

What we heard at the National EFP Summit in Ottawa November 1-2

The National Environmental Farm Plan Summit was held at the Westin Hotel in downtown Ottawa on November 1-2, 2016. The Summit was a response to growing consumer-driven demand for sustainably sourced food. The Summit brought together the provincial and territorial Environmental Farm Plan (EFP) organizations from coast-to-coast along with the entire agri-food value chain. It showcased EFPs across Canada to stakeholders and demonstrated the effectiveness that a national program will have in highlighting the agriculture industry's commitment to producing food sustainably. Attendees (Appendix 1 – Participant List) learned more about how the EFP operates at the provincial and territorial levels as well as how it is currently being used in sector-specific sustainability programs. This informed a path forward to lay the groundwork for a national program as it relates to the requirements of buyers in Canada and around the world. All stakeholders from farm to fork have a desire to create a national program that meets the needs of producers who farm and ranch in a wide variety of agricultural climates, while at the same time ensuring consistency for buyers, regardless of where in Canada they source their product.

The Summit showcased the usefulness of the EFP program and offered attendees insights into current and future uses for the EFP (Appendix 2 – Agenda). At the Summit Reception on the evening of November 1st, Ron Bonnett, President of the Canadian Federation of Agriculture, (CFA) welcomed attendees and introduced representatives from Agriculture and Agri-Food Canada (AAFC), Mr. Pat Finnigan MP, (Miramichi-Grand Lake, New Brunswick) and Chair of the Standing Committee on Agriculture and Agri-Food, along with Mr. Jean-Claude Poissant, Parliamentary Secretary to the Minister of Agriculture and Agri-Food. Both AAFC representatives conveyed AAFC's support for the national initiative. As the Summit Reception Sponsor, Luke Harford, Beer Canada President, outlined some of the ambitious commitments that Beer Canada members have made with respect to sustainable sourcing and production practices.

On November 2nd the Summit opened with remarks from Erin Gowriluk, Summit Chair (Alberta Wheat Commission), followed by a brief history of EFP in Canada from Jamie Hewitt, Acting Deputy Director, AAFC, Environment Policy Division. Paul Watson, Alberta EFP Director (ARECA) followed with background information on how the national EFP would work in concert with the existing regional programs.

A common criticism of EFPs is that they are all different. However, the first panel, **Strength in Diversity: Provincial panel highlighting the unique features of select EFPs in Canada**, provided a different perspective. The panel highlighted the fact that the freedom to act on their own has allowed programs to explore avenues that seem most appropriate to them, many of which might have relevance to a national program. A panel that highlighted current uses of the EFP in sustainable sourcing programs followed.

The heart of the conference though, was the presentation of results from the EFP Benchmarking Study (Appendix 3 – Executive Summary); which compared the content within the various provincial EFPs. This industry-funded study demonstrated clearly that the EFPs across Canada were, perhaps, not as different as many thought. Differences were largely of degree rather than content (i.e. the same question might be asked in a different way). After lunch, Groupe Ageco conducted a demonstration of the Dairy Farms Plus tool; which inspired the possibilities for a National EFP online delivery and data collection platform. Fran Burr, Executive Director with the Canadian Roundtable for Sustainable Crops (CRSC) spoke to how an NEFP could help CRSC

achieve its goals as well as the role that the CRSC could play in coordinating sustainability efforts at the national level.

The Summit wrapped up with an open discussion facilitated by Ron Bonnett. This allowed time for reflection on the day's events. Participants were invited to respond to a series of questions to decide if a National EFP standard was a suitable route and then to provide the NEFP Steering Committee strategic and operational guidance.

A complete list of survey questions is presented (Appendix 4). A summary overview captures the following highlights:

1. Participants saw value in EFPs
2. Participants felt the National EFP Harmonization was worthwhile
3. Organizations felt it would be useful to them
4. EFP *could* cover other sustainability measurements (such as social and economic), but active engagement to obtain active support is desirable before proceeding beyond the environmental pillar.

Table 1. A summary of support for a National EFP standard

Question	Number responded	Yes (%)	No (%)	Not Sure (%)
Do you see the EFP as remaining a useful tool for producers now and in the future?	70	94.29	0.00	5.71
Do you support moving forward with the National EFP standardization process?	66	90.91	0.00	9.09
For your organization, does it make sense to develop baseline requirements for provinces/territories to meet for a National EFP standard?	68	85.29	0.00	14.71
Would you support expanding the EFP to look at other sustainability measurements?	67	53.73	14.93	31.34



A Letter from Erin Gowriluk, Summit Chair

It was an honour and a privilege to chair the NEFP Summit which not only served to showcase the many unique features of EFPs across Canada, it provided an effective forum to gauge cross-commodity, full-value chain support for the move toward a national program standard. This was reinforced by the very positive remarks offered at the November 1 Summit Reception by Mr. Pat Finnigan MP, (Miramichi-Grand Lake, New Brunswick) and Chair of the Standing Committee on Agriculture and Agri-Food, along with Mr. Jean-Claude Poissant, Parliamentary Secretary to the Minister of Agriculture and Agri-Food. Their remarks relayed the federal government's commitment to provide continued support for EFP as it harmonizes nationally to enable farmers and ranchers to better meet sustainable sourcing requirements here in Canada, and around the world.

The closing discussion led by our host and spokesperson farmer, Mr. Ron Bonnett, President of the Canadian Federation of Agriculture, explored a variety of opportunities for the National EFP including second- and third-party verification, the inclusion of social and economic indicators as well as a host of other issues that will be explored by the NEFP Steering Committee, once established in 2017. A clear area of almost unanimous (at 97% of participants polled) support was the creation of a national program that will ensure a consistent baseline standard to be reflected in-turn in every provincial and territorial EFP across Canada. This will make sourcing and assurance programs like the Dairy Farmers of Canada's ProAction consistent for all of its farmers across Canada and will provide assurance to companies like McCain Foods that potatoes, whether sourced in Prince Edward Island or Alberta, have all met a core set of outcomes-based indicators. The EFP would do all of this while allowing each jurisdiction to continue to deliver the extension and education required to promote the BMPs that make sense in their region. That's a win-win for farmers and industry.

