



Treasury Board of Canada

Submitted Via Online Portal and Via Email to : regulation-reglementation@tbs-sct.gc.ca

February 5, 2024

RE: *Consultation on the Supply Chain Regulatory Review*

To Whom it May Concern,

On behalf of the Canadian Produce Marketing Association (CPMA), we welcome the opportunity to provide comments to the Treasury Board of Canada consultation on the Supply Chain Regulatory Review. CPMA supports the Government of Canada's ongoing efforts towards regulatory modernization, which is necessary to maintain and strengthen the fresh produce industry's global competitiveness.

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

As background, CPMA was the industry co-lead on the Journey Mapping Working Group under the Agriculture and Agri-food Canada Agile Regulations Table and supported the recommendation to develop a toolkit to be integrated into the suite of Government of Canada regulatory policy tools to support:

- Understanding of the impact regulations have on business operations,
- Sharing of government objectives imbedded in regulatory requirement setting,
- Enhancing engagement and consultation throughout the regulatory process (i.e. improving the capacity to both provide and consider input after *Canada Gazette I*), and
- Providing a standardized means of consultation to ensure the regulatory process has clear objectives and information data points, thus supporting "whole of government" visibility.

CPMA is also a standing member of the Canada Border Services Agency Border Commercial Consultative Committees (BCCC) and was pleased to contribute to both the National Supply Chain Summit held in January 2022, as well as to the consultations undertaken by the National Supply Chain Task Force later that year. This strong engagement in the supply chain regulatory space is a reflection of the importance of these issues to our diverse membership.

The many supply chain challenges and disruptions of the past few years have shone a light on the serious potential impacts of such events on food availability in Canada. It is estimated that \$4 out of every \$5 dollars spent on fresh produce in Canada is spent on imported produce, making the efficient and timely movement of product across the border a key contributor to the security of Canada's food supply. In addition, the fresh produce sector relies heavily on export markets to ensure the long-term sustainability

of Canadian food production. CPMA has been pleased to see the federal government's continued commitment to developing a National Supply Chain Strategy, and strongly urge the government to use the initial efforts of the new Supply Chain Office to prioritize this work and the implementation of the [National Supply Chain Task Force report](#) as the starting point for more effective cross-governmental collaboration to address supply chain disruptions in the short-term, foster resiliency in the longer-term, and help ensure Canadians can continue to put our essential products on their tables.

CPMA applauds efforts to assist federal regulators in assessing the impacts of their regulations on the competitiveness of Canadian businesses. This is a foundational element of our work with the government and can best be summarized as ensuring that government recognizes food production and access to food as a priority in all legislative, regulatory, policy and crisis management efforts.

General Comments

The Government of Canada has previously recognized agriculture as a strategic sector for Canada. That recognition must include acknowledgement of the logistical realities of highly perishable fruit and vegetables, which mean that priority must be given across regulations to areas that ensure the smooth production and flow of these commodities, both domestically and across international borders. Increased data gathering and transparency across the supply chain is essential to enabling the prioritized movement of our essential products.

Prioritizing effective stakeholder engagement and consultation

Industry-specific consideration must be a foundational element of regulation setting. The complexities and unique considerations of the fresh produce sector, related to the nature and perishability of our product as well as time-sensitivity across the supply chain, can often mean that a one-size-fits-all regulatory approach will be ineffective, inefficient and impose undue burden on industry, with little benefit to the Canadian Government or indeed the Canadian public. Early engagement with stakeholders across the agri-food value chain can allow the government to leverage industry expertise and ensure the development of practical policies and regulations that fuel the sector to become an even more powerful economic engine for Canada, while also meeting the needs of the sector, the government and the Canadian public.

In addition, industry stakeholders are often engaged in, and have visibility to, regulatory initiatives on the horizon across government departments and/or jurisdictions, which may be siloed from each other. For example, CPMA members must monitor and comply with regulatory and policy requirements from the Canadian Food Inspection Agency, Health Canada, the Canada Border Services Agency (CBSA), Agriculture and Agri-food Canada, Environment and Climate Change Canada, among others. Leveraging this industry knowledge base can help government to take a more holistic, cross-government approach to planning implementation, reducing duplication and mitigating unnecessary regulatory burden. Therefore, CPMA strongly urges the Government of Canada to prioritize thorough consultation with industry prior to making regulatory changes and to move away from a perfunctory approach to stakeholder consultation, to better understand the proposed changes.

