



Global Affairs Canada  
Trade Policy and Negotiations Division  
Global Affairs Canada  
111 Sussex Drive  
Ottawa, ON K1A 0G2

July 31, 2024

**RE: *The General Review of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)***

To Whom It May Concern:

On behalf of the Canadian Produce Marketing Association, it is my pleasure to provide comments to the Government of Canada for its review of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).

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

**Comments**

Promoting international trade and building and maintaining relationships with import and export markets is a key strategic priority for the Canadian fresh fruit and vegetable sector.

The fresh produce supply chain generates over \$15 billion annually in GDP and supports over 185,000 jobs communities across Canada<sup>1</sup>. While the fresh fruit and vegetable production is a vital part of the fabric of our rural and urban landscape, supporting the growing and selling of a range of Canadian-grown products, we also rely heavily on our global partners to supply Canadians with our safe and healthy products year-round. In fact, due to our colder climate and shorter growing season, coupled with a demand for a wide variety of products, 4 out of 5 dollars spent on fresh fruit and vegetables in Canada is spent on imported product.

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<sup>1</sup> Conference Board of Canada, 2023

At the same time, trade flows have fluctuated over the past few years due to escalating geopolitical conflicts, supply chain disruptions, and extreme weather events. It is more and more important that Canada enables free trade agreements that enable importers to pivot and adjust their buying behaviour if these issues impact the flow of fresh fruit and vegetables.

With these factors in mind, CPMA welcomes the opportunity to provide comments on behalf of Canada's fresh produce sector regarding the general review of the provisions within the CPTPP agreement.

*Discussion questions: Since entry into force of the Agreement, have you used any of the CPTPP provisions? In your experience, what have been the advantages of the CPTPP? What have been the shortcomings?*

CPMA recognizes that in terms of benefits, the CPTPP has helped improve market relations across the Asia-Pacific region as well as provided room for a much more diversified level of trade.

Even despite the economic impacts and supply chain disruptions caused by the COVID-19 pandemic, Canada still saw an increase in both import and export trade with CPTPP member countries, with a relatively steady upwards trend. Following the coming into force of the agreement in 2018, we have seen the following changes in fresh fruit and vegetable trade:

- Total fresh fruit and vegetable exports to CPTPP member countries grew from nearly \$30.5 million in 2018 to \$31.6 million in 2023, with apples and cherries as key export commodities. At the same time, it is worth noting that 2023 represents a decrease from our peak of \$40.3 million in 2022, pointing to a potential area for further government consideration.
- Total fresh fruit and vegetable imports from CPTPP members increased more substantially, rising from \$2.5 billion in 2018 to nearly \$3.6 billion in 2023, reflecting a growth of 43%, led by berries, grapes, and stonefruit, as well as commodities not grown in Canada, such as guava, mangos and pineapples<sup>2</sup>.

Overall, this growth highlights the CPTPP's role in expanding Canada's access to the markets, which has not only encouraged a stronger relationship with FTA partners, but also diversified trade portfolio.

*Discussion questions: Do you have suggestions on how to encourage greater use of the CPTPP by all groups (including SMEs, Indigenous, women-owned businesses) to improve the uptake of the Agreement? In other words, how could Canada and other CPTPP members support and enhance the use of the CPTPP?*

Focusing on international standardization between government bodies is key to the success of the Canadian industry in gaining market access, particularly for the fresh produce sector, which is one of the most global supply chains in the world. CPMA emphasizes that Canada's free trade agreements can and should support regulatory harmonization that can lead to the adoption of higher standards and regulations across countries – ensuring that products and services meet the same safety and quality standards, while also reducing regulatory burden and associated compliance costs, and supporting competitiveness for businesses.

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<sup>2</sup> Statistics Canada, 2024

Cumulative regulatory burden has particular impacts on small- and medium-sized businesses, many of which lack the human and financial resources to support dedicated personnel to monitor and adapt to regulatory changes. As the Government of Canada advances its trade agenda, a cross-government lens is required to reduce burden for industry and consider the needs of small- and medium-sized businesses to ensure they can also realize the benefits of the agreements such as the CPTPP.

*Discussion questions: Are there existing provisions in the Agreement that would benefit from revision or updating? Do you have suggestions to improve and/or modernize the Agreement, including to address emerging issues such as digital and green economy, supply chain resilience, inclusive trade, and innovation?*

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.

Last year, the [Global Coalition of Fresh Produce](#) released a report calling upon national and international policymakers to urgently implement several measures to safeguard the supply of affordable fresh fruits and vegetables to consumers worldwide – and ensure the viability of a sector that is an important contributor to the economies of developed and developing countries alike<sup>3</sup>. The report highlighted non-tariff trade barriers as obstacles to international trade in the fresh produce sector.

CPMA reiterates free trade agreements can and should support regulatory harmonization between trading partners. Phytosanitary and other requirements that are not science-based or essential to security act as effective non-tariff trade barriers between trading partners and must be eliminated. Furthermore, sound science transcends borders – more effort should be made to reduce duplication and lengthy review periods by recognizing the science of reputable bodies in other countries to facilitate a more efficacious approach to regulation and policy.

The ability of the Canadian fresh fruit and vegetable industry to access a new import or export market is dependent upon the recognition of trading partners' plant protection systems. Any changes to the CPTPP should ensure that the Agreement creates the foundation for future discussions on mutually recognizing food safety systems, while ensuring that the existing food safety systems across CPTPP member countries do not negatively impact our domestic industry.

In terms of promoting a level playing field, regulatory alignment with our trading partners is vital to supporting economic competitiveness and increasing market access for Canadian agricultural operations within the globally integrated fresh fruit and vegetable sector. CPMA urges the Government of Canada to explore opportunities within the CPTPP to facilitate the approval of innovative products so that they can

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<sup>3</sup> [Global Value Chains for Produce: An Urgent Call for Policy Measures](#), Global Coalition of Fresh Produce, January 2023

enter the Canadian market at the same time as they become available for our trading partners, maintaining the Canadian industry's competitiveness.

As representatives of a highly globally integrated industry, CPMA is strongly supportive of the Canadian government's progressive trade agenda and its commitment to strengthen our trading partnerships around the world. We emphasize that the Government of Canada must recognize food as an essential item in framing our trade agreements, with the fundamental goal to support our domestic markets while strengthening food security and ensuring product diversity for Canadians.

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

Regards,

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

Ron Lemaire  
President  
Canadian Produce Marketing Association