What was also evidenced at the Summit was the tremendous recognition and trust that Canada's farming community has for the EFP. This is a program that was built by producers for producers and as a result, we saw support for the continued evolution of a program that has always provided producers with access to valuable resources including extension and education as well as the financial support to assist in the implementation of environmental BMPs.

On a personal note, the highlight of Chairing the Summit was getting to know many of the people involved in the delivery and design of this unique program as well as how well it stacks up against other international schemes – what an eye opening experience! I am so proud of Canada's EFP and look forward to being a part of this evolutionary process as we work to position this world-class program as Canada's sustainable sourcing solution. I hope you'll join me.

Best regards,

Erin K. Gowriluk
National Environmental Farm Plan Summit, Chair

A Call to Action

The Summit Steering Committee committed to overseeing the establishment of the NEFP Steering Committee so that implementation can commence in early 2017. The newly-formed Steering Committee will ensure broad and strategic representation from across Canada and oversee the creation of a forum to engage invested stakeholders. **We are committed to an inclusive and transparent process going forward and invite you to express your commitment to this work by contacting Paul Watson, Director of Alberta's EFP and Interim Steering Committee Chair (efp@areca.ab.ca, 708-224-0911).**

Preparing for Implementation

Establishing Partnerships

The NEFP will build on the EFP's strength as a producer-facing environmental sustainability program. Once established, the NEFP Steering Committee will develop partnerships with other commodity-based initiatives that seek to establish environmental and sustainability assurance with other members of the agri-food value chain. The federal, provincial and territorial governments will be invited to continue to play a critical supportive role, providing the necessary funding and technical expertise.

Building a Framework

Several key questions emerged from the Summit's plenary session that will need to be addressed before we can determine what the national model will look like. The newly-established Steering Committee will be tasked with considering the following questions:

1. What are the key parameters that will comprise the national standard (e.g. soil, water, air & climate, biodiversity, crop management, livestock management, manure management, waste management, etc.)?
2. How will data be collected and managed?
3. How will audits be conducted to verify continuous improvement?
4. What is the governance structure that will support the NEFP activity?
5. How will benefits of the NEFP be demonstrated to the agriculture sector and the public?

Table 2. Implementation Work Plan

Activity
<ul style="list-style-type: none"> • Implementation Work Plan
Stakeholder Engagement <ul style="list-style-type: none"> • Produce report from Summit and disseminate <ul style="list-style-type: none"> ◦ Invite participation from attendees and others • Convene current steering Committee and develop/finalize Terms of Reference for NEFP Stakeholder Committee (Draft ready) • Define in- and out of -scope for EFP Programs • Develop a governance model for the NEFP that recognizes the necessity of responding to external demands while preserving the regional integrity of the EFP program and process.
Define Environmental Principles <ul style="list-style-type: none"> • Iteratively define environmental standards based on a collaborative approach, consultation and industry definition • Establish criteria to form the baseline for what would constitute the National EFP, and therefore, environmental aspects of sustainable sourcing <ul style="list-style-type: none"> ◦ Develop a governance model for the NEFP standard that recognizes the necessity of responding to external demands while preserving the regional integrity of the EFP program and process
Funding the Future <ul style="list-style-type: none"> • There are 2 distinct funding streams for AAFC to consider under the next policy framework: (1) the costs for the development and delivery of the NEFP tool and core staffing and, (2) funding incentives to support BMP adoption by producers to improve environmental outcomes as is currently done through the EFP.

Funding the Future

There are two distinct funding streams for AAFC to consider under the next policy framework: (1) the costs for the development and delivery of the NEFP tool and core staffing and, (2) funding incentives to support BMP adoption by producers to improve environmental outcomes as is currently done through the EFP.

Stream 1 – Core operations

Further development of the PT EFPs as it builds on a significant pre-existing investment, by both producers and FPT governments. Core operations would include, but not be limited to the following.

Upgrades to PT EFPs.

- Changes to PT EFPs as required by industry and in order to meet the NEFP standard.
- Continued investment in development of effective online versions to meet producer needs, accommodate renewals support aggregation of data if necessary and improve documentation of outcomes.
- Technical upgrades
 - This would include the addition of components/modules where needed.
 - Uniform data collection, collation and reporting capacity across all PTs.

Staff

- The NEFP requires some support and core funding to operate. In addition to funding to support status quo delivery at the PT level, one full time position will be required to coordinate the large number of governments, producer organizations and other stakeholders to continue to move forward, develop and implement the NEFP standard. Building the needed structures, reporting, relationships, providing tangible benefits to Canada's agricultural value chain will need to be undertaken. Core functionality should be provided under the Next Policy Framework and industry/commodity/producer needs will be provided by in-kind or industry contributions.
- Scientific and technical advice as well as coordination support would be welcome from FPT governments.
- Moving to an online model will, over the long term, require less people. In the transition phase (2018-2023) more staff will likely be needed to simplify the process of moving online for producers. In reality, to meet the continued needs of all producers, it is likely that both hard copy and online versions of the workbook will be necessary through the years of the next policy framework.

Stream 2 – Funding Incentives

Cost-share incentives available through GF2 have been essential to drive participation in EFP and to move producers to continued adoption of environmental BMPs, but there is much more to be accomplished to meet provincial, national and international targets set by governments. We encourage greater federal investment into traditional and possibly new mechanisms to drive further BMP adoption (Appendix 5).

Building on the Legacy

One thing that we heard loud and clear at the November Summit was that the EFP's most important asset is trust. The EFP program was created by producers, for producers and enjoys a high level of trust and acceptance in Canada. As such, it is producers' preferred vehicle for delivery of agri-environmental content and funding to support adoption of environmental BMPs. The NEFP will retain the confidence of producers and producer groups by updating a well-known program with strong producer involvement throughout the process while bringing in the perspectives needed throughout the value chain and combining the right academic and governmental scientific and technical advice. As such, "membership" in the NEFP would be open, so as to hear all voices, but the NEFP would focus predominantly on operational implementation as opposed to determining what the value chain wants.

