



June 08, 2022

Submitted Via Email

To Whom It May Concern:

RE: Country Consultation - NAPPO Draft Strategic Plan and Letter Consultation period

On behalf of the Canadian Produce Marketing Association (CPMA), it is my pleasure to provide comments to inform Canada's position regarding the revision of the North American Plant Protection Organization (NAPPO) Strategic Plan for 2022-2026.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate spanning the entire produce industry. The Association's members include major growers, shippers, packers, and marketers; importers and exporters; transportation and logistics firms; brokers, distributors, and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

To begin, CPMA would like to reiterate the vital role that crop protection tools play in protecting our food and crops from threats such as invading weeds, insects, and disease, recognizing that these products should 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. As mentioned in the Draft Strategic Plan, we acknowledge that the threats outlined above will be exacerbated by climate change as it leads to "geographical expansion of pest distributions, more frequent pest introductions, the development of new or expanded endangered areas, as well as opportunities for growing new crops which may result in new pest risks". In this context, crop protection tools are essential to the fresh fruit and vegetable sector, which is one of the most global supply chains in the world.

CPMA is strongly supportive of NAPPO's commitment to facilitate safe trade based on science-based regional standards and harmonized phytosanitary measures. Phytosanitary requirements that are not science-based or essential to security act as effective non-tariff trade barriers between countries and must be eliminated. Consumer confidence in the safety of the food supply is also eroded when jurisdictions have different regulations, or if there is not sound science behind them. Consistent, evidence based Maximum Residue Limits (MRLs), and harmonized standards and phytosanitary measures will serve to boost trade for producers while also allowing a variety of healthy, safe fresh produce choices to continue to be available to consumers around the world. With this in mind, CPMA is strongly supportive of NAPPO's aim to provide a forum for the timely exchange of scientific, technical and research information that may come from NAPPO member countries and relevant organizations to promote and maintain science-based decision-making.

It is also important to note that ensuring that MRLs for crop protection tools are based on sound science and an appropriate risk-based approach around the world is also critical for the fresh produce sector. CPMA is therefore

pleased to see included in NAPPO's Draft Strategic Plan a commitment to taking a leadership role in the international phytosanitary community by promoting the use of NAPPO regional standards, including commodity standards, as models for new International Plant Protection Convention (IPPC) standards while partnering and coordinating with key international organizations as well as government bodies on various strategic issues.

As outlined in NAPPO's Draft Strategic Plan, CPMA also acknowledges the concerns regarding ever-growing pest risks due to the rise in "commodities from new sources, the expansion of e-commerce, agricultural and forestry practices that defy "one commodity-one country" models, new stakeholders, and increasing requests for import market access". The harmonization of international standards, including pesticide regulation, products, and allowable residues, as noted above, will play an important role in mitigating against these issues, while allowing for the increase of market access and ensuring the continued sustainability of the Canadian fresh fruit and vegetable industry. This will require collaboration both between key government bodies from Canada, the United States and Mexico, key industry stakeholders, as well as government bodies from around the world. NAPPO can play an important role in facilitating this collaboration.

Finally, moving forward, CPMA would like to note that NPPOs in their decisions regarding MRLs or approval/renewal of crop protection products should consider the availability, cost and safety of alternative tools to avoid unintended negative impacts to food security or trade. As we have noted in the attached Draft Strategic Plan, NAPPO is therefore encouraged to work with NPPOs to ensure that they include factors such as cost and the extent to which products are available in North America in facilitating the exchange of information about alternatives to Methyl Bromide, or in similar exchanges related to other crop protection tools.

Thank you again for the opportunity to provide comments to inform Canada's position regarding the revision of the North American Plant Protection Organization (NAPPO) Strategic Plan for 2022-2026.

We appreciate you taking the time to review our comments.

Regards,

A handwritten signature in dark ink, appearing to be 'RL' followed by a horizontal line.

Ron Lemaire
President
Canadian Produce Marketing Association