



Alberta Grains

December 10, 2024

Alberta's Land Use Secretariat
12th floor, South Petroleum Plaza
9915 – 108 Street
Edmonton, Alberta
T5K 2G8

Re: South Saskatchewan Regional Plan 10-Year Review

To whom it may concern,

On behalf of Alberta Grains, we appreciate the opportunity to contribute to the 10-year review of the South Saskatchewan Regional Plan (SSRP). Alberta Grains is a farmer-funded and farmer-directed organization, representing over 18,000 wheat and barley farmers across Alberta. Guided by our mandate under the *Alberta Marketing of Agricultural Products Act*, we are committed to fostering the long-term economic sustainability of Alberta's wheat and barley producers through investments in research, agronomy, grower extension, market development, and government policy advocacy.

The South Saskatchewan Region is a cornerstone of Alberta's agriculture, hosting over 9,000 farms and 1.5 million acres of wheat and barley production in 2021, contributing to the region's more than \$10 billion in operating revenues. The region has proven its economic importance with robust primary production and a thriving agri-food industry.

Despite this success, challenges persist. High-quality farmland is being converted and fragmented, threatening agricultural viability. Over the past decade, the SSRP has made strides but has struggled to resolve land-use conflicts, particularly those involving renewable energy. Without stronger protections and clearer priorities for agriculture, the region's momentum is at risk.

Our submission highlights the need for measurable indicators to ensure accountability and track the plan's effectiveness. Farmers need to see the SSRP used consistently in land-use decisions, with strategies that protect agricultural land and prioritize sustainable growth. Strengthening alignment between the plan's strategies and its stated outcomes is essential for securing the future of farming in this vital region.

Thank you for considering our submission and we welcome the opportunity to discuss our recommendations further and collaborate on shaping policies that protect and enhance the agricultural industry. Please direct any follow-up questions to ssereda@albertagrains.com or 587.899.5299.

Sincerely,

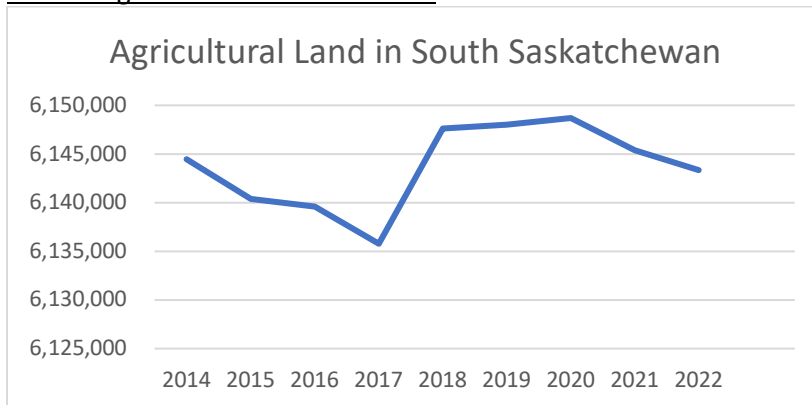
Shannon Sereda
Director, Government Relations, Policy & Markets

Section 1: Vision & Strategic Directions

How relevant is the SSRP Vision today?

The South Saskatchewan Regional Plan (SSRP) vision has supported the growth of the agricultural sector in the region. Wheat and barley cash receipts have increased to \$4.47 billion since 2014, marking a remarkable 100% increase. The region continues to play a vital role in Alberta's farming industry, with recent agricultural census data showing that the SSR now accounts for approximately 48% of Alberta's farm operating revenues and hosts an increasing share of the province's farms. To sustain this positive momentum, it is critical to ensure that agriculture remains a priority in regional planning.

