



Environment and Climate Change Canada
Submitted via email to adaptation@ec.gc.ca

July 15, 2022

RE: Consultation on *Canada's first National Adaptation Strategy*

To Whom It May Concern:

On behalf of the Canadian fresh fruit and vegetable industry, we welcome the opportunity to provide comments to the Government of Canada's consultation on a *National Adaptation Strategy*.

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 over 820 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

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. A sustainable environment is essential to the future viability and growth of our industry and Canada as a whole. The agricultural sector will also be a key partner in tackling climate change and in positioning Canada as a leader in the transition to a greener economy and more climate resilient communities.

The COVID-19 pandemic, as well as recent events such as the devastating floods in British Columbia and disruptions at ports of entry have shone a light on the serious potential impacts of such events on food availability in Canada. They have also demonstrated that effective solutions can be achieved when government departments, international partners and other stakeholders work together with urgency and dedicated focus.

It is our sincere hope that the National Adaptation Strategy will provide a path forward to finding collaborative solutions to address the climate challenges we face and foster a strong, resilient Canada, now and in the future.

Supporting a sustainable fresh produce sector

- 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 the Strategy on Zero Plastic Waste.

- Growers and others along the produce supply chain have led the way in adopting environmentally sustainable practices for many years, with benefits to carbon sequestration in Canada. CPMA recommends that the National Adaptation Strategy include measures to provide reasonable and fair recognition for past efforts to reduce greenhouse gas emissions and implement more environmentally sustainable practices.
- 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. 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 to demonstrate our country's rightful place as a leader of sustainable, safe and responsibly produced food. A private-public coalition of over 40 diverse partners, including CPMA, has released the [Business Case for Establishing the National Index on Agri-Food Performance](#), as well as indicators and sub-indicators to demonstrate Canada's agri-food leadership in a more demanding food world. The proposed [National Index on Agri-Food Performance](#) will provide an essential tool to benchmark Canada's food production against global best practices and environmental, social, and health priorities, and align with global sustainability frameworks. CPMA recommends that the federal government continue to support this important initiative and provide sufficient resourcing to ensure the National Index on Agri-Food Performance meets its strategic purposes. In addition, the National Adaptation Strategy should support such collaborative efforts between the federal government and industry to leverage the sustainable practices of Canada's agricultural sector.
- It is imperative that the National Adaptation Strategy take a holistic view of sustainable development and recognize that the priority of all governments must be food security. In the fresh produce sector, production methodologies are rapidly improving and innovating – for some, like the greenhouse sector, this includes minimal use of plant protection products (PPPs) and a reliance on Integrated Pest Management 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 have also changed the use patterns of PPPs. At the same time, the global reality is 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, which we must also recognize are not static challenges, but mutate and migrate. Without the necessary tools to ensure fresh fruit and vegetable products reach harvest, well-intentioned efforts could result in devastating impacts to both the economic viability of growers, as well as the availability of these healthy products for Canadians.
- Similarly, CPMA emphasizes that the Canadian fresh fruit and vegetable sector needs access to global advancements in agricultural biotechnology, including gene-editing systems and tools for plants, in order to stay competitive globally. The U.S. has moved to exempt agricultural innovations that are the products of plant genome editing from being regulated. The European Union has also recently demonstrated greater openness towards a risk-based approach, rather

than a precautionary one, for plants that are genetically modified. CPMA is strongly supportive of Health Canada's recently released guidance related to the regulation of novel foods in Canada, which will better enable these products to enter the Canadian market and maintain the Canadian industry's competitiveness, and which reflects the successful safety record of plant breeding in Canada and across the globe. We strongly urge the government to proactively defend its decisions based in sound science and to help educate Canadians on the safety and long-term benefits of these new technologies, which can help farmers and food processors adapt to changing climate and pest pressures while continuing to grow safe, high quality, affordable food.

- The National Adaptation Strategy must also consider that changes to current production technology and biotechnology have the potential to create unintended consequences that could lead to the increased use of land for agriculture. For example, in Canada, 50% more farmland would be needed to grow what we do today without pesticides and biotech crops. Increased land use that threatens natural habitats, wildlife and potentially biodiversity is of concern to the global community and should be a cornerstone of decision making that integrates a responsible and sustainable approach to production, particularly as Canada and other countries work to adopt the UN Sustainable Development Goals.
- 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. 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. CPMA strongly recommends that the National Adaptation Strategy should incorporate the development of a long-term strategy for sustainable water management for all Canadians, including ensuring a secure source of water for agriculture.