Promoting Canadian competitiveness

CPMA also emphasizes that the Government of Canada should consistently apply a competitiveness lens to regulation-making and review, and commit to the cross-department deployment of resources, such as the Treasury Board's Competitiveness Assessment Tool and AAFC's Journey Mapping toolkit, to foster better government understanding of the impacts of proposed policy and regulations, consider cumulative

regulatory burden, and ensure that one department's regulations do not hinder industry's ability to be compliant with another department's regulations or meet government targets.

As noted in previous submissions, CPMA applauds the intent of the Treasury Board's proposed Competitiveness Assessment Tool (CAT) to help consider and limit unintended impacts on the competitiveness of Canadian businesses. CPMA urges Treasury Board to ensure that the CAT is mandatory for all government departments – the true value of a tool such as this one is in a harmonized, whole-of-government implementation that provides the assurance to industry that the rigor and value of the tool is ubiquitous. We also strongly encourage Treasury Board to implement the Journey Mapping Tool noted above across government departments to further foster understanding of the impact of new or changing regulations.

Facilitating trade

International trade is critical to the success of the Canadian economy and the fresh produce industry, one of the most highly globalized supply chains in the world. CPMA strongly recommends that similar regulations in the countries that are our major trading partners are reviewed and considered in the development of Canadian regulations. Furthermore, Canadian regulations, while recognizing any uniqueness within Canada, should not impose measures exceeding those of our trading partners, which can work to render Canada an undesirable export market. In the case of fresh produce, these considerations have a tangible impact on food security for Canadians.

Finally, the COVID-19 pandemic, as well as events like the catastrophic flooding in British Columbia, have demonstrated the benefits for government, industry and the public alike when dedicated and collaborative effort is put into finding flexible solutions to address urgent challenges. CPMA strongly encourages all government departments to take stock of the lessons learned over the past few years to proactively plan for future events and support long-term supply chain resiliency. As part of this effort, we recommend that Treasury Board consider developing guidance on flexibility of regulations as a standardized component/mechanism in regulation to enable quick responses to catastrophic events and disruptions.

Border operations

As noted above, the fresh produce supply chain is one of the most highly globally integrated supply chains in the world, and international trade is critical to the success of the Canadian fresh produce industry. 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.

It is also important to recognize that 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. Therefore, the smooth flow of essential products through Canada's marine ports and other ports of entry is critical to supporting both our economic competitiveness and food security across the country.

Q1: Are changes needed to modernize the regulatory frameworks pertaining to customs warehouse regime(s) (Customs Sufferance Warehouses Regulations and/or Customs Bonded Warehouses Regulations) and the secure movement and storage of goods that are entering Canada, to improve capacity and support supply chain fluidity? If so, please describe them.

Cold chain infrastructure is critical to supporting a smooth and fluid fresh produce supply chain. CPMA members have expressed that increased climate/temperature-controlled, secure warehousing solutions are needed to support Canada's current and growing infrastructure needs.

Due to time constraints, Canada's needs and challenges related to cold chain infrastructure were not considered in the scope of the National Supply Chain Task Force report. CPMA urges the Government of Canada and the National Supply Chain Office to engage with industry to explore opportunities to incentivize and facilitate the growth and development of this critical component of our national supply chain infrastructure.

Q2: Are changes needed to modernize the regulatory frameworks pertaining to the customs warehouse regime(s) (Customs Sufferance Warehouses Regulations and/or Customs Bonded Warehouses Regulations) to further improve Canada's economic competitiveness? If so, please describe them.

As noted above, increased climate/temperature-controlled warehousing solutions are essential to the smooth movement of highly perishable fruits and vegetables, and therefore to the economic competitiveness of Canada's fresh produce industry. The National Supply Chain Office should undertake a review of the regulatory frameworks pertaining to the customs warehouse regimes to ensure that they effectively enable the growth and development of cold chain warehousing infrastructure, align with international agreements, and avoid creating barriers to trade or imposing undue administrative burden on industry stakeholders.

