



Pat Finnigan, Chair
Standing Committee on Agriculture and Agri-food
House of Commons
Ottawa, ON K1A 0A6

June 16, 2021

Dear Mr. Finnigan and Committee members,

On behalf of the Canadian Produce Marketing Association (CPMA) and Canada's fresh fruit and vegetable industry, I am pleased to share our comments regarding the House of Commons Standing Committee on Agriculture and Agri-food study on the environmental contribution of agriculture.

The fresh fruit and vegetable sector supports the Food Policy for Canada's commitment to the promotion of long-term social, cultural, environmental and economic sustainability. Canada has been fortunate that the worst-case scenarios for our food supply have not been realized during the pandemic, but this renewed focus on our food supply chain is an opportunity to better understand the instrumental role our food system plays in contributing to a healthy economy and a healthy population. Partnerships with federal and provincial governments can position the industry for long-term sustainability as we strive to recover from the economic impacts of the COVID-19 pandemic.

CPMA and the fresh fruit and vegetable sector recognize that a sustainable environment is essential to the future viability and growth of our industry and Canada as a whole, and are supportive of the Government of Canada's efforts to address climate change under the Pan-Canadian Framework on Clean Growth and Climate Change and to foster Canada's post-COVID economic recovery through clean growth. We are also supportive of the Government's stated commitment to supporting the agricultural sector as key partners in tackling climate change and promoting environmental sustainability.

It should be noted that the agricultural sector is on the front lines when it comes to facing the challenges of a changing climate and environmental sustainability. We are working to ensure the economic viability of our sector and the wellbeing of the people and the planet that support it. Indeed, growers and others along the supply chain have led the way in adopting environmentally sustainable practices.

- In Ontario's Holland Marsh region, growers have implemented a variety of practices to increase carbon sequestration, such as: planting grasses and flowers on dykes/berms, cover cropping in-between revenue crops, planting cover crops on headlands and end rows, establishing grassy areas on boundaries, and planting trees along roadways.
- Highline Mushrooms has implemented an 82% waste diversion rate, water reduction and a reduction in the use of all fungicides and pesticides.
- CF Fresh has added rooftop solar panels that generate 42% of their electricity.
- Greenhouse growers have made significant moves to clean technology and carbon sequestration, including through measures such as utilizing carbon capture technology, sending by-products of

the growing process to anaerobic digestors, and implementing infrastructure to enable energy cogeneration up to 5 times more efficient than traditional energy production.

A Global Lens for Global Challenges – International Standardization, Harmonization and Benchmarking

CPMA would like to emphasize that international standardization between government bodies is critical to the success of the fresh produce sector, which is one of the most complex and integrated supply chains in the world.

In any efforts to harmonize and standardize between governments, it is essential that government also considers the existing international standardization integrated in business. Where business has developed international/global standards – standards tested by commercial application – government must ensure that, wherever possible, the standards it chooses to implement in services and solutions reflect those business-driven and tested standards. To achieve this, **as the Government of Canada considers new solutions, a key piece of that effort should be early engagement with industry stakeholders to understand the standards which already exist and have been implemented throughout international supply chains.**

Across the agri-food sector, ambitious targets are being set to reduce the environmental footprint of producing and supplying food. Proof of sustainability is increasingly required to compete at home and abroad in an industry that is expected to show progress toward environmental and other societal outcomes. Metrics and benchmarks are being increasingly deployed to operate, compete, and contribute to economic viability in this rapidly changing agri-food world.

Momentum is building to establish Canada's first agri-food sustainability index. A private-public coalition of thirty-four diverse partners including CPMA, has released the [Business Case for Establishing the National Index on Agri-Food Performance](#) to affirm Canada's agri-food leadership in a more demanding food world. The proposed National Index on Agri-Food Performance will be based on globally acceptable metrics relevant to Canada's agri-food context, with a strong link to work occurring in other jurisdictions around the world.

As a partner in the National Index on Agri-Food Performance, CPMA is appreciative of the Government of Canada's support of this initiative and urges the government to continue this critical engagement with stakeholders to achieve our common sustainability goals and secure Canada's position as a global leader in agri-food sustainability.

Reducing our Carbon Emissions

The fruit and vegetable industry is a major contributor to job creation and Canada's GDP and will continue in this role as we move toward a low carbon economy, but the Government of Canada must put in place policies and programs to support the ongoing growth of the industry. In particular, the Government must provide greater recognition for the efforts of the agricultural sector to reduce greenhouse gas emissions (GHGs) and implement more environmentally sustainable practices, including in the development of any carbon offset system.

CPMA strongly urges the federal government to work closely with industry stakeholders on a sector-by-sector basis within agriculture to further develop the details of its protocol for sustainable agricultural land management activities that reduce GHG emissions and enhance soil carbon sequestration on agricultural lands. Consultation and collaboration with industry stakeholders is necessary to ensure that the federal government's protocol reflects the different realities of each sector. In addition, the protocol must be designed in such a way as to allow for the necessary flexibility to be able to adapt to advancements in GHG reduction practices, reporting and other technologies, so that the carbon offset credit system can support the best available science on an ongoing basis, without requiring continual regulatory amendments.