Table 1 Agricultural Acres in the SSR



Source: <https://lufereporting-esrd.hub.arcgis.com/pages/ag-land-conversion>

Crop farming in Alberta is inherently land-intensive, making the management and reduction of competing land-use pressures essential for the continued success of agriculture in the South Saskatchewan region. As table 1 shows, The SSR has lost agricultural land but has been able to increase cropland acres. However, as the region grows, the risk of losing high-quality farmland becomes more tangible. Land-use change data from the Government of Alberta indicates a net loss of 9,174 hectares of LSRS (Land Suitability Rating System) class 2 to 5 farmland, which was somewhat offset by gains in less productive LSRS classes 6 and 7. This shift highlights the ongoing need for careful land-use planning to preserve high-quality agricultural land. Irrigation is a useful tool to help improve the productivity of these lands, but cannot always be a solution in improving lower quality acres, as accessibility is constrained due to high costs and limited water resources. Protecting high-quality farmland will be vital to the long-term economic success of the region's agriculture.

The SSRP vision mostly emphasizes primary industries, but it does not adequately address the growing importance of secondary industries such as agri-food manufacturing. This sector has become a cornerstone of the region's agricultural diversification strategy. For instance, Alberta has become Canada's leading potato producer, supported by the clustering of food processors within the SSR. Without this agri-food manufacturing hub, achieving diversification goals in agriculture would have been far more challenging.

Recognizing the current and future stakeholders in the region, including processors and other secondary industries, can enhance land-use planning and reduce conflicts. Proactively addressing the needs of all

sectors can ensure balanced growth and reinforce the SSRP's relevance in an evolving agricultural landscape.

How relevant and effective are the Strategic Directions to achieving the SSRP Vision?

The strategic directions outlined in the SSRP are broad, as expected, to address a wide range of goals. However, some are too vague to provide meaningful guidance to regional stakeholders, particularly in relation to achieving the SSRP vision. While the vision explicitly references economic sectors such as agriculture, these sectors are not clearly integrated into the strategic directions. To improve their relevance and effectiveness, the directions should better reflect the economic aspirations of the SSRP by emphasizing economic growth and balancing the competing needs of all sectors.

The first strategic direction, focusing on sustainable development, fairly emphasizes environmental and social outcomes. However, it could be strengthened by explicitly addressing the need to balance economic priorities. The agricultural sector faces continued land conversion pressures, but investments in research and extension services can help increase productivity within existing acres. Linking this to the principle of "promoting the efficient use of land" could ensure the direction better aligns with the economic and environmental needs of the region. Highlighting a balanced approach across human, agricultural, industrial, and conservation priorities would enhance the practicality of this direction.

Water management is another area requiring greater specificity. The Province's decision to halt new water licenses in the South Saskatchewan Region underscores the need for strategic guidance on managing water scarcity. The direction to "advance watershed management" is overly broad and lacks actionable language to address pressing concerns around water availability. A more explicit focus on balancing water allocations for human, irrigation, and industrial needs would better support the SSRP vision. Furthermore, the strategic directions could emphasize innovation in water-use efficiency to ensure the region's sustainability.

While the current strategic directions provide a useful framework, they could become more impactful by integrating clear economic goals, addressing sector-specific needs, and offering actionable steps to manage land and water resources effectively. These refinements would not only enhance the relevance of the SSRP but also ensure its strategic directions are more effective in achieving the region's vision.

Section 2: Economy

How effective are the Economic Objectives in achieving the SSRP Economy Outcome?

The economic objectives of the SSRP demonstrate a commitment to supporting agriculture, but their effectiveness in achieving the desired Economy Outcome is limited by inconsistencies and omissions. The Economy Outcome emphasizes growth, yet the stated objective for agriculture focuses on "maintaining and diversifying" the industry. This lack of alignment between the vision, outcome, and objective dilutes the plan's focus and could hinder its ability to effectively guide stakeholders toward shared goals. To ensure coherence and clarity, the objective should explicitly incorporate growth alongside maintenance and diversification.

Another area for improvement is the narrow framing of the agricultural objective. While the strategies

does not explicitly acknowledge the agri-food industry's contributions. Recognizing agri-food processing as part of the objective would reflect its critical role in economic growth and its capacity to drive expansion in primary agricultural production through value addition and export opportunities. This approach would mirror how energy and renewable energy are treated as separate but complementary objectives within the plan, providing a clearer framework for achieving the Economy Outcome.

