biogas facilities and technology, renewable natural gas (RNG) markets and investment tax credits which drive further expansion of the sector and improve Canada's renewable energy productivity.**

Goal 2.2: Strengthen the Resilience and Sustainability of Canadian Agriculture

We applaud the outlined commitment to supporting agriculture through financial programs, risk management tools, and research and innovation. To ensure that these efforts are serving the industry effectively, the reality of evolving markets, increasing farm sizes and higher costs needs to be factored into these discussions. The future of Canadian agriculture and food security for Canadians depends on innovation and risk management programs which are timely and appropriately scalable as farm sizes and markets fluctuate.

Additionally, the risks of foreign diseases are increasing with our globalized economy; planning and preparedness are paramount to supporting resiliency when it comes to the potential entry of a foreign animal disease into Canada's national herd.

Lastly, the ongoing threats of tariffs and non-tariff trade barriers increase market volatility and create a high-risk environment for those involved in cattle feeding. Finding ways to reduce red tape around imports and exports, as well as helping the sector adapt to an evolving global trade environment, will support a healthier beef industry and increased food security for Canadians.

Recommendations:

- **Prioritize continuous improvement of business risk management programs and financing options which support the agriculture sector. This includes regular reviews to ensure program conditions are still reflecting the realities of the sector.**
- **Support research and innovation for agriculture to create a more efficient and competitive production system.**
- **Support export market development and Canada/US cross-border collaboration.**
- **Review programs, such as the Restricted Feeder Program, to determine if there can be changes which reduce red tape while still achieving the intended outcomes of the program.**

- **Support prevention and preparedness related to foreign animal diseases.**
- **Apply an economic lens on changes to regulatory and policy changes or new programs.**

Goal 2.5: Expand Access to Sustainable Transportation

Agricultural production occurs in rural areas which do not traditionally benefit from public transportation systems. While we appreciate the overall benefits of effective public transportation, development cannot be at the downfall of agricultural production. Development of transportation corridors or other related commitments should not impede agricultural operations, such as limiting access to fields or requiring excessive detours to reach existing land locations.

We strongly urge the government to avoid setting targets around electric vehicle adoption, or limitations around abilities to purchase internal combustion engine (ICE) vehicles. In rural areas and farm environments, limited charging stations and long operating hours during busy times of year mean that electric vehicles often are not practical or reliable to use. Restricting the availability of ICE vehicles would increase costs and negatively impact productivity for farming operations.

Recommendation:

- **Ensure that development plans for public transportation projects consider impacts on the agriculture sector, including economic impact.**
- **Ensure that initiatives such as ICE vehicle targets avoid unintended consequences which penalize those operating in agriculture or living in rural areas.**

Protecting Our Environment and Well-Being

Goal 3.1: Reduce Greenhouse Gas Emissions

Canadian agriculture is essential to the future of our country, contributing billions of dollars to the economy and supporting food security for our nation. Innovation, efficiency and sustainability drive growth in our sector and are at the forefront of the high-quality beef Canadian cattle feeders produce. As such, there have already been extensive reductions to greenhouse gas emissions for Canadian beef production, resulting in our beef being produced with an ***emissions footprint which is less than half of the global average***.

Our industry is multi-factorial and calculation of these numbers is complex, therefore determining these values on an individual on-farm level would be next to impossible. The Canadian Roundtable for Sustainable Beef commissioned the *National Beef Sustainability Assessment* based on metrics from 2014 and 2021, and is planning to continue measuring improvement in the industry. This report provides a valuation which represents beef production across Canada and is scientifically published, establishing it as a credible source which can be used by those reporting information on beef production.

When it comes to goals, the suggestion of setting emission reductions targets of 40-45% by 2030 and 45-50% by 2035 is very concerning for our sector. While we are open to embracing new technologies, there are currently limited opportunities to improve our emissions beyond what has already been achieved. Research on various methane-reduction products has demonstrated limited results and the long-term effects of some products are yet to be determined. Agricultural vehicles and equipment are also currently limited in their ability to adapt, as this equipment needs to be able to operate for long hours and distances without stopping to recharge. Transitioning to new equipment would be costly, and must not negatively impact productivity or animal welfare.

Recommendations:

- **Allow for scientifically validated metrics to be established at an industry level and recognized for the purpose of calculating and reporting emissions.**
- **Avoid implementing reporting requirements or red tape which will unnecessarily increase burden on agricultural producers or their supply chain partners. Provide exemptions for agriculture when required.**
- **Support innovation and incentivize adoption of solutions which effectively result in emissions reduction while maintaining current performance and production levels. This includes supporting research and providing financial incentives for adoption.**

Goal 3.3: Protect and Restore Canada's Ecosystems and Biodiversity

The Canadian beef sector depends on a variety of land types including everything from marginal pastures and forested areas to productive, irrigated cropland.

Setting targets for land conservation can have a multitude of unintended consequences for agricultural producers, and the continued commitment of 30% conservation by 2030 is concerning. There are a number of strategies to spur conservation which have been implemented in the past, some of which have negatively impacted land use and prices. Incentives for conservation can drive the price of land higher, making it unattainable for agricultural production and thereby reducing the production capacity of the land. This can, in turn, increase input costs on forage and grain for livestock, while also requiring these items to be hauled further distances and increasing the overall emissions footprint for agriculture. The end result will be increased food costs to consumers.

Wildlife conservation needs to include a balanced approach to ensure that it does not become a detriment as well. The implementation strategy outlining controls around imported wildlife species is appreciated, but there are often imbalances within our domestic wildlife populations which can impact agricultural production. For example, in some areas there are increasing populations of elk which cause excessive damage to feed supplies, or wolves and cougars which prey on livestock. Disease transmission is also a concern, and there needs to be a balanced approach in attempting to increase biodiversity that does not cause harm to the agricultural sector.

Recommendations:

- **Seek out collaborative solutions with agriculture to ensure that conservation efforts do not negatively impact the agriculture sector.**
- **Factor economic impacts and food security into biodiversity and conservation initiatives.**

Goal 3.4: Improve Water and Air Quality

Clean water is essential for agricultural production, whether being used for livestock or crops. Many provinces already operate with strict, scientifically sound regulatory requirements around air and water quality when it comes to intensive livestock production. Producers have designed their operations to achieve these provincial requirements and ensure they are complying and reporting as required.

Recommendations:

- **Provincial regulations and guidelines be respected, and provincial authorities remain the default oversight for agricultural water and air quality.**
- **Support research and innovation related to water and air quality in agriculture.**

Goal 3.5: Reduce and Manage Waste

Cattle feeders depend on plastics for many essential on-farm applications that support productivity, animal care, and operational efficiency. We recognize the importance of responsible stewardship of these materials and are committed to working with governments, recyclers, and industry partners to strengthen collection systems, improve recycling and recovery opportunities, and support practical end-of-life management solutions.

Recommendations:

- **Engage with industry to effectively support research, innovation, infrastructure and logistical requirements around recycling options for agricultural producers.**

Conclusion

NCFA supports a collaborative and balanced approach to sustainability policy that advances environmental objectives while maintaining a competitive, resilient, and economically viable livestock sector. Feedlot operators across the country remain committed partners in delivering environmental stewardship, economic growth, and food security. Future policies should prioritize practical and scalable innovation incentives, meaningful climate adaptation support alongside mitigation efforts, and streamlined regulatory frameworks that minimize unnecessary administrative burden. All of these need to be considered in conjunction with industry to ensure changes are impactful and do not cause unintended consequences. Continued investment in trade access, transportation infrastructure, and supply chain resiliency will remain critical to the long-term success and sustainability of Canada's beef sector.