



**Written Submission to Department of Finance Canada
Consultations in Advance of the 2022 Budget**

**Submitted By: The Canadian Produce Marketing
Association**

Date: February 25, 2022

List of Recommendations

To help position the Canadian fresh produce industry to succeed now, and in a post-pandemic world, CPMA recommends that, in Federal Budget 2022, the Government of Canada should:

Supply Chain Disruptions

1. Provide funding to support the work of a Supply Chain Commissioner leading the Supply Chain Task Force in bringing departments and stakeholders together to effectively address supply chain disruptions in the short-term and to work to advance supply chain resiliency in the long-term.
2. Include resources for the Government of Canada to work proactively with port authorities and other stakeholders to put in place a formalized process to allow the movement of essential goods, such as food and medical supplies, through Canada's ports