How effective are the Strategies in achieving the SSRP Economic Objectives?

The strategies outlined in the SSRP aim to support the region's economic objectives; but their effectiveness can be improved with clearer alignment to the needs and realities of the agricultural sector. The agricultural industry is increasingly diversifying beyond traditional food production into biofuels and other industrial applications. Including these end-uses in the strategies would better reflect the sector's growth and diversification potential and its alignment with the broader economic goals of the SSRP.

We support the continued strategy of reducing land fragmentation and conversion. Adding monitoring land-use changes by LSRS classification is critical to ensuring that high-quality agricultural land remains available for farming. Farmers rely on productive land for sustainable operations, and the strategies should emphasize protecting these valuable resources. Alongside this, recognizing the importance of dryland farming in the region is crucial. As of 2021, the majority of crop acres in the SSR—approximately 55%—are dryland, compared to 45% that are irrigated. Strategies that account for this distinction will ensure that dryland farming is adequately supported and remains viable.

Certain strategies could also be more effectively categorized to improve their impact. For instance, Strategy 1.6, while potentially valuable for producers as a tool, would be better placed in the Environmental section under biodiversity and ecosystems. This strategy has limited direct relevance to achieving economic outcomes or diversifying the agriculture sector, and relocating it would clarify its purpose and strengthen the economic focus of the SSRP's strategies.

The metrics supporting the strategies also require improvement to ensure they effectively monitor progress and success. For example, the trade balance indicator does not provide a meaningful measurement of agricultural success. For crops like wheat and barley, where expanding exports is a key goal, a positive trade balance is optimal, but this metric does not provide sufficient context. A more useful indicator would be export totals for major crops, which are widely recognized as a measure of economic strength. Similarly, tracking the total number of acres in production, including both dryland and irrigated acres, would signal the resilience of the crop sector and further reveal if land conversion is affecting farming opportunities. Additional indicators such as the total number of farms, investments in agri-food processing, the number of agribusinesses in the region, and the regional crop mix would provide a clearer picture of economic and agricultural diversification.

Land-use conflicts between agriculture and renewable energy development also present a significant challenge. While some farmers are using renewable energy to power their operations, there is growing concern over the loss of high-quality farmland to renewable power plants. Over the past decade, strategies aimed at mitigating land-use conflict have not been fully successful. Alberta Grains recognizes the importance of incoming legislation to support orderly renewable energy development while protecting valuable farmland. Updating the strategies to reflect this legislation would help ensure renewable energy projects are located in areas that do not reduce agricultural opportunities.

In conclusion, while the SSRP strategies provide a foundation for supporting economic objectives, their effectiveness can be enhanced by addressing gaps and aligning them more closely with the agricultural sector's needs. Clearer objectives, improved indicators, and updated approaches to land-use conflict would strengthen the strategies and better support the region's economic goals.

Section 4: Biodiversity and Ecosystems

How effective are the Objectives in achieving the SSRP Biodiversity and Ecosystem Function Outcome?

The objectives within the SSRP related to Biodiversity and Ecosystem Function demonstrate a commitment to preserving natural systems. However, their effectiveness in achieving the desired outcome depends heavily on how they engage key stakeholders, particularly farmers, who are integral to the stewardship of the land.

Farmers have a vested interest in ensuring their lands remain productive and ecologically balanced for future generations. As stewards of the land, they have already adopted practices that contribute to biodiversity, soil and ecosystem health. To enhance the effectiveness of the SSRP objectives, it is essential that farmers are included and consulted as partners in achieving these goals rather than being subjected to top-down mandates. Empowering farmers as collaborators acknowledges their expertise and builds on their existing stewardship efforts.