Appendix 1 List of participating organizations

ADM/Provision Coalition	Egg Farmers of Canada
Agricultural Alliance of New Brunswick	Fertilizer Canada
Agriculture and Agrifood Canada	Friends of the Greenbelt Foundation
Agrium	Government of Canada
Alberta Agriculture and Forestry	Grain Farmers of Ontario
Alberta Barley Commission	Grain Growers of Canada
Alberta Canola	Groupe AGÉCO
Alberta Farm Sustainability Extension Working Group	HSSA
Alberta Milk	Ingredion
Alberta Pulse Growers Commission	Ingredion Canada Corporation
Alberta Wheat Commission	Keystone Agricultural Producers
Alliance Agricole du NB	Logiag inc.
ALUS Canada	Manitoba Agriculture
ARECA	Manitoba Corn Growers Association
BC ARDCorp	McCain Foods Ltd
BC Dairy Association	Mercy For Animals
BC Dairy Association	Ministère de l'Agriculture, des Pêcheries et de l'Alimentation
BC Egg Marketing Board	Newfoundland and Labrador Federation of Agriculture
BC Fruit Growers' Association	Nova Scotia, Department of Agriculture
BC Grain Producers Association	NS Federation of Agriculture
BC Ministry of Agriculture	Ontario Federation of Agriculture
Beef Farmers of Ontario	Ontario Ministry of Agriculture, Food and Rural Affairs
Beer Canada	Ontario Soil and Crop Improvement Association
Burnbrae Farms Ltd	PEI Federation of Agriculture
Canadian Canola Growers Association	Pulse Canada
Canadian Cattlemen's Association	Richardson International Limited
Canadian Federation of Agriculture	Saskatchewan Wheat Development Commission
Canadian Forage and Grassland Association	SaskCanola
Chicken Farmers of Canada	Serecon
CleanFARMS Inc.	Soil Conservation Council of Canada
Coordination services-conseils	Starland County
CropLife Canada	Syngenta Canada
CRSC	Synthesis Agri-Food Network
Dairy Farmers of Canada	Union des Producteurs Agricoles
Dairy Farmers of Ontario	University of British Columbia
Dept. Fisheries, Forestry & Agrifoods (NL)	Viresco Solutions
Ducks Unlimited Canada	Water Policy Consultant
Egg Farmers of Alberta	Weston Foods

Appendix 2 AGENDA

Tuesday, November 1: Beer Canada Reception 6:00 – 9:00 PM

6:50 PM **Welcome: Setting the stage for the Summit**
Ron Bonnett, President, Canadian Federation of Agriculture

Opening Remarks from our sponsor: Beer Canada
Luke Harford, President, Beer Canada

Opening Remarks from Agriculture and Agri-Food Canada
Parliamentary Secretary Poissant (remarks in French)
MP Pat Finnigan, Chair of the House of Commons Standing Committee on Agriculture and Agri-Food (remarks in English)

Wednesday, November 2: Conference 7:30AM – 4:30 PM

7:30 – 8:30 AM Registration & McCain Foods Breakfast

8:30 – 8:40 AM **Welcome:** Erin Gowriluk, Summit Chair, Alberta Wheat Commission

8:40 – 9:00 AM **Toward a National EFP:** A brief presentation on the history of Canada's EFP and the importance of a national program
Jamie Hewitt, Acting Deputy Director, Agriculture and Agri-Food Canada, Environment Policy Division

9:00 – 9:10 AM **Establishing a Framework:** The integration of national indicators into regionally-based programs
Paul Watson, Alberta Environmental Farm Plan Director (ARECA)

9:10 – 10:40 AM **Strength in Diversity:** Provincial panel highlighting the unique features of select EFPs in Canada
Facilitator: Andrew Graham, Executive Director, OSCIA

Panelists

British Columbia: Geoff Hughes-Games	The EFP “Brand”
Alberta: Paul Watson	Protecting Species at Risk
Ontario: Andrew Graham	The Sustainable Farm & Food Initiative
New Brunswick: John Russell	Confidentiality
Prince Edward Island: JoAnn Pineau	Online Delivery

Note: Each speaker will present for 10-15 minutes followed by a facilitated Q & A.

10:40 – 11:00 AM Viresco Solutions Refreshment Break

11:00 – 12:00 PM

Why the EFP? A panel explores how the EFP can be used as a stand-alone program or integrated into a broader suite of sustainability programming.

Facilitator: Mike Slomp, Manager, Industry and Member Services, Alberta Milk

Panelists

Eric Ritchie, McCain Foods	Potato Sustainability Initiative
Cheryl Schroeder, Dairy Farmers of Canada	proAction®
Candace Vinke, Viresco Solutions	McDonald's Sustainable Beef Pilot

Note: Each speaker will present for 10-15 minutes followed by a facilitated Q & A.

12:00 – 12:15 PM

“Steward of the Land” Sponsor: Why sustainability matters to the Alberta Farm Sustainability Extension Working Group
Jolene Noble, Program Coordinator

12:15 – 1:30 PM

Weston Foods Lunch

Lunch Feature 1:00 – 1:30 Dairy Farms + Demonstration

Jean-Michel Couture, Director Corporate Responsibility Projects, Groupe AGÉCO

1:30 – 2:15 PM

Results of Provincial and Territorial Benchmarking Project

Paul Watson, Alberta Environmental Farm Plan Director (ARECA) Markus Weber, Serecon

2:15 – 2:45 PM **Seeking Synergies:** The CRSC & the NEFP

Fran Burr, Executive Director, Canadian Roundtable for Sustainable Crops

2:45 – 3:05 PM

“Steward of the Land” Sponsor: Integrating 4R Nutrient Management and the Canadian Field Print Calculator into the EFP: An Alberta pilot
Michelle Nutting, Manager, Agriculture Sustainability, Agrium
Denis Tremorin, Director of Sustainability, Pulse Canada

3:05 – 3:25 PM

Serecon Refreshment Break

3:25 – 4:30 PM

Next Steps: A facilitated discussion with real time feedback on the path forward.
Ron Bonnett, President, Canadian Federation of Agriculture

Appendix 3: Executive Summary (NEFP Benchmarking)

Canada currently has excellent geographic coverage as each of its provinces and the Yukon Territory have an Environmental Farm Plan (EFP). However, the various plans are not necessarily identical, as each has been developed somewhat separately and is presumably well-tuned to the specific circumstances of farm operations in that province.