CPMA reiterates that early and ongoing engagement with stakeholders across the supply chain and coordination across relevant government departments are critical to understanding the potential impacts of regulatory changes, avoiding unintended barriers to supply chain fluidity, and promoting Canadian competitiveness.

Q3: Are changes needed to modernize the regulatory frameworks pertaining to special services that are offered in relation to the cross-border movement of goods? Note: Special services are generally performed by the government at the request of a person in charge of imported goods or goods destined for export that may be considered extraordinary (for example, services provided outside posted hours of operation, course of duties or geographic areas serviced).

CPMA recommends that, in Federal Budget 2024 and beyond, the Government of Canada should commit sufficient, ongoing capital investment to enable infrastructure improvements, including at Canadian ports, and allocate dedicated funding to projects supporting agri-food supply chains, including the enhancement of cold chain infrastructure.

One key aspect of this government effort should be to support the critical role of agriculture inspections in port operations. Whether inspections occur at or near a port of entry, agency resources have been stretched over the past few years. Government food and agriculture inspection agencies should have a "plan B" in place to address situations such as staffing shortfalls or other resource or logistical constraints. Where possible, the agencies should coordinate on a state/province or local level to ensure that sector-specific nuances are taken into consideration. In addition, recognizing the volatility of the fresh produce sector due to factors such as weather and plant health issues, the Government should ensure that programs have built-in mechanisms to enable a nimble response when such abrupt impacts occur.

At the same time, even prior to the pandemic, CPMA members have consistently expressed frustration with the lack of inspection service availability on weekends or after hours, which can often mean a reduction in shelf life for products awaiting inspection. The highly perishable nature of fresh produce, as well as the high volume of shipments and the “on-time” delivery model of the produce supply chain require inspection capacity that can support the timely movement of products across the border and throughout the country. The Government of Canada should explore opportunities for regulatory modernization to enable this capacity.

Finally, extreme weather events, border blockades and labour disruptions over the past few years have demonstrated the significant impact such events can have on the movement of goods. The Government of Canada should provide resources for government departments to work proactively with port authorities and other stakeholders to implement a formalized process to allow the movement of food and essential goods through ports of entry in the event of emergency events or disruptions - including implementing a provision to allow the movement of fresh produce similar to that in place for grains under the Canada Labour Code.

Transportation

Transportation is a key component of the fresh produce supply chain, made even more important due to the perishable nature of fruits and vegetables. The ongoing shortage of commercial truck drivers is made worse in the produce industry, as available drivers often choose to take less urgent, non-refrigerated loads. It is critical to recognize that when fresh produce is not moved in a timely manner, significant food waste and lost revenue can result throughout the supply chain.

Q1: What regulations currently pose a limit on the efficient movement of goods across Canada due to a lack of harmonization between federal and provincial requirements?

Many Canadian businesses across the fresh produce supply chain operate across multiple provinces or indeed across the country. The removal of inter-provincial regulatory barriers is critical to supporting not only our sector’s economic growth and competitiveness, but also Canada’s food security.

Harmonizing spring weight restrictions on highways

The produce industry transports goods from coast to coast to coast to provide Canadians with healthy, quality products. However, substantial and compounding increases in costs and delays along the supply chain threaten Canada’s domestic food security and the long-term economic viability of the fresh produce sector.

The lack of alignment of spring weight restrictions on highways during the thaw (February to May annually) further increases the costs of moving product interprovincially. As a result of differing spring weight restrictions across the country, additional trucks must be sent out to make up for the lost weight when shipping interprovincially. The cumulative cost of this lack of alignment across the entire fresh produce industry is another in a series of incremental costs that threaten the domestic food supply.

This issue had previously been included in the work plan for the Regulatory Reconciliation and Cooperation Table under the *Canadian Free Trade Agreement*. Federal leadership on this file can help reduce regulatory barriers and costs faced by grower/packer/shippers in the fresh produce industry. Particularly given the massive increase in shipping and other costs over the past two years and the

resulting rise in food prices, as well as an ongoing shortage of truck drivers, all efforts should be made to remove barriers to the movement of food across provincial borders.

Proposed regulatory framework for recyclability labelling on packaging

In April 2023, Environment and Climate Change Canada published for comment a Regulatory Framework Paper for the proposed *Recycled Content and Labelling for Plastic Products Regulations*, which raised several areas of concern for the fresh fruit and vegetable sector, including proposed labelling requirements for the recyclability of packaging.