The section on Private Lands rightly recognizes the importance of landowner involvement, but it must go beyond acknowledgment. Farmers' conservation efforts require tangible support, whether through educational programs, extension services, or financial incentives that make stewardship more accessible and sustainable. Initiatives like the ALUS wetland project provide an excellent model, where farmers are directly engaged in leading conservation solutions. Expanding such programs can encourage voluntary participation and foster innovative practices that align with biodiversity objectives.

Additionally, the phrasing in the second point under Private Lands, which states that “ecosystem services on private lands are identified,” may unintentionally alienate farmers. While farmers understand and value the benefits derived from ecosystems on their land, framing this as something external parties identify risks creating a disconnect. Instead, the language should emphasize collaboration, where farmers are supported in recognizing, enhancing, and restoring ecosystem services. This approach respects their expertise and ensures that biodiversity initiatives are implemented in ways that are practical and mutually beneficial.

Ultimately, the success of the SSRP's Biodiversity and Ecosystem Function objectives hinges on empowering farmers as active participants, providing them with the resources and autonomy to lead conservation efforts. By fostering collaboration and tailoring strategies to the realities of agricultural land use, the SSRP can effectively balance biodiversity goals with the practicalities of maintaining productive farmland.

How Effective are the Strategies in achieving the SSRP Biodiversity and Ecosystem Function Outcome?

The strategies outlined to achieve the SSRP Biodiversity and Ecosystem Function Outcome demonstrate varying levels of effectiveness, with some critical areas requiring updates and refinements. Recognizing

the use of voluntary and landowner-led programs is an essential aspect of these strategies. Empowering farmers to lead biodiversity and ecosystem initiatives ensures that these efforts are grounded in practical, on-the-ground knowledge. Adequate support for farmers in these programs is crucial to their success, as noted previously.

One area requiring immediate attention is the Southeast Alberta Conservation Offset Pilot strategy. Since the pilot phase has already been completed, the strategy must be updated to reflect its findings and transition towards a potential next step. This ensures continuity and relevance in addressing biodiversity goals.

In strategy 3.17, the emphasis on using extension services to help producers adopt beneficial management practices is commendable. However, declining funding for extension services presents a significant barrier, as it reduces opportunities for producers to gain access to critical knowledge and support. Additionally, regulatory hurdles, can hinder the adoption of innovative practices such as controlled tile drainage, which is vital for on-farm water management.

Soil health stands out as a vital component of sustainable farming and ecosystem health. Potentially incorporating soil health as an indicator at an aggregate level can provide valuable insights into the broader state of ecosystem health and its influence on agricultural productivity. A more robust focus on soil health could strengthen the strategies' alignment with long-term ecological and agricultural goals.

Section 5: Water

How effective are the Objectives in achieving the SSRP Water Outcome?

The objectives for achieving the SSRP Water Outcome reflect some important considerations but require refinement to address critical gaps and ensure comprehensive water management. While groundwater is mentioned in the preamble and included as a strategy, it is notably absent as a formal objective. This omission overlooks the essential role groundwater plays in meeting the needs of rural residents, who depend heavily on it for household water supply. Given its importance, groundwater protection should be elevated to an objective, emphasizing the need to safeguard its quality.

Managing water supply to support both healthy ecosystems and human needs is increasingly vital in the face of climate change. Forecasts suggest earlier snowmelt and drier summers highlight the need for sufficient storage capacity. There is evidence indicating that water allocations to Saskatchewan exceed mandated levels. These factors highlight the urgency of preparing for drier summers by managing incoming water flows more effectively to ensure future water availability aligns with demand. Including an objective based on water storage could effectively meet this need.

The challenge of balancing water distribution among agricultural, residential, and industrial needs is another critical concern. Population growth, irrigation, and economic development necessitate a reliable and sufficient water supply. While the current objectives under "efficient and resilient water supply" helps tackle these issues, they fall short of providing a comprehensive framework to address regional demands. In addition, continued emphasis on ongoing collaboration among stakeholders is crucial to guide water usage and ensure distribution that accommodates all users.