There may be a need to harmonize the plans to some degree to document that a Canadian producer meets the expectations of certain requirements of food supply chains such as sustainability programs. For that purpose, it may be beneficial to present compliance or participation in a national framework of EFP's, rather than just compliance or participation in the producer's provincial plan.

This National EFP Benchmarking project was conducted with strong participation of the coordinators of EFP programs from all ten provinces and the Yukon, to examine whether it might be possible to harmonize their jurisdictional EFP programs. Serecon Inc., an independent consulting firm, was engaged with the following stated objectives:

- Provide an independent analysis that benchmarks which themes and BMP categories are covered by the various programs and;
- Document the programs' similarities and differences, documenting the status quo in such a way that it facilitates potentially bringing the various plans together.

Given the sheer volume of information contained in the various EFP program documents, the first task the project undertook was to create a categorization scheme that would allow for reasonable comparison between the programs. Through an iterative process, the project established a number of key themes that exist across most jurisdictions:

- Water
- Air & Climate
- Soil
- Biodiversity
- Crop Management
- Livestock Management
- Manure Management
- Other

The overall purpose of this project was to find commonalities amongst Canada's EFP programs, with a view to identifying gaps that would need to be filled to harmonize, while accommodating regional circumstances or realities.

These eight "themes" were then broken down further into 24 "topics". For example, there were three topic areas under the Water theme: Surface and Ground Water, Waste Water, and Water Use Efficiency.

Ultimately, the individual EFP programs establish many risk factors or metrics and recommend numerous actions and beneficial management practices to the producer. These are too numerous and too distinct to allow for comparison at that level, that would still provide oversight of commonalities. However, it was decided that the “topics” could be further broken down by aggregating the metrics to 59 “concerns”. For example, the topic of Surface Water included concerns around Water Wells and Stream, Ditch & Floodplain Management

Finally, while the primary purpose was to simply establish the presence of absence of coverage by each of the EFP programs, the project team also undertook an evaluation of how comprehensively each of the programs dealt with each of those concerns, using the following rating scale, explained in detail in the full report:

- 0 – absent
- 1 – mentioned
- 2 – some guidance
- 3 – detailed guidance
- 4 - comprehensive

While undertaking the initial review, the project team included any unique concerns that existed in a province’s EFP program. In conducting the full evaluation, it was determined for a number of those that they were quite unique to only a few or even just a single program. Of all of the concerns/risks, 17 were found to be addressed by seven or fewer jurisdictions. Of those, seven concerns were addressed by three or fewer provincial programs. These do not necessarily indicate a problem or even a gap, as many of these are unique simply by decisions made in the way EFP programs were designed or the way concerns were presented.

However, the project also found that the majority of concerns were quite uniformly addressed by most jurisdictions. In fact, 21 concerns were addressed to some degree by each and every one of the provinces and the Yukon. A further 21 concerns were addressed by almost all of the programs (with almost being defined as only one to three provinces not dealing explicitly with the issue).

The report outlines detailed findings, including identifying to what degree each of the provincial plans deals with each of the 59 concerns. It identifies clearly which provincial plans do not explicitly address a concern. That does not necessarily mean that the plan is deficient in any way, because this is often based on the fact that the issue may not be relevant given regional differences in agricultural production and environmental realities. In addition, EFP programs have taken different approaches to how an issue may be addressed, by dealing with the matter by focusing on beneficial management practices rather than explicitly dealing with the impact or outcome.

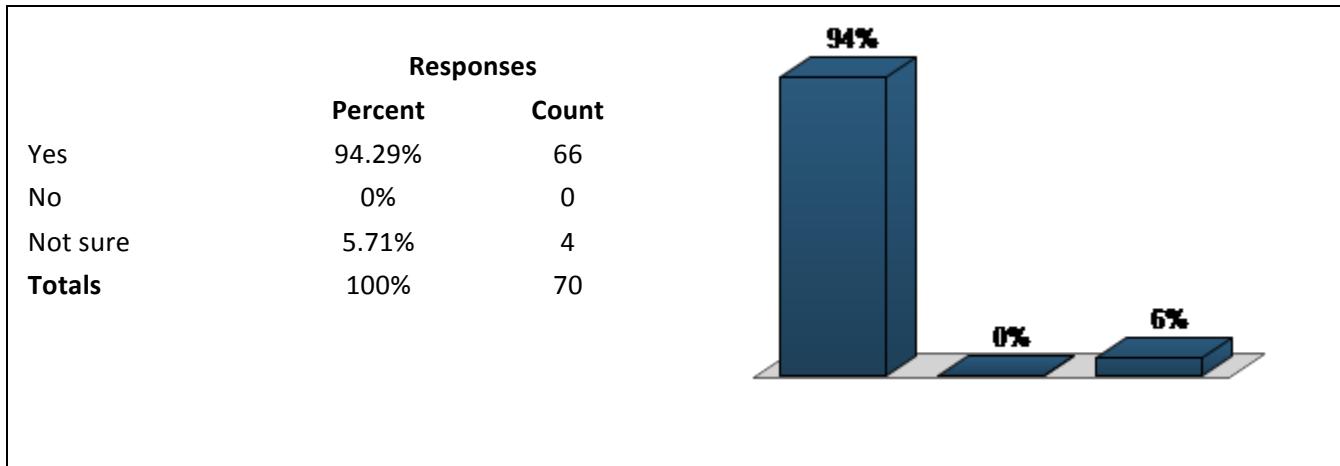
The table below provides a summary of those areas where strongest commonality was found in that all or almost all provincial EFP programs deal with those matters.