CPMA would also like to reiterate that Canadian fruit and vegetable growers have been implementing environmentally sustainable practices for many years, with benefits to carbon sequestration in Canada. The fresh fruit and vegetable sector should not be "penalized" for being leaders in the reduction of GHGs and carbon sequestration. Instead, in order to provide reasonable and fair recognition for these efforts, **the Government should consider applying a retroactive lens in the determination of the project baselines to be used in its protocol, and should allow for previous projects to be eligible for offset credits if the project meets the necessary reporting criteria and can demonstrate its positive impact on GHG reduction and/or carbon sequestration.**

The Government of Canada should therefore draw upon the expertise of industry across various agricultural sectors to avoid unintentional errors in the development of regulations resulting from a lack of industry-specific knowledge. As the Government looks to develop its protocol for sustainable agricultural land management activities that reduce GHG emissions and enhance soil carbon sequestration on agricultural lands, **CPMA strongly recommends that the Government create a series of industry-government task forces to determine the most effective ways to achieve carbon sequestration goals on a sector-by-sector basis within Canadian agriculture.**

Tools to Support Sustainable Food Production in Canada

CPMA would also like to emphasize the importance of ensuring that fresh fruit and vegetable producers have access to, and can utilize, products and processes that ensure the sustainability of the industry and support food security, the lack of which can lead to unintended negative consequences on Canada's ability to meet our sustainability goals. **Given the linkages between sustainable production and the ability to decrease GHGs, the Government of Canada should take a holistic view of how supporting a sustainable agri-food industry complements environmental targets.**

We would like to reiterate the vital role that crop protection tools play in protecting our food and crops from invading weeds, insects, and disease. Particularly as we mark the UN International Year of Fruits and Vegetables in 2021, it is imperative that we recognize the essential contribution of crop protection tools to the fresh fruit and vegetable sector.

We acknowledge that pesticides must be used within the guidelines of good agricultural practices, which consider the needs of environmental quality and human health, as well as agricultural stability and effective pest management. The fresh produce industry has a long history of Integrated Pest Management (IPM) implementation, and given that many producers not just farm, but also live on the land where

production occurs, they pay close attention to the crop protection tools used to ensure that crops can be brought to harvest safely.

In Canada, the pesticide approval process used is one of the toughest in the world and meets or exceeds the health standards established by the World Health Organization. It is also important to recognize that for many years, crop protection in Canada has included the widespread adoption of IPM on fruit and vegetable farms. Constant monitoring of crops supports decision making, including in the use of pest control products. Pesticides are not liberally applied; instead, application is guided by sophisticated data sets to maximize output and support sustainability of the land that farmers steward.

In the fresh produce sector, production methodologies are rapidly improving and innovating – for some, like the greenhouse sector, this includes using minimal amounts of pest control products and a reliance on IPM tools such as beneficials like insects and/or fungi that are active against pests. Innovation and rapid growth in growing environments such as vertical farming is also another type of production which has changed the use patterns of crop protection tools.

At the same time, it is a global reality that much of fresh produce production will remain in a natural setting which will continue by its very location to be susceptible to insects, pests, invasive species, and disease, and the priority of all governments must be food security for the global population. Conventional production, as opposed to other production such as organic, will continue to represent the vast majority of global outputs of fresh fruit and vegetables and without the tools to ensure products reach harvest, well-intentioned efforts could result in devastating impacts to their availability. As an example, [CropLife Canada estimates](#) that 72% more fruit and 83% more vegetables can be grown every year by farmers in Canada than could be produced without the use of PPPs.

A 2019 [Royal Bank of Canada \(RBC\) report](#) found that with the right combination of skills, capital and technology, agriculture could add \$11 billion to Canada's GDP by 2030, but the same report also found that Canada's share of global agtech investment is only 3.4%, falling behind countries such as Brazil and India. **CPMA emphasizes that the Canadian fresh fruit and vegetable sector needs access to global advancements in agricultural biotechnology. These tools can not only contribute to our competitiveness on the world stage, but can support efforts to reach Canada's sustainability targets.**

In fact, [CropLife Canada estimates](#) that 50% more Canadian farmland would be needed to grow what we do today without pesticides and biotech crops – a land area equivalent to the combined area of the provinces of New Brunswick, Nova Scotia and Prince Edward Island. Increased land use that threatens natural habitats, wildlife and potentially biodiversity is of concern to the global community. **The Government of Canada should take an integrated approach to responsible and sustainable production, especially as countries work to adopt the UN Sustainable Development Goals and as Canada seeks to meet its own terrestrial conservation targets.**

Finally, water supply and access are becoming increasingly pressing issues for growers in other jurisdictions around the world, including prominently in the western United States, where historically low precipitation and high temperatures are threatening access to water for both urban and rural populations. While water supply has not yet become a significant challenge for Canadian agriculture, it is imperative that the Government of Canada proactively works to ensure that water management is integrated into all plans to meet Canada's sustainability targets, including in the sustainable production of food.