6 How effective are the Strategies in achieving the SSRP Water Objectives?

The strategies outlined under the SSRP for achieving water objectives offer valuable opportunities but face notable challenges that must be addressed to improve their overall effectiveness. Strategy 4.4, which focuses on improving wetland management, has raised concerns among producers due to its lack of clarity. The absence of measurable indicators makes it difficult to understand how this strategy will be implemented and evaluated. Additionally, farmers experience difficulties and red tape in distinguishing between ephemeral water and wetlands, as the policy's definitions often conflict with their practical understanding of their land. This misalignment hampers on-farm water management, leading to delayed seeding and waterlogging, which can result in significant economic losses.

The *Water for Life* strategy is a critical policy for enhancing water conservation and use across the province. Referenced in Strategy 4.11, recent reporting suggests progress has been made, particularly through efficiency improvements. For example, farmers have adopted new technologies and along with installation of water pipelines, helped increase irrigation efficiency to enable irrigation expansion by 192,000 acres since 2014. However, to remain effective in the face of evolving challenges, this strategy should be re-evaluated based on current circumstances with an emphasis on innovative practices that further enhance water sustainability.

The Water Management Plan for the SSRB is useful to support healthy waterways within the region. However, there are some concerns that the Water Management Plan and the Regional Plan at times are not properly integrated. There is concern that there is lack of coordination between the two, which will need to be reviewed to ensure enough water for a healthy ecosystems and users.

One promising innovation is the inclusion of water recycling practices. Promoting water reuse could significantly improve efficiency and availability, aligning with broader sustainability goals. Similarly, Strategy 4.10 emphasizes the importance of water storage as a tool to manage variability in water flow. Explicitly recognizing its role in meeting human needs and supporting irrigation would enhance regional resilience to fluctuating water availability and ensure better planning for long-term demands.

An additional gap in the current strategies is the absence of a focused approach to combat invasive species, such as zebra mussels. These species pose serious threats to water management systems, increasing operational costs for irrigation districts and the province. Developing a dedicated strategy to prevent and manage invasive species would help protect water infrastructure and reduce the economic burden on stakeholders.

In summary, while the SSRP strategies demonstrate potential, they require clearer indicators, greater alignment with stakeholders' needs, and the incorporation of innovative practices. Addressing gaps such as water recycling and invasive species management will be crucial to achieving the water objectives effectively. A more holistic and adaptive approach will ensure the region's water resources are managed sustainably for both current and future needs.

Do you have any suggestions to improve the effectiveness of the SSRP Water Indicators?

The SSRP water indicators offer valuable insights into water management practices, but there are significant gaps that limit their effectiveness in addressing the region's water challenges. One strong indicator currently in use is irrigation application efficiency, which provides measurable progress in how effectively water is used for crops. While this indicator is helpful, it does not fully capture the

motivations behind farmers adopting more efficient technologies. A key indicator is the number of irrigated acres, which has grown by 15% in irrigation districts since 2014. This growth demonstrates that investments in efficient irrigation technologies have been successful in reducing water demand and enabling expansion despite constraints on water licensing in the region.

However, the current suite of indicators lacks focus on water efficiency among other users beyond the agricultural sector. For instance, irrigation districts are sometimes required to release water from storage to maintain water quality after treated effluent is released into rivers by wastewater treatment plants. This raises concerns about whether all users are contributing equitably to water conservation efforts. Indicators that measure water efficiency across all sectors would help ensure accountability and reinforce the shared responsibility of managing this scarce resource.

Additionally, introducing a new indicator to track the percentage of water storage at year-end relative to winter storage targets would strengthen the monitoring framework. Such an indicator would provide insights into whether reservoir levels are meeting seasonal targets and help identify trends in water availability. This data could support planning efforts to mitigate the impacts of fluctuating water supplies due to climate variability and increasing demand.

Section 6: Efficient Use of Land

How could the effectiveness of the SSRP Efficient Use of Land Objective be improved?