Theme	Concern covered by ALL eleven reviewed jurisdictions	Concern covered by <i>almost</i> ALL (8 or more) jurisdictions
Water	<ul style="list-style-type: none"> • Water Wells • Stream, Ditch and Floodplain Management • Irrigation 	<ul style="list-style-type: none"> • Farm Wastewater / Washwater • Treatment of Household Wastewater • Water Use Efficiency
Air & Climate		<ul style="list-style-type: none"> • Energy Efficiency • Open Burning • Odour
Soil	<ul style="list-style-type: none"> • Water Erosion • Tillage Erosion • Soil Nutrients • Soil Structure 	<ul style="list-style-type: none"> • Field Windbreaks • Farmstead Windbreaks
Biodiversity	<ul style="list-style-type: none"> • Non-Cultivated Lands • Wetlands and Ponds 	<ul style="list-style-type: none"> • Riparian Areas
Crop Management	<ul style="list-style-type: none"> • Crop Rotation • Managing Nutrients in Growing Crops • Pest Management • Greenhouse Crops • Pesticide Handling and Storage 	<ul style="list-style-type: none"> • Seeding • Equipment Maintenance • Field Horticultural Crops • Fertilizer Handling and Storage • Storage of Petroleum Products
Livestock Management	<ul style="list-style-type: none"> • Intensive Livestock Operations • Pasture & Grazing Management 	<ul style="list-style-type: none"> • Livestock Wintering Sites • Storage and Feeding of Silage • Disposal of Livestock Mortalities • Veterinary Materials Waste
Manure Management	<ul style="list-style-type: none"> • Structure of Manure Storage Facilities • Composting • Nutrient Management Planning • Application Methods 	<ul style="list-style-type: none"> • Manure Handling and Transport
Other	<ul style="list-style-type: none"> • Disposal of Inorganic Farm Waste 	<ul style="list-style-type: none"> • Nuisances and Normal Farm Practices • Emergency Planning

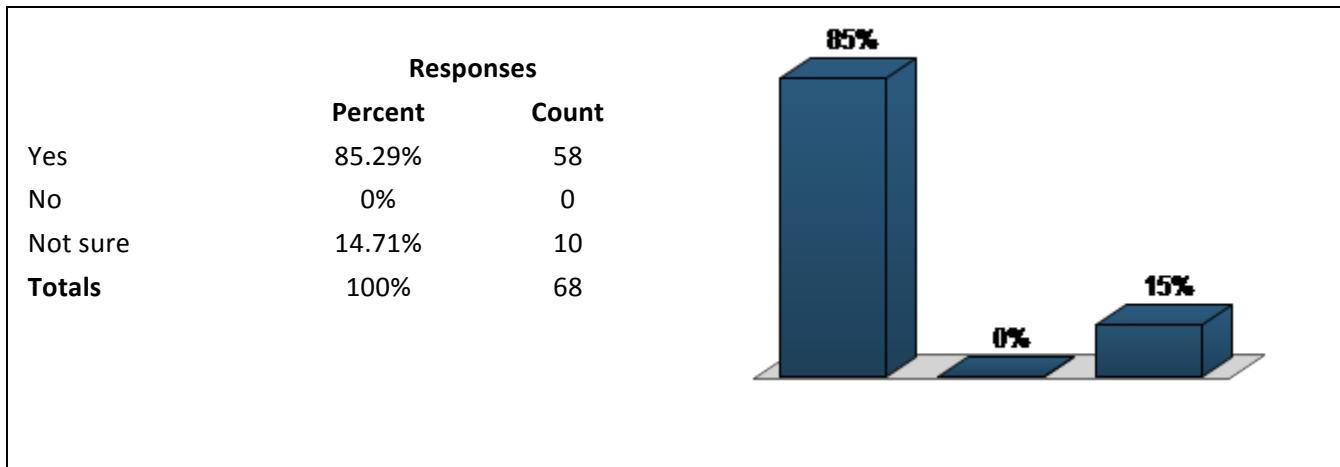
Appendix 4: Survey Questions

Results by Question

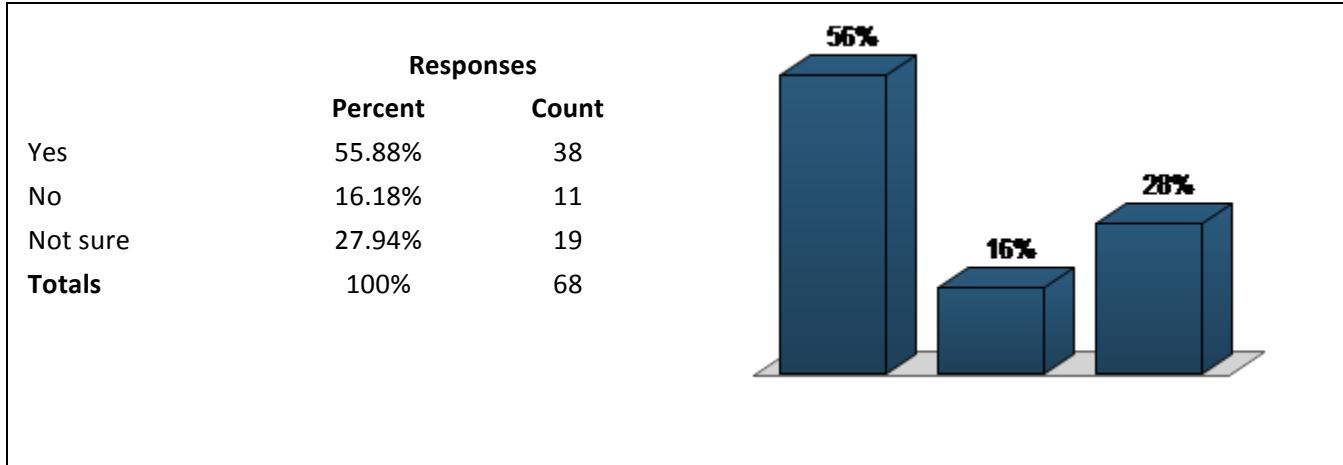
1. Do you see the EFP as remaining a useful tool for producers now and in the future? (Multiple Choice)