CPMA has significant concerns with the proposed recyclability labelling rules, and their feasibility of implementation for the fresh produce industry at large. The proposed requirement for fresh produce packaging labelling to accurately reflect regional/provincial plastics systems will introduce significant cost and risk to the fresh produce industry.

At present, there is a wide range of barriers to the implementation of clear and consistent collection, sorting and re-processing criterion at the provincial level, let alone at a national level. As such, the variance in collection, sorting and re-processing by region differs to the extent that packaging labelling will very likely need to vary by province in order to be compliant with the proposed regulations.

As noted above, many Canadian businesses across the fresh produce supply chain operate across provincial borders, with product regularly redistributed to meet consumer demand in different regions. The proposed regional packaging labelling requirement is therefore not compatible with the realities of fresh produce supply chains, which are optimized to deliver fresh produce to their destinations in a timely manner, minimizing fresh produce waste, and keeping the cost of produce down. Under the proposed approach, there is also increased risk for consumer confusion in what constitutes a recyclable package, with potential adverse impacts on consumers' purchasing of fresh produce as well as on the effectiveness of recycling programs.

Furthermore, CPMA has significant concerns with the lack of clarity on how labelling requirements will be updated as waste collection systems evolve regionally, and the effect such changes could adversely have on the effectiveness and efficiency of the fresh produce supply chains. This concern is compounded by the proposed requirement for each individual company to house recyclability information on their websites and the associated burden to ensure consistency and clarity in the information provided, including ensuring timely and accurate updates. As such, CPMA strongly urges the Government to give serious consideration to the development of national labelling requirement for select applications, such as produce packaging, as the only feasible solution which would permit compliance across all provinces and territories.

Q2: How can regulatory frameworks better enable Canadian ports and their adjacent warehouses to handle increased traffic?

In November 2021, CPMA and other organizations from across the North American produce industry released a [joint statement detailing ongoing supply chain disruptions](#) facing the sector at the time, including: crippling port congestion, delays and exploding costs in container shipping, cascading effects of inconsistent product delivery, continuing labour shortages, growing input shortages and stockpiling of consumer products. In January 2022, CPMA's North American Trade Working Group released a [Supply Chain Solutions proposal](#), which outlined several potential areas of government action.

While most of these disruptions have eased from their peak, many of the recommendations in that proposal are still relevant to Treasury Board's efforts here, including:

- **Establish protocols to prioritize the movement of perishable and essential goods to mitigate port congestion, avoid food waste and food insecurity, and support the return of refrigerated containers into the system.** Wherever possible, port authorities and government bodies should expedite the inspection and clearance of perishable commodities. CPMA strongly recommends the establishment of priority lanes at ports of entry and the expansion of Trusted Trader programs to further streamline the movement of essential and perishable products across the Canadian border.
- **Identify and facilitate mechanisms to move containers inland to aid in the clearing of ports and the triaging of container movements,** such as through the temporary use of unused lots in the vicinity of marine terminals and the building of inland container storage yards.
- **Recognize the interconnected nature of the supply chain in planning initiatives intended to ease port congestion.** For example, expansion of port operation hours is only effective to the degree to which the rest of the supply chain, such as warehouse operations, carriers and customer receivers, can follow suit.
- **Long-term, revitalize port infrastructure and strengthen government oversight** into the maintenance of port service standards to streamline operations for the future.
- **Increase data gathering and transparency of information related to cargo movement** through port terminals to support business operations and logistics planning, as well as improvements to port infrastructure and operations.
- **Identify measures to smooth the flow of truck shipments,** including addressing jurisdictional disharmony between truck weight limits (as noted above) and temporarily extending the Hours of Service for carriers hauling agricultural goods and/or packaging supplies or other agricultural inputs in the event of an emergency event or disruption.
- **Provide incentives to support the domestic fulfillment of positions in areas critical to keeping the supply chain moving,** such as in warehouses and transportation. Seek opportunities to simplify and streamline the process for companies to hire international workers where the demand exceeds domestic capacity, and implement government training programs, promotion and incentives for people to learn skills that can help bridge the labour gaps across the supply chain.