The SSRP Efficient Use of Land Objective provides a framework for managing land development, but its effectiveness is hindered by vague language and unclear definitions. The terminology used within the objective and its accompanying explanation lacks precision, making it difficult for stakeholders to understand its implications fully. For instance, the SSRP document mentions examples of the built environment, such as urban and rural residential development, infrastructure, and recreational trails. However, it remains ambiguous whether farming—critical to the prairie economy—is considered part of the built environment. While the SSRP document states that the objective does not aim to halt growth and development, its emphasis on minimizing the land consumed by development raises concerns for crop farming, which relies on vast acreages with small profit margins. Ambiguities like these could inadvertently pose risks to farming operations and long-term agricultural productivity.

The objective's success in curbing land required for development is also questionable, as urban and rural residential expansion has increased by nearly 8,900 hectares since 2014. Urban sprawl not only consumes land but also intensifies competition for land resources, creating challenges for agriculture. Encouraging higher-density development could alleviate some of this competition, preserving more land for farming and other essential uses. However, the lack of measurable indicators tied to the objective limits its ability to address these concerns effectively.

How effective are the strategies in achieving the SSRP Efficient Use of Land Outcome and Objective?

The strategies outlined in the SSRP to support the Efficient Use of Land Outcome and Objective present valuable principles, but their effectiveness remains unclear. While the strategies emphasize minimizing land consumption through thoughtful planning, there is growing concern among stakeholders about urban sprawl and its impact on agriculture. Many members worry that urban expansion is encroaching on high-quality agricultural land, reducing the availability of prime farmland necessary for food

production. Without innovations or expanded access to irrigation to increase productivity on marginal lands, this trend risks undermining agricultural productivity and economic growth in the region.

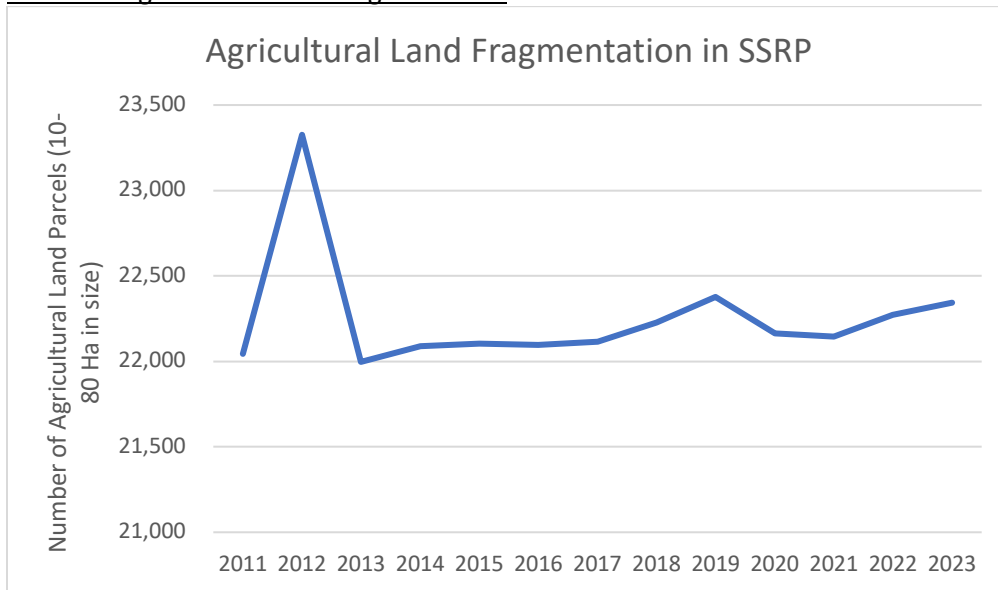
Data further suggests that prime agricultural land is disproportionately affected by development, highlighting a need for more targeted strategies to preserve these areas. However, the current regional dashboard lacks meaningful metrics or data to assess the effectiveness of these strategies, making it difficult to hold decision-makers accountable or track progress. The absence of measurable outcomes or transparent reporting creates uncertainty about whether the plan is achieving its goals of balancing development with the preservation of valuable agricultural resources.