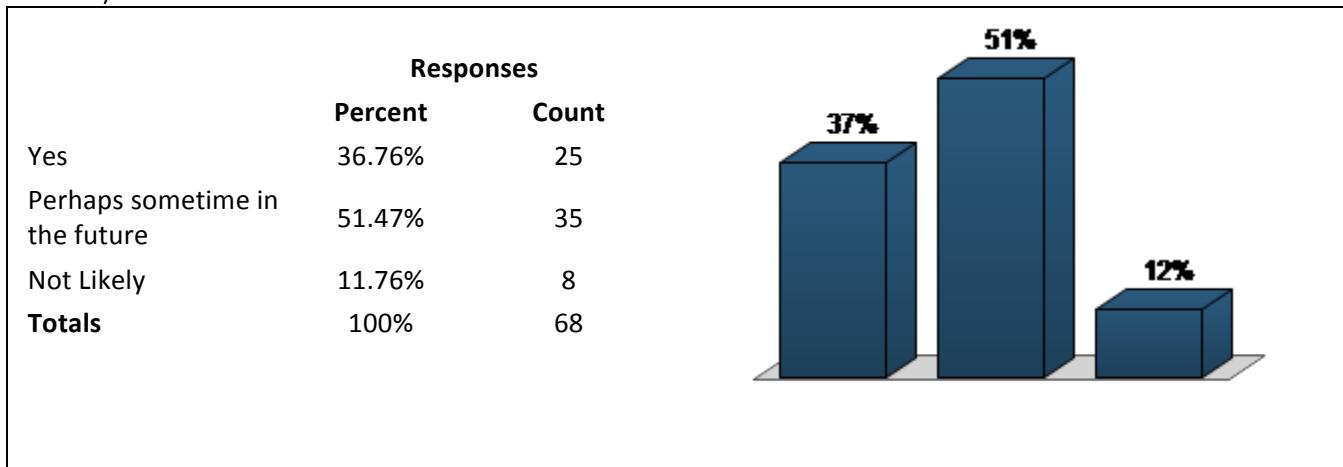
2. For your organization, does it make sense to develop baseline requirements for provinces/territories to meet for a National EFP standard? (Multiple Choice)



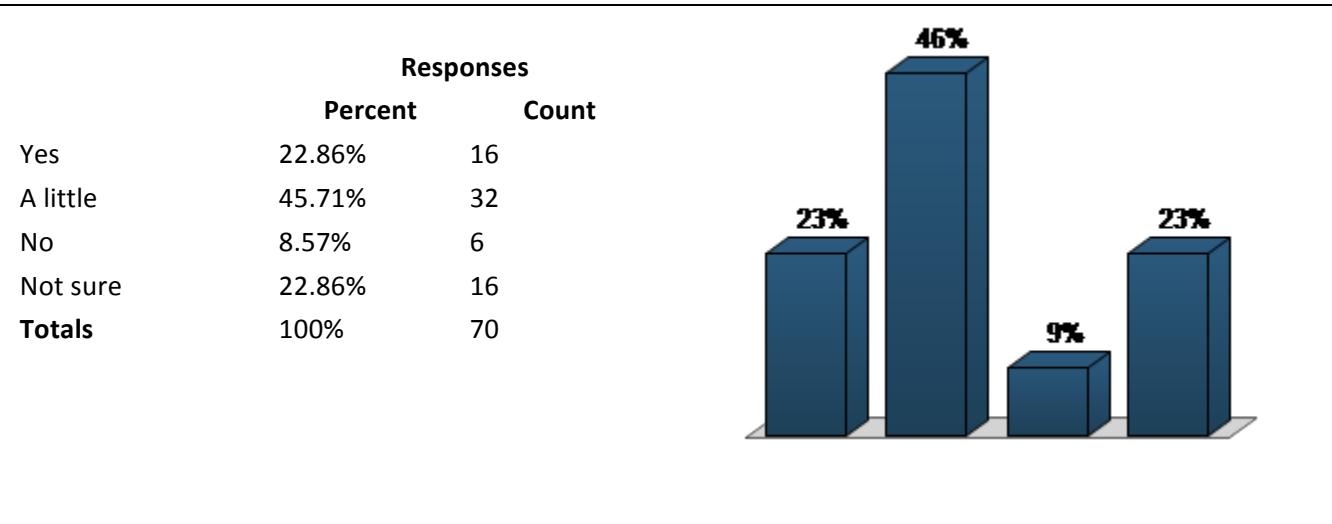
3. Would you consider it important to include some sort of on-farm verification within the National EFP standard? (Multiple Choice)



