



Public Safety Canada - Critical Infrastructure Directorate
Submitted via email to: ps.cci-cie.sp@ps-sp.gc.ca

June 2022

RE: National Strategy for Critical Infrastructure Renewal

To Whom It May Concern:

On behalf of the Canadian fresh fruit and vegetable industry, we welcome the opportunity to provide comments to Public Safety Canada regarding the National Strategy for Critical Infrastructure Renewal.

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

Comments

CPMA supports the Government of Canada's ongoing efforts towards the National Strategy for Critical Infrastructure Renewal. This initiative supports the health of Canadians and fresh produce, both domestically and internationally produced, is an important piece of this strategy. Canadians have become accustomed to consuming a wide variety of fruits and vegetables throughout the year which contributes to the overall health of the Canadian population.

CPMA's Responses to the Discussion Paper Questions

1. CI Definition and Sectors

1. a), b) & c)

CPMA has no objection to the current CI definition including the 10 categories identified as essential.

1. d) & e)

CPMA would like to see Space added as the 11th CI category. The fresh produce industry generates large amounts of data as part of the daily transactions occurring along the supply chain. Globally, governments and industry are moving towards data-heavy food safety and compliance systems requiring efficient and reliable data transmission, all of which are increasingly reliant upon satellite uplink and downlink infrastructure.

2. Interdependencies

2. a) CPMA believes the following are the key areas where government should be supporting industry:

- Education and training
- Modelling tools
- Impact assessments

2. b)

Two recent events highlighted some of the any the interdependencies affecting the fresh produce industry. The recent washouts of bridges and rail lines in the region surrounding Vancouver, BC highlighted the need for increased integration between CI sectors. When the primary transportation routes became impassable, food and other essential resources quickly became very difficult to procure by the Canadians living in the impacted areas. The second major example was the COVID-19 pandemic and how quickly international trade routes were paralyzed. Canada imports approximately 70% of it's fresh fruits and vegetables, so there were short to medium term scarcities of some commodities. Given the perishable nature of fresh produce, industry is accustomed to dealing with shortages of product and other sources where accessed where possible. This flexibility needs to be built into the entire CI matrix as we will experience similar short- and long-term impacts in the future.

3. Designating Vital Critical Infrastructure

3. a) & b)

Yes, criteria should be developed to identify and prioritize the most vital CI sectors, organizations, and/or assets? Food, including its production, transportation, storage, distribution, and safety must be one of the top sectors when this ranking is developed. In order for food to remain safe and nutritious, industry must have access to reliable infrastructure including roads, rail, energy, and labour. As noted in the current pandemic, access to labour has impacted all sectors of the economy and continues to be one of the limiting factors of a stronger economic recovery.

3. c)

Government should not “designate” the CI sectors, organizations, and/or assets. Designation would lead to legislative / regulatory constructs thus increasing the regulatory burden on organizations. Increased legislation would create a non-competitive environment where Canadian organizations would be at a disadvantage compared to the global industry. This would

run counterproductive to the flexibility required when critical infrastructure is called upon to keep Canadians safe and healthy.

Government should, however, take the lead in bringing the CI sectors together to create partnerships / system solutions which capitalizes on the expertise found within each. The federal government's role should be to facilitate the knitting together of the individual sector plans into a set of national CI strategies. Additionally, the federal government should take the lead in ensuring any F/T/P and international barriers hindering the CI systems are suspended or work arounds created until the return to a normal state of vigilance.

4. Incentives and Obligations to Ensure Resilience

4. a) & b)

A vital designation should be applied to those sectors where a catastrophic loss of the commodities / services would have a significant acute or long-term affect on Canada's population. Food systems should be designated as vital as should the sectors (i.e., energy, transportation, water & food manufacturing) required to allow the food system to operate. Incentives should be provided to these sectors where it can help these sectors develop their strategies. The specific incentives required will vary depending on the industry, but all would benefit from the inclusion of government expertise in the areas of justice, foreign affairs, international trade, national security, and others as requested by the sectors.

Government should not impose additional obligations on those responsible for the vital sectors, but instead, should act as the catalyst allowing the individual and combined sectors to create the strategic and tactical plans necessary. It is important that government develops open lines of communication with senior management of industry associations, critical individual organizations, provincial / territorial governments, and key trading partners ensuring both the scope and specifics of a plan are understood.

Similar to 3. c), government should not use a regulatory mechanism for either specific industries or senior management of these industries. Additional regulations rarely streamline or improve the efficiency of a system, and this is particularly true when a CI strategy needs to be activated. Government and industry must come to a consensus on the necessity, components, and triggers of CI plans.

4. c)

As noted above, owners and operators of CI organizations should not be "obligated", but CPMA has no objection to the list of informational needs as presented.

5. Support to the CI Community

5. a) & b)

As a national organization, CPMA's primary source of support are the federal agencies, but we occasionally request information from individual provinces, if required. Currently, there are no

specific areas where help is lacking, but there are occasional lapses in government support / responsiveness. CPMA and government are addressing these concerns and this CI discussion is not the correct forum to bring this forward.

Individual CPMA members will use CPMA to assist them when dealing with a variety of issues. If a particular issue is identified as having a larger impact on a significant segment of our membership, CPMA will initiate a project to understand and develop solutions for the industry at large.

6. CI Community Collaboration

6. a)

CPMA supports all of the suggestions listed to help increase CI collaboration. As implied above, communication and a need for mutual agreement between government and industry is key to creating successful CI strategies.

7. Objectives for a Renewed Approach to CI

7. a)

Rank of the three existing objectives:

1. Building partnerships
2. Advancing the timely sharing and protection of information among partners
3. Implementing an all-hazards risk management approach

7. b) & c)

Currently, the 3 objectives are acceptable, but changes should be made, as required, as the process progresses. CI must be adaptable as the threats to Canada, our trading partners and global security continue to evolve. CI must be based on a solid understanding of the potential issues facing the nation, but it must not be so rigid that it is unable to adapt if an unexpected threat was to arise.

8. Broad Remarks

CPMA has no other remarks at this time.

CPMA's Responses to the Ideas Board Questions

1. Governance

It is critical that the federal government act as the coordinating body to ensure CI strategies are appropriate for the threat being faced and the areas of the country being affected. Strategies must be based on input from the sectors, the provinces & territories and, where applicable, our primary trading partners. Government must be open to allowing "work-arounds" when specific regulatory tools impede the "greater good" in a particular situation.

2. Evaluating the National Strategy

How to measure the resilience of critical infrastructure should be developed jointly between government of the individual sectors. The sectors understand the dynamics involved in running a business and service and are in the best position to identify the pain points. Government must lead on the regulatory and global implications of a national strategy. This can include assessing the plans developed by other countries and our key trading partners.

3. Academic Research and Expertise

Academia, and subject matter experts, have a role to play under a National Strategy and in particular the design of “stress tests” needed to evaluate the resiliency of the systems. It is important, however, that the CI strategy does not become an academic / theoretical exercise. CI must address the “real world” challenges faced by Canadian families, businesses, and government.

4. Open Question

CPMA has no other comments at this time.

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 Critical Infrastructure agenda and would be pleased to answer any questions you may have.

Regards,



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President
Canadian Produce Marketing Association