Mitigating problematic 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 as an implementation partner with 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 plastics for fresh produce.
- The CPMA Plastics Packaging Working Group was established in May 2019 to begin the process of identifying a path forward to address the use of plastics within the produce sector, including identifying efforts already undertaken by industry, determining best practices, and developing an industry-supported roadmap to maintaining food quality and safety while reducing the environmental impact of plastics.

- In December 2019, the CPMA Plastics Packaging Working Group released a *Technical Report and Roadmap*, detailing steps we are taking to achieve our 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, like composting and packaging reuse. 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 in November 2020, 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 focused on the creation of additional resources to inform industry decision-making and to address sustainability concerns with PLU stickers used on bulk produce through supporting a transition to the use of industrially compostable stickers. In addition, a national pilot project is underway to develop a strategy that will encourage effective pathways to migrate from current packaging with limited recyclability to an array of sustainable packaging form factors and related materials. The work done on this project will also include the consideration of barriers to desired food and produce packaging in particular circumstances or conditions. This pilot, undertaken in partnership with Food and Beverage Canada, will help to advance the collective efforts of Canada's produce and food sector in reducing the environmental impacts of food and produce packaging.
- As noted, the fresh produce industry has been deeply engaged and invested in reducing the use of problematic plastic packaging. However, one consistent, significant challenge we face is the lack of harmonization in collection and recycling capacity/practices across the provinces. For businesses selling packaged products across Canada, identifying a packaging solution that is consistently recyclable across jurisdictions while also meeting shelf-life and food safety needs can be exceedingly difficult, if not impossible.
- CPMA emphasizes that federal and provincial alignment and cooperation is necessary to enable the necessary recycling systems to mitigate and reduce the use of problematic plastics across Canada. The federal government's efforts relative to single-use plastics prohibitions and increasing post-consumer recycled (PCR) content in certain plastic manufactured items must therefore be complemented by efforts to dramatically improve both the infrastructure to support PCR availability (i.e. recycling), as well as consumer education. Without a concerted effort in both areas, efforts to ban certain packaging forms, and to improve the PCR content of others, will never achieve the targets set.
- CPMA strongly encourages the Government of Canada to promote the use of common standards, best practices, and consumer and industry education at a national level to create a harmonized approach to increasing recycled-content and reduce the impact on the environment. Product performance standards for plastic products and packaging can contribute significant value to generating a sufficient, stable and predictable supply of materials to support a viable secondary plastics markets and investments in recovery infrastructure in Canada.

- It is also imperative that the Government of Canada take both a leadership role, as well as a coordinating role, in providing mechanisms to incentivise and support collection and recycling consistency across the country. Without formalized national coordination to support provincial and territorial implementation, Canada's success in these efforts may be hindered. The National Adaptation Strategy offers one avenue for this important work to occur.
- CPMA strongly emphasizes the importance of recognizing that regulation alone will not be effective in shifting the plastics system, either within Canada or globally. Instead, for impactful change to occur, Canada must also address the challenge of fragmented collection systems 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. The National Adaptation Strategy should include support for this critical infrastructure, without which industry transitions to recyclable or compostable packaging materials will be rendered futile.

Prioritizing access to food and strengthening Canada's food system

- The fresh produce sector is a major contributor to Canada's GDP, and to job creation from coast to coast. Creating the conditions for the fresh fruit and vegetable supply chain to innovate and operate competitively in our global marketplace is critical to securing our place as a key driver in Canada's economic recovery. In addition to our sector's economic contributions, we also provide Canadian families with safe and nutritious food that is crucial to supporting their health and well-being.
- CPMA supports 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. The Food Policy Advisory Council has an important role to play in bringing stakeholders together from across the food system to ensure that the needs and priorities of all sectors are represented and to find workable solutions in a whole-of-government approach to strengthening Canada's food security.
- The COVID-19 pandemic has highlighted the importance of healthy living, but close to 80% of Canadians are still not eating enough fruits and vegetables, resulting in an economic burden calculated at almost \$4.4 billion annually¹. CPMA's [Half Your Plate](#) campaign is working to increase fresh produce consumption in Canada, but more support is needed.
- To ensure uninterrupted access to food and essential goods for all Canadians, the Government of Canada should make food production and access to food and essential goods a priority in legislation, policy, and crisis management, including in the National Adaptation Strategy.
- To support and improve the health and wellbeing of Canadians and our communities, the National Adaptation Strategy should also support measures promoting the *Canada Food Guide* recommendation to fill *Half Your Plate* with fruits and vegetables. The development of a National School Food Policy and a national school nutritious meal program are two ways the government can and should prioritize the health of future generations.

