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Ben Marcy  
Insurance Services  
Risk Management Agency  
U.S. Department of Agriculture

Dear Mr. Marcy:

The U.S. Canola Association (USCA) would like to share our perspectives and request the Risk Management Agency (RMA) consideration for changes regarding crop insurance for canola, including expanding the counties in which canola crop insurance is available, adjusting the final planting dates for Spring canola in the Northern Great Plains and Pacific Northwest, and adding a new category for omega-3 canola. Following is additional information on each of these requests.

**Expand Number of Counties in which Canola Crop Insurance is Available**

In Minnesota, expansion of crop insurance for canola to additional counties is a priority. Lack of crop insurance has been a barrier to greater expansion of canola production in Minnesota. Currently the oilseed crushing facility in Northwest Minnesota must import canola from Canada to run at capacity. We are requesting that the RMA return to the original counties in which crop insurance was available for canola in Minnesota (see attachment A). As shown in Attachment A, Minnesota originally had 24 counties in the program, however, around 2009/2010, nine counties (highlighted in orange in Attachment A) were removed. We urge the RMA to add those nine counties back to the program. There is existing production in some of those counties already and not having crop insurance is a barrier to expanding acres in these counties.

In Montana there is a need to establish insurance for winter canola. The current process requires growers to report seeding of winter canola, then wait for an assessment in the spring to confirm that the crop made it through winter, after which it can be insured as *spring* canola. We believe winter canola insurance would make a difference in planted acreage.

There are also investments being made and potential for increased winter canola production in regions such as the Great Plains (Oklahoma and Kansas) and the Southeast. Industry investments are providing processing capacity in those regions and winter canola has proven to be a viable and beneficial double-cropping option for growers. Lack of crop insurance is a barrier to production and while Written Agreements can be pursued, that option is less attractive to growers, crop insurance providers and administrators. We urge the RMA to identify counties in the Great Plains and Southeast in which canola crop insurance can be added.

**Adjust Canola Planting Dates**

We urge the RMA to consider changes to the final planting dates for spring canola in the Northern Plains and Pacific Northwest. Producers in this traditional canola growing region will play an important role in meeting the domestic demand for canola as well as anticipated increased demand for oilseeds as a renewable fuel feedstock. We believe it is important to update the risk management policies to help canola growers meet this demand. The current final planting dates can vary significantly over relatively small distances, with a May 15<sup>th</sup> deadline in McKenzie County, ND and a June 5<sup>th</sup> deadline just 35 miles away in Burke County, ND. Late planting due to excess moisture has become more common in the Northern Plains, putting canola growers in some areas at risk of not being able to plant before the deadline, or faced with difficult decisions and disincentives to plant.

As you know, these canola growing regions experienced very wet conditions during the 2022 Spring planting season, which threatened to significantly reduce plantings at a time when the world was suffering from limited supplies of food commodities, including vegetable oils. During that time, the USDA was searching for ways in which they could boost production to avoid further global food shortages. Likewise, the U.S. Canola Association proposed actions to revise requirements that might have led farmers to prematurely elect to take the prevent plant insurance option rather than plant their canola crop. Fortunately, commodity prices were so high and conditions improved enough to avoid a massive number of acres going unplanted. However, to avoid facing this situation in the future and give farmers more time to get their crop planted, we believe RMA should consider changes to the final plant dates for Spring canola in the northern tier region.

A simple and straightforward adjustment to the RMA final planting dates for spring canola would be to adjust them to match the current Spring Wheat final planting dates. This creates a more uniform date system, benefiting the farmer, processors, manufacturers, and consumers. Attachment B includes two maps showing the current final plant dates for Spring canola and Spring wheat in this region. The final plant dates have been in place for a number of years and seed improvements, technology, and production practices have improved over time.

In the past, North Dakota canola growers have sought changes in the final planting dates for certain counties. Minnesota canola growers have requested a final planting date of June 10<sup>th</sup> but the date has been set at June 5<sup>th</sup>. In some years the prevented plant date causes canola to lose acres to soybeans which has a final plant date of June 10<sup>th</sup>. Agronomically, there is little difference between the two to justify a 5-day later planting period for soybeans.

We believe the final plant dates for Spring canola could be extended without adversely impacting the crop insurance program. We believe this change presents minimal risk and we stand ready to provide any information or actions necessary to facilitate this change.

### **Omega-3 Canola**

The USCA supports the request for a new grower crop insurance category for omega-3 canola. Nuseed, a company that has developed omega-3 canola varieties, has presented the past 5 years of crop production data by County through the RMA Regional Office in Billings, MT. This additional category would provide growers more confidence to invest in production of omega-3 canola and prevent a growers commodity canola insurance from being negatively impacted by production differences between the different types. In the development of an omega-3 canola crop insurance category we would like to work with the RMA to ensure the new category does not negatively impact growers with lower yields from 1<sup>st</sup> generation varieties and/or drought years.

Thank you for your consideration of these issues and we look forward to further discussion.

Respectfully yours,

Andrew Moore, President