



Canadian Food Inspection Agency
International Phytosanitary Standards, International Affairs Branch

Submitted Via Email to: cfia.ippc.acia@inspection.gc.ca

December 15, 2023

RE: D-99-06: Policy on the Issuance of Phytosanitary Certificates for Export and for Re-export.

To whom it may concern,

The Canadian Produce Marketing Association (CPMA) welcomes the opportunity to provide feedback to the Canadian Food Inspection Agency (CFIA) regarding the ongoing consultation on the proposed revisions of the *D-99-06: Policy on the Issuance of Phytosanitary Certificates for Export and for Re-export*.

About CPMA

Based in Ottawa, 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 830 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

CPMA is appreciative of CFIA's initiative to revise procedures for the application and issuance of electronic phytosanitary (ePhyto) certificates through the MyCFIA online service portal. This is a welcome initiative with potential to have significant benefit to the fresh produce sector, including many small and medium-sized enterprises, particularly given the time-sensitive realities of our supply chain. CPMA emphasizes that the Government's digitalization efforts should use a cross-government lens and take a whole-of-government approach to reduce burden for industry. Furthermore, these proposed changes align with the evolving landscape of digital services and hold the potential to enhance efficiency in the certification process by reducing administrative burden and expediting the overall certification timeline. This transition to digital platforms is not only in line with modern technological trends but also promotes environmental sustainability by minimizing paper usage. Additionally, electronic issuance facilitates transparency and traceability of the certification process. CPMA strongly believes that wherever possible, efforts to promote the harmonization of standards and the mutual recognition of plant protection and food safety systems with our trading partners can help remove unnecessary and costly duplication within both the international supply chain and government systems. Moreover, the

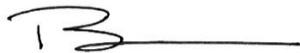
use of ePhytos facilitates electronic exchange between countries, making trade safer, easier, faster, cheaper, and more environmentally friendly with over 116 countries using ePhytos.^{1 2}.

While we recognize that it is outside of the scope of the CFIA's mandate, we must note that a lack of digital infrastructure remains a major roadblock to innovation for many growers and other businesses in the fresh produce industry, and renders many businesses in rural, remote and Indigenous communities unable to reap the full benefits of digitalization. Over 90 percent of Canada's farmers are dependent on exports³, yet majority of Canadian farmers live in rural areas.⁴ The CFIA must remain aware of these challenges and ensure that those without the digital infrastructure they need are still able to access services.

In conclusion, CPMA supports the proposed procedural changes for phytosanitary certificate application and issuance via the MyCFIA online service portal. As noted above, ensuring interoperability and cross-government integration, and avoiding duplication in requirements for information submission, are essential to realizing the benefits of digitalization and reducing administrative burden for industry.

We thank you for taking the time to review our comments and would be pleased to answer any questions you may have.

Regards,



Ron Lemaire
President
Canadian Produce Marketing Association

¹ [International Plant Protection Convention \(2022\)](#)

² [International Plant Protection Convention \(2023\)](#)

³ [Canadian Agri-Food Trade Alliance, 2021](#)

⁴ [The socioeconomic snapshot of Canada's evolving farm population, 2023](#)