Q3: How can regulatory frameworks help support testing new environmentally-friendly freight shipping options (e.g., approaches in shared jurisdictional waters; adoption of electric vehicles (EVs) for on-road transportation of goods; improving use of alternative fuels for vehicles)?

CPMA generally supports the implementation of regulatory sandboxes and has suggested previously that technological innovation in the agriculture and agri-food sector could be a valuable space to consider for this work. The testing of more sustainable freight shipping options could pose another area of opportunity.

At the same time, it is important to note that cross-department and agency consideration and collaboration is also necessary to ensure that Canadian supply chains can realize the benefits of the many technological innovations becoming available to enable more sustainable practices. Regulators must therefore consider the resource implications of the new regulations for the government department(s) responsible for enforcement and to the industry/businesses impacted.

CPMA emphasizes that effective government support for the long-term sustainability of Canadian supply chains – including social, economic and environmental considerations – requires an enabling regulatory environment for the testing and scaling up of new products and technologies, and the de-risking of the adoption of more sustainable practices.

Q4: What changes could be implemented to Canada’s competition rules and regulations in the transportation sector to better optimize the overall transportation and logistics supply chain?

As noted above, transportation is a critical component in the movement of fresh fruits and vegetables from the farm to Canadian tables. Over the course of the pandemic, weeks-long shipping delays resulted in major losses of product and sales for the North American industry. Coupled with exponentially growing container costs and a limited number of refrigerated containers, this situation created serious challenges for the fresh produce industry. At the same time, major international shipping companies were regularly sending empty containers back to Asia and posted record profits, with little recourse available to those shipping products. While shipping costs have abated since their peak, they remain elevated compared to pre-pandemic levels.

The Government of Canada should continue to leverage all available tools under the *Competition Act* and *Canada Transportation Act* to ensure shipping lines and the broader transportation system are performing at a level that supports supply chain resiliency. In addition, in the January 2022 [Supply Chain Solutions proposal](#) mentioned above, CPMA’s North American Trade Working Group outlined several recommendations for government action of relevance here, including:

- **Strengthen government oversight into the maintenance of port service standards** to streamline operations for the future.
- **Increase data gathering and transparency of information related to cargo movement** through port terminals to support business operations and logistics planning, as well as improvements to port infrastructure and operations.
- **Lead multilateral investigation and enforcement efforts to ensure fair and ethical business practices by international shipping companies** to support the continued flow of goods; it is critical that these efforts do not create an economic incentive for companies to redirect their business to other countries.
- **Support the implementation of industry best practices for shippers, carriers and receivers**, such as those developed by the North American Produce Transportation Working Group, and ensure a strong dispute resolution mechanism is in place to resolve complaints.
- **Conduct a review of all fees charged for events out of the control of importers or exporters**, including but not limited to delays, holdovers, overnight holds, unloading time and changes to the Earliest Return Date, to ensure reasonable and fair business practices and avoid the accrual of costs that will be passed on to the consumer. The imposition of unreasonable charges should be prohibited.
- **Ensure that government fees do not impose unintended costs and challenges in the supply chain.** For example, CPMA members have significant concerns related to the offload inspection fees charged by CBSA’s designated service provider for highway offload examinations, which more than doubled from their previous rate in February 2023. While CBSA itself does not charge these fees, they are nonetheless costs that industry members are incurring to be compliant with CBSA’s offload policy – and are incurred by industry regardless of whether non-compliance is found. It is therefore critical that, in the tendering of government contracts, departments must also ensure that any fees charged by contracted service providers do not impose undue costs or create

unintended supply chain challenges. In addition, in advance of the addition of any “emergency” fees, consultation with industry should occur to ensure that well-intentioned efforts are not detrimental to business overall.

- **Ensure that government efforts related to international container shipping account for the need for access to refrigerated containers** to transport essential goods such as fresh produce.

CPMA is strongly supportive of the Canadian involvement in multilateral investigation and enforcement efforts to ensure fair and ethical business practices by international shipping companies, including the work of the Competition Bureau to join the competition authorities of the United States, Australia, New Zealand, and the United Kingdom in sharing information to identify and prevent potentially anticompetitive conduct.

