

Comments to CFIA Regarding an Outcome-Based Approach

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. What do you like about the outcome-based approach?

- Regulations are not prescriptive but rather the outcomes are regulated.
- An outcome-based approach allows regulated parties to adjust to methods of achieving the outcomes described in the regulations and provides flexibility to adjust methods of achieving the outcomes to allow for technological and scientifically validated innovations.
- Allows for adoption of international standards and equivalencies which lead to fewer trade barriers and ultimately increased food safety and food security.

2. What are your concerns, and how might they be addressed?

- Regulations should apply to all operations regardless of size of operation, origin, or growing methodology.
- Regulations should not be so onerous as to negatively impact the ability of the produce industry to provide a variety of produce, in both packaged and bulk formats, to Canadian consumers.
- Engagement of stakeholders when developing regulations and tools – Early engagement of stakeholder for input to development of regulations, guidance information and tools.
- Consistency of enforcement – Every effort should be made to influence all jurisdictions in Canada to align regulations and policies with those of the federal government.

- Consistency of outcomes aligned with trading partners and international standards – Recognition of national and international standards and establishment of equivalencies where possible.

3. Given that the Agency aims to increase use of the outcome-based approach where appropriate, what is industry's readiness to move in this direction?

- Government should be working with industry to ensure readiness and ability to comply with new regulations.