CPMA therefore strongly urges the Government of Canada to take a long-term view of the impacts of drought and other issues with the potential to impact Canada's water supply and to begin development

of a long-term strategy for sustainable water management for agriculture. The new Canada Water Agency can play an important role in this work and in engaging with industry stakeholders to ensure their water needs continue to be met.

Plastics

The Canadian produce industry continues to be deeply engaged across all segments of the supply chain to reduce and mitigate the use of plastics. CPMA has deliberately taken a leadership role in this space through the work of our [CPMA Plastic Packaging Working Group](#) and partnership in the [Canada Plastics Pact](#) to assist the produce industry in navigating the highly complex goal of utilizing plastic packaging in the most economically and environmentally responsible means possible while also considering the food safety and food security implications of reducing the use of an essential technology for fresh produce.

In December 2019, the CPMA Plastics Packaging Working Group released a *Technical Report and Roadmap*, detailing steps industry is taking to achieve the vision of keeping plastics in the economy and out of the environment. This means driving plastic packaging innovation while also working to increase recycling rates and explore other sustainable packaging alternatives, such as light-weighting, reducing the volume of plastic per unit sold; manufacturing packaging from polymers that are more economically viable to recycle; inclusion of post-consumer recycled (PCR) content in produce packaging; designing for recycling, such as replacing multi-resin laminates with mono-resin laminated packaging; incorporating packaging design and materials into procurement decisions; and providing customers with the opportunity to buy items loose and take them home in their own reusable containers.

In June 2020, the Plastics Packaging Working Group published the *CPMA Preferred Plastics Guide*. This guide is intended to help inform and support CPMA members in their packaging decision making processes, and will be updated as developments in packaging materials, design and recycling capabilities warrant. A more comprehensive *CPMA Material Selector Guide* was published last November, designed to help our members choose the packaging materials that can provide the food safety and shelf life benefits they need to keep fresh fruit and vegetables on Canadian tables while making the least environmental impact.

Current Working Group efforts are underway to develop a potential industry-led pilot project (Sustainable Packaging Demonstration Project) and a comprehensive resource for industry to determine which materials are able to be recycled or composted in which jurisdictions across Canada. While our work supports an environment of innovation and collaboration that the Government can harness and build upon to effectively reduce the use of unnecessary and problematic plastics, we also need to address the challenge of fragmented collection system across the country that do not effectively collect and recycle the materials currently in circulation that could be kept and utilized in the circular economy.

We encourage the Government to work closely with industry to take a systems approach to find solutions that are evidence-based, and include a combination of education, innovation, and effective recycling collection within communities across Canada. CPMA would particularly like to emphasize that the development of harmonized, efficient and cost-effective recycling collection within communities across Canada is of utmost importance in supporting a circular economy. Without this critical infrastructure in place, industry transitions to recyclable or compostable packaging materials will be rendered futile.

Strengthening Food Security and Mitigating Food Loss and Waste

CPMA urges the federal government to provide ongoing financial support to achieve the targets of the Food Policy for Canada to promote long-term social, environmental and economic sustainability of the Canadian food system and increase Canadians' consumption of safe and nutritious food. Increasing overall access to a variety of nutritious food for all Canadians, year-round, means supporting the entire agri-food value chain, including support for innovation in areas such as the storage, distribution and transportation sectors, resulting in better nutrient retention, reduction in food waste and lower prices for the consumer.

CPMA has worked with partners to develop an online Waste Efficiency Tool to address food waste and other efficiency challenges in the produce supply chain. We were also a proud partner in delivering the federal government's Surplus Food Rescue Program (SFRP). Working with Second Harvest, CPMA has purchased over 10 million dollars worth of surplus food from the produce, fish, seafood, meat and poultry sectors. This food has been distributed to food banks and communities across Canada, with 23% delivered to northern and Indigenous communities. In all, 1,121 agencies received food from our SFRP contract, contributing to a 50% reduction in food insecurity in communities compared to projected forecasts.

Moving forward, the Government of Canada should commit funds and resources to support the reduction of food loss and waste across the supply chain, including and building upon the work of the Surplus Food Rescue Program and the Food Waste Reduction Challenge.

On behalf of the fresh fruit and vegetable supply chain, I would like to offer our support to the efforts of the Committee to examine the environmental contribution of agriculture in Canada. CPMA and our members are ready and willing to be active partners in finding effective and workable solutions to Canada's environmental challenges. We would welcome the opportunity to appear before the Committee to discuss these important issues further and to answer any questions Committee members may have.

Sincerely,



Ron Lemaire
President
Canadian Produce Marketing Association

About CPMA

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 is proud to represent domestic and international members, across all segments of the fresh produce industry, who are responsible for 90% of the fresh fruit and vegetable sales in Canada.