Regulatory alignment with our trading partners is vital to bolstering economic competitiveness within the fresh fruit and vegetable sector, which is highly integrated around the globe. We cannot emphasize strongly enough the need for the Government of Canada to work across departments and with provincial, territorial and international partners to address these issues in a multi-lateral and holistic manner. As a smaller market reliant upon trade, it is imperative for the federal government to take a leadership role in these discussions to ensure Canada’s needs and interests are represented and that there is not an economic incentive for companies to redirect their business elsewhere.

Q5: Are there areas where regulations and processes could be simplified or streamlined to reduce administrative burdens on operators/companies within the supply chain? Are there examples where regulations, requirements or processes are preventing the introduction or use of innovative technologies or processes?

As noted above, the competitiveness of the Canadian fresh produce industry is impacted by a complex regulatory environment that sometimes results in duplicative or contradictory requirements across multiple departments. The resulting cumulative regulatory burden puts a strain on the sector's operational efficiency and increases costs.

Conflicting objectives across departments can also inadvertently impact the fresh produce sector. For example, government policies targeting packaging or emissions may have unintended consequences on international trade, transportation logistics and product shelf-life. In the fall of 2023, CPMA and produce industry stakeholders and partner associations, undertook extensive research to both qualify and quantify the potential impacts of Environment and Climate Change Canada's proposed PLU ban regulation and the proposed Pollution Prevention Plan Notice for Primary Food Packaging. At a time when the Government of Canada is focused on addressing rising food prices, a [study by Deloitte Canada](#) found that ECCC’s proposed regulatory and policy actions could increase the cost of fresh produce by 34% over current levels and reduce fresh produce availability to Canadians by over 50%, with a disproportionate impact in rural and remote regions of Canada. In addition, multiple studies confirmed that ECCC’s proposals could actually increase both the production and release of greenhouse gases from the produce supply chain, as well as increase fresh produce food waste, by more than 50% over current levels ([Deloitte Canada](#), [QfreshLAB](#), [VCMI](#)).

CPMA reiterates that the Government of Canada should implement a consistent competitiveness lens to regulation-making and review, commit to the cross-department deployment of resources to foster better government understanding of the impacts of proposed policy and regulations, consider cumulative

regulatory burden, and ensure that one department's regulations do not hinder industry's ability to be compliant with another department's regulations or meet government targets.

A strong, growing and sustainable Canadian produce industry will depend on our ability to leverage innovation. Global advancements in agricultural biotechnology, from gene-editing to robotics to data enabling tools to support precision agriculture have the potential to accelerate the reduction of GHG emissions and the transition to more sustainable practices.

In a 2021 report, the U.S. Environmental Protection (EPA) Agency Emerging Agricultural Technologies Working Group noted: “Emerging technologies such as drones, sensors, and robotics are already being adopted by farmers globally to optimize agronomic inputs and increase efficiency while maintaining or improving protection of human health and the environment. Such optimization and the introduction of other components of precision farming like the use of data science to guide agronomic decisions should lead to changes in the regulatory approach”.

As mentioned above, cross-department and agency consideration and collaboration is also necessary to ensure that Canadian supply chains can realize the benefits of the many technological innovations becoming available to enable more sustainable practices. For example, innovations in the drone application of pesticides offer significant promise, both in terms of more targeted pesticide use as well as decreased crop protection costs for growers. However, a regulatory process involving PMRA is required to enable their use in Canada, and this process must therefore be accounted for in planning and policy development by other departments involved.

Finally, growers and other businesses across the produce supply chain are investing in automation and innovative new systems to support sustainability efforts, but it is important to recognize that investment in, and implementation of, these types of innovations requires both financial and human resources. The pandemic, supply chain disruptions and the current inflationary environment have made finding these resources more difficult for many. Reducing regulatory and administrative burden can contribute to the mitigation of costs associated with implementing new technologies and processes and can help to facilitate their adoption.

Thank you for taking the time to review our comments. CPMA and Canada’s fresh produce industry are keen to partner with the government to support an effective National Supply Chain Strategy and ensure the success of its Regulatory Modernization agenda.

Regards,

A handwritten signature in black ink, consisting of a stylized 'R' followed by a horizontal line.

Ron Lemaire
President
Canadian Produce Marketing Association