¹ Source: *Krueger Report*, 2016

- It is also important to note that increasing overall access to a variety of nutritious food for all Canadians, year-round, means supporting the entire agri-food value chain. 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. Moving forward, the Government of Canada should continue to build upon the work of the Surplus Food Rescue Program and the Food Waste Reduction Challenge. CPMA recommends that the National Adaptation Strategy should support expanded efforts to reduce food loss and waste across the supply chain.
- Finally, as noted above, the recent flooding in British Columbia offers an example of what can be accomplished swiftly and effectively when governments and industry work together to achieve a common purpose. Learning from this experience, the National Adaptation Strategy should provide a forum to work proactively across government departments, and with port authorities and other stakeholders, to put in place a formalized process to allow for the unimpeded movement of food as an essential good in the event of future emergency events or disruptions.

Promoting supply chain resiliency and economic competitiveness

- Substantial increases in costs and delays along the supply chain continue to threaten Canada's food security and long-term economic viability. The high perishability of fresh fruits and vegetables further complicates supply chain challenges for our sector.
- CPMA emphasizes that compounding supply chain disruptions will impact the price of fresh produce. These costs cannot be fully borne by the industry and will ultimately be passed to consumers, affecting most those who can least afford it.
- Last fall, 21 organizations from across the North American produce industry released a [joint statement detailing ongoing supply chain disruptions](#) facing the sector, including: crippling port congestion, delays and exploding costs in container shipping, cascading effects of inconsistent product delivery, continuing labour shortages from farm to retail, growing input shortages and stockpiling of consumer products. This statement was followed in January by a [Supply Chain Solutions proposal](#), outlining several potential areas of government action.
- There is a critical need for the government to support programs and policies that address the significant issues impacting the ability to produce fresh fruits and vegetables, such as the availability and costs of labour, inputs for production and transportation.
- The supply chain linkages of transportation, border access and ports of entry and exit are key to ensuring the smooth flow of essential goods across our border. The high volume and perishability of fruits and vegetables means that longer dwell times at ports can not only delay delivery and increase costs for industry, but can also result in lost sales, product spoilage, and ultimately food waste. As a cold climate country that will continue to rely on imports to feed our population year-round, the smooth flow of essential products through Canada's ports is critical, not only to supporting our economic competitiveness, but also food security across the country.

- CPMA recommends that the National Adaptation Strategy should support sufficient, ongoing capital investment to enable infrastructure improvements, including at Canadian ports, and provide dedicated focus to projects supporting agri-food supply chains, including the enhancement of cold chain infrastructure. In addition, greater investments are needed in critical infrastructure – including roads, energy, and service infrastructure, such as waste management – to support thriving, resilient rural communities across Canada.
- Recognizing that these issues do not fall within the mandate of any individual Minister or department, a whole-of-government approach is critical to be able to recognize, understand and address the multi-faceted challenges at hand. CPMA has been pleased to participate in the work of Transport Canada’s Supply Chain Task Force, as well as related efforts at Agriculture and Agri-food Canada and other departments. However, we strongly recommend that these efforts should provide the starting place for longer-term, ongoing collaboration between government departments and stakeholders to identify, assess and respond to challenges in the future.

We thank you for taking the time to review our comments. Where possible, the Government of Canada should engage with the fresh produce industry as it determines proposed models and implementation plans for the key areas noted in this submission. CPMA and Canada’s fresh produce industry are keen to partner with government to ensure the success of its climate preparedness agenda and would be pleased to answer any questions you may have.

Regards,

A handwritten signature in black ink, appearing to be 'R. Lemaire', followed by a horizontal line.

Ron Lemaire
President
Canadian Produce Marketing Association