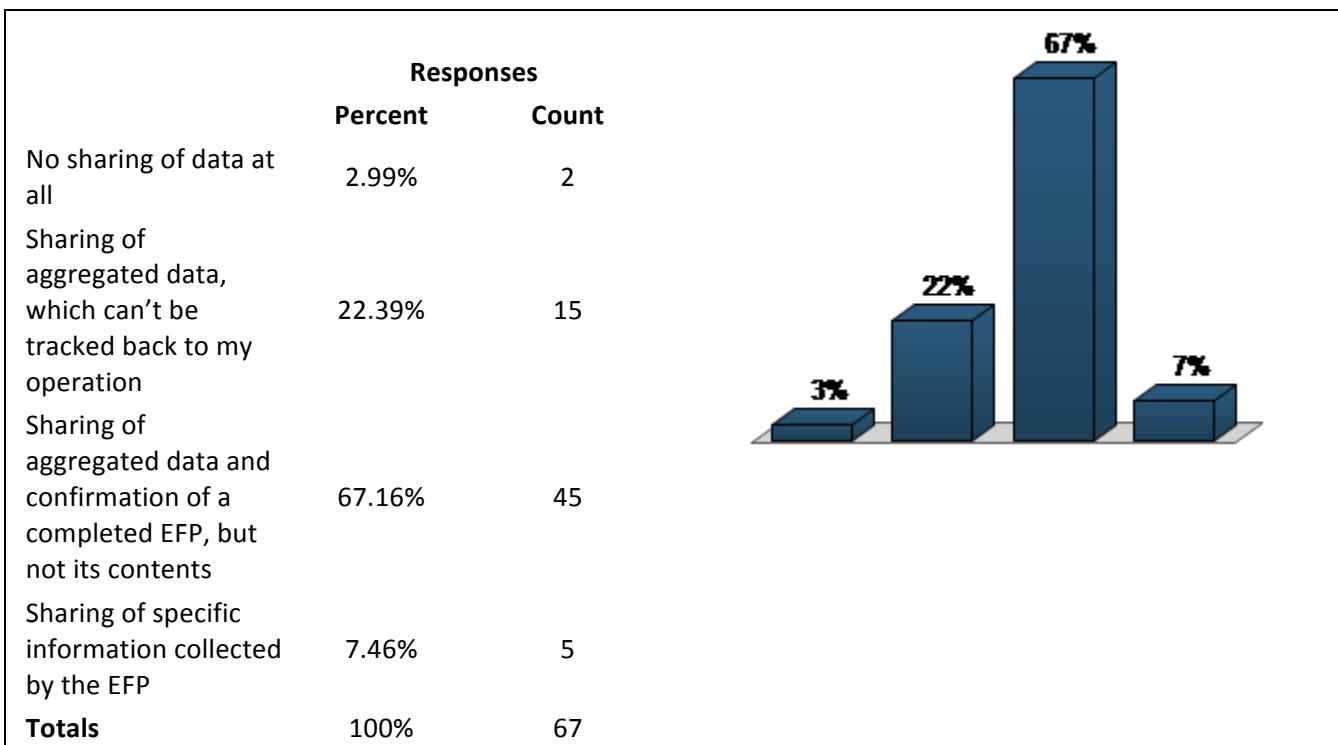
4. Do you see the National EFP standard as providing environmental assurance for the supply chain? (Multiple Choice)



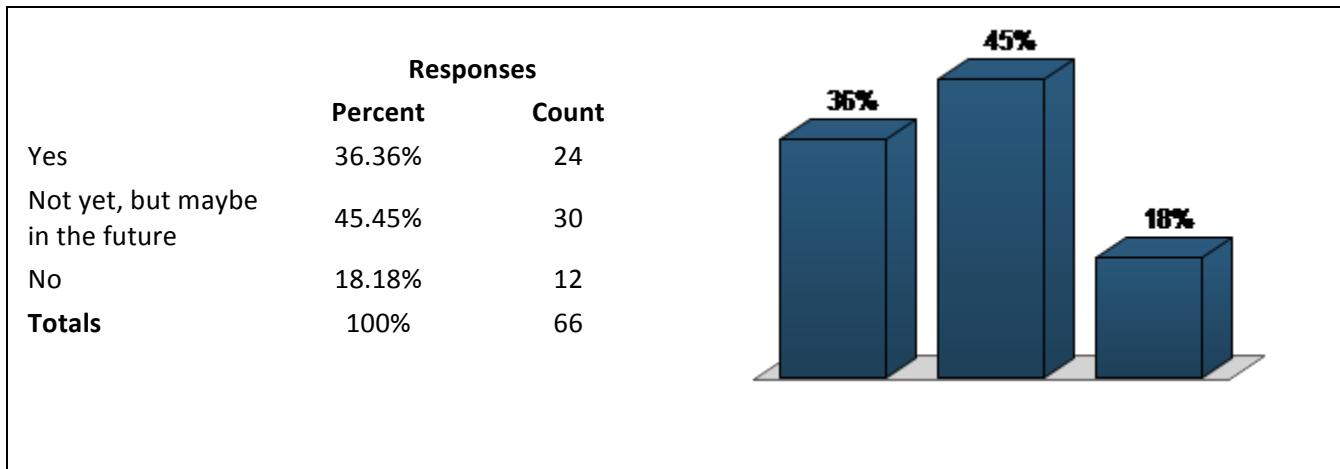
5. Will producers be ready to accept the sharing of some information in order to meet sustainability programs? (Multiple Choice)



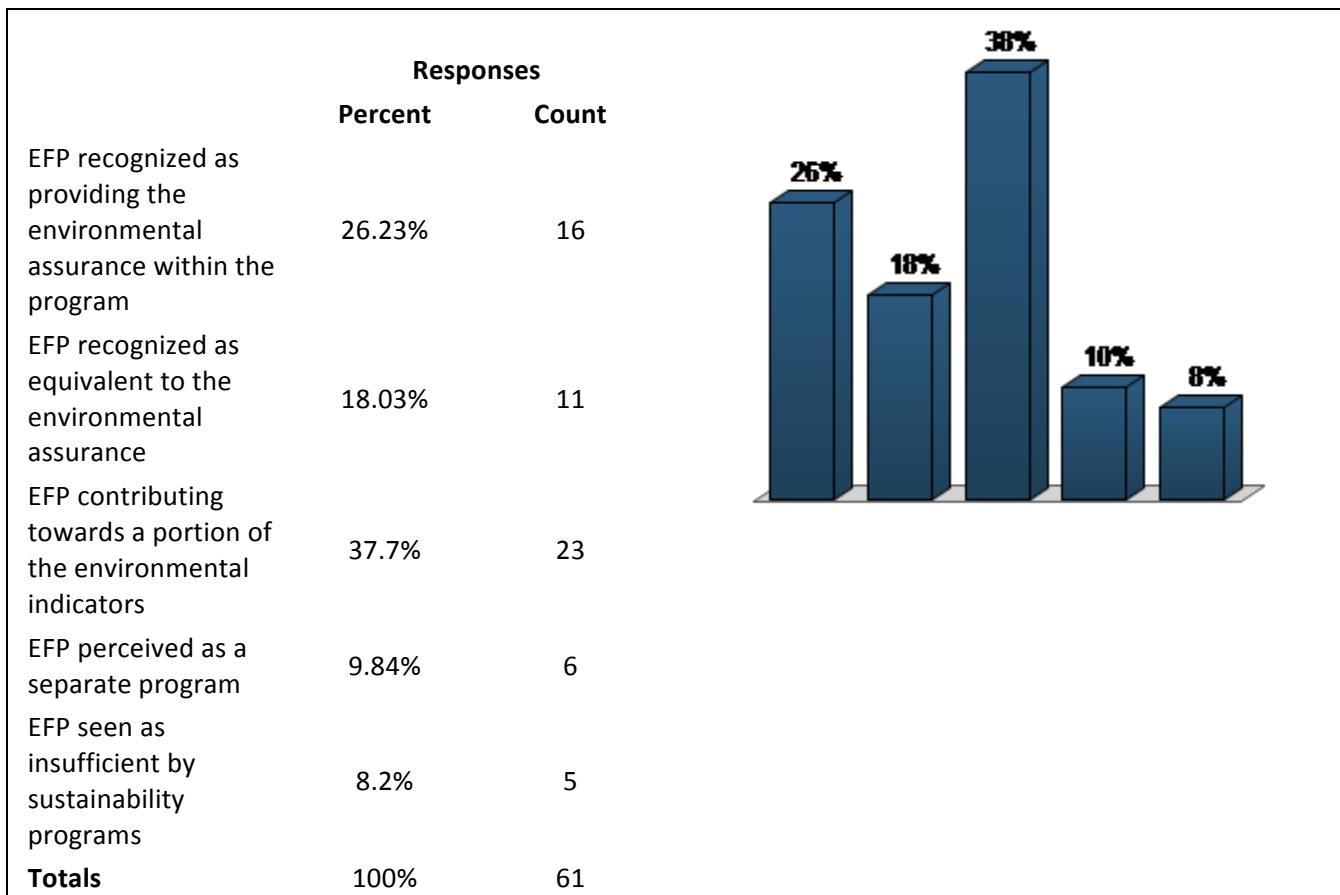
6. In your opinion, what level of confidentiality should remain? (Multiple Choice)