Section 9: Community Development

How effective are the Strategies in achieving the SSRP Community Development Outcome and Objectives?

The SSRP strategies aimed at achieving the Community Development Outcome and Objectives present several valuable initiatives, but their effectiveness is hindered by the lack of measurable indicators to assess progress. While population size is a useful metric, it fails to provide a complete picture. Incorporating additional indicators, such as population density—especially in urban areas—could offer more meaningful insights into land-use patterns, urban sprawl, and the pressure on available land. These indicators would help track growth in a way that aligns with the objective of sustainable community development.

Table 2 – Agricultural Land Fragmentation



Source: <https://lufereporting-esrd.hub.arcgis.com/pages/ag-land-fragmentation>

In terms of agricultural strategies, while many are promising support for the sector, data suggests that there are troubling trends that undermine their effectiveness. For instance, land conversion (Table 1)—particularly of high-value LSRS land—and increasing land fragmentation (Table 2) continue to be issues. These trends threaten the sustainability of agricultural production, making it harder for farmers to

manage large, contiguous parcels of land, which are essential for efficient operations. The presence of such data indicates a gap between the intended objectives and actual outcomes, signaling that further intervention is needed to protect agricultural land. The strategies of “minimizing conflicts between agricultural land operations and incompatible land uses” and identifying areas for agriculture will be helpful in maintaining agricultural production.

Another concern lies in the trend of urban annexation. As cities expand, they often annex land from adjacent rural municipalities, creating challenges for maintaining agricultural integrity and preventing further fragmentation of rural lands. The current strategy does not adequately address this trend, and while no comprehensive data is available on annexation rates, records from the Land & Property Rights Tribunal's annexation board orders¹ show frequent instances of this practice. Although rural municipalities may focus on preserving agricultural areas, there appears to be no mechanism in place to prevent urban municipalities from requesting annexation of agricultural lands to meet their development needs. This lack of a clear policy on annexation undermines efforts to protect rural agricultural lands from urban encroachment.

Overall, while the strategies in place are useful and well-intentioned, their effectiveness is difficult to gauge without supporting data and more robust indicators. The absence of comprehensive metrics to track land-use changes, population density, and urban annexation undermines the ability to assess whether these strategies are truly achieving the intended outcomes of sustainable community development.

Section 11: Overall Feedback on the SSRP

The SSRP represents a promising framework with the potential to address critical issues such as land-use conflict. By fostering collaboration and providing strategic direction, the SSRP could play a significant role in balancing the competing demands on the region's land resources. However, its effectiveness is hindered by a lack of clear indicators to measure progress and ensure accountability. Without these indicators, it becomes challenging to evaluate whether the plan's outcomes are being achieved, leaving stakeholders uncertain about its impact.

From an agricultural perspective, the SSRP reflects both successes and challenges. On one hand, agriculture in the region remains a good news story. Cash receipts and productivity have continued to grow at a remarkable pace, underscoring the high-quality farming practices that characterize the region. These achievements highlight the strength and resilience of the agricultural sector. On the other hand, troubling trends have emerged over the years, including the conversion and fragmentation of agricultural land and a decline in the number of farms. While the sector has demonstrated strong momentum thus far, sustaining this progress over the next four decades will require deliberate and coordinated efforts to support farmers and protect farmland.

A significant concern within the SSRP is its ongoing struggle to address land-use conflicts, such as those arising from the development of renewable energy projects on agricultural land. These conflicts illustrate the complexity of decision-making, involving numerous government agencies and stakeholders. The lack of clear alignment between the SSRP and these decisions has raised questions about whether the regional plan is being effectively referenced or implemented. For instance, it took

10 ¹ <https://www.alberta.ca/annexation-board-orders>

over eight years before steps were taken to address land-use conflicts involving renewable energy development. While farmers are anticipating forthcoming legislation aimed at prioritizing agriculture, the delay underscores a gap in the SSRP's ability to proactively manage such conflicts.