

Comments to CFIA Regarding Compliance Promotion

Based in Ottawa, Ontario, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies that are active in the marketing of fresh fruits and vegetables in Canada from the farm gate to the dinner plate. CPMA members cover various industries, integrating all segments of the fresh produce industry, including major growers, shippers, packers and marketers; importers and exporters; transportation and logistics, brokers, distributors and wholesalers; retailers, fresh cuts and foodservice distributors, operators and processors. CPMA is proud to represent over 790 domestic and international members who are responsible for 90% of the fresh fruit and vegetables sales in Canada.

CPMA and its members strongly support the regulatory modernization efforts as part of the Safe Food for Canadians Act and offer the following comments:

- 1) How could enhanced compliance promotion efforts in the following areas improve industry's ability to meet regulatory requirements?

Education

- Providing enhanced education through various means (media, webinars, CFIA -led training sessions, on-line information, social media, outreach at industry events, etc.) will all help to enhance the knowledge base and understanding of the requirements regulated parties must meet.
- Guidance documents (with inclusion of sector specific information developed in consultation with stakeholders will support information provided through other means).

Technical Assistance

- Technical assistance, such as interactive tools provided by CFIA, would increase the ability to comply with regulations and the administrative requirements of licensing, registration, etc. This will be particularly useful for small businesses with limited resources [financial, and other].
- Personal assistance should also be made available to industry to provide consistent interpretation where necessary.

Transparent Communication

- Posting of compliance and enforcement may provide information for consumers to make choice, but must not have the unintended consequence of causing a lack of confidence in a particular product or sector of the supply chain.

Compliance Incentives

- Incentives can be an effective means of producing compliance particularly where food safety is not an issue.
 - Proactive means such as education and assistance as mentioned above will further enhance compliance.
 - Punitive measures should be reserved for the most severe cases of non-compliance.
- 2) What should be the role of industry, government and third parties in contributing to an effective compliance management continuum?
- A joint effort will contribute to increased compliance. Industry, in many sectors, have developed standards and food safety management systems (based on international standards) – government recognition and support of these systems should continue. Third parties (industry associations, educational institutions etc.), with their broad range of expertise, can assist government in providing the necessary tools and fora for providing guidance, education and training.
- 3) What are the opportunities for collaboration?
- There are many opportunities as mentioned in the previous sectors for government and industry to collaborate on providing assistance, education and support to enhance compliance.
 - Collaboration on a national and international level : government support for industry-led and government recognized third-party audited food safety schemes such as CanadaGAP, along with international food safety standardization efforts or acceptance of equivalency, will ensure adequate resources are available to monitor and enforce regulations to guarantee food safety requirements are being met.