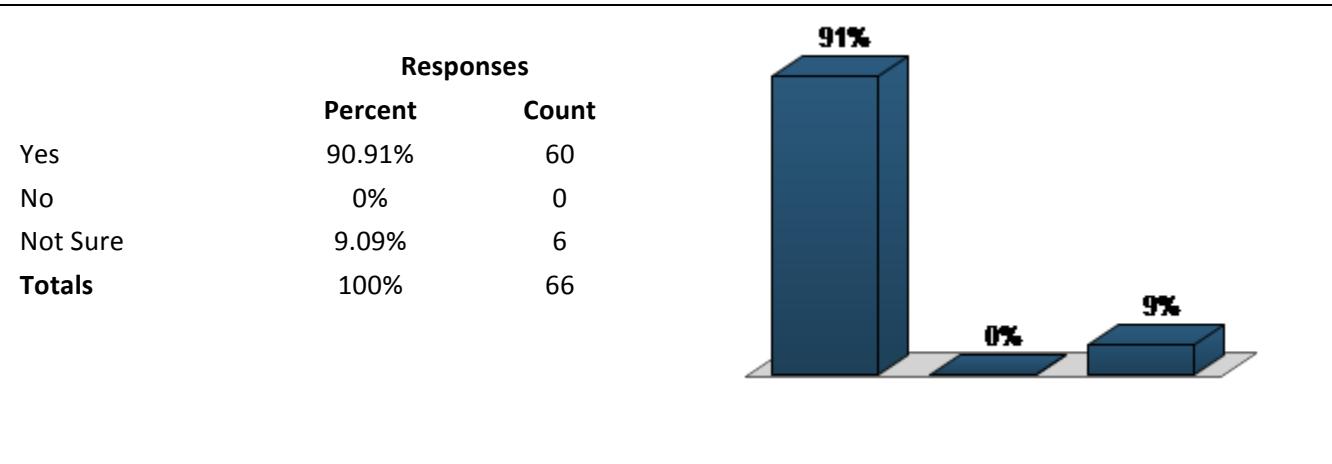
7. Do you feel supply chains are ready to support the EFP and contribute to the process to develop the National EFP standard? (Multiple Choice)



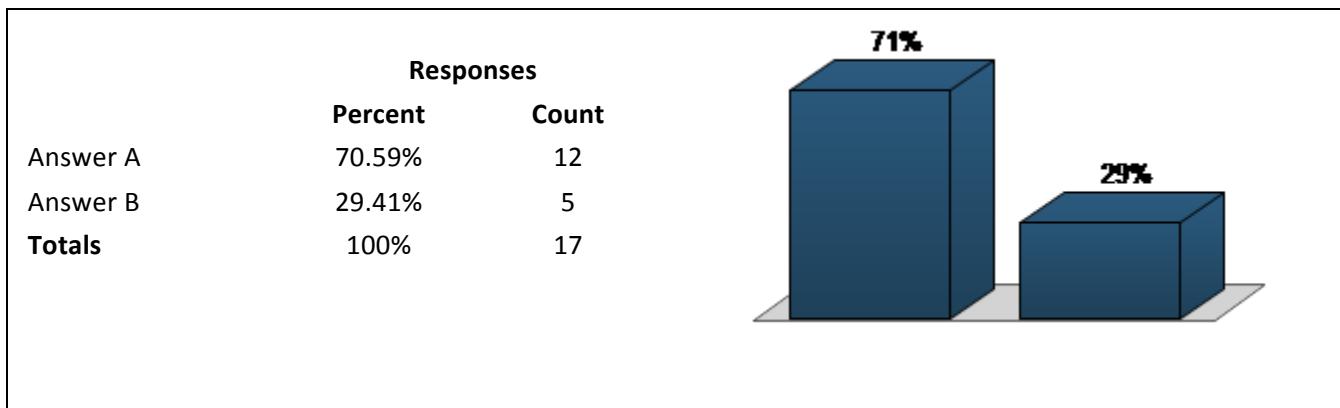
8. To what degree do you see the EFP being integrated into other sustainability programs? (Multiple Choice)



9. Do you support moving forward with the National EFP standardization process? (Multiple Choice)



10. Please make your selection... (Multiple Choice)



11. Would you support expanding the EFP to look at other sustainability measurements. (Multiple Choice)

Responses		
	Percent	Count
Yes	53.73%	36
No	14.93%	10
Not sure	31.34%	21
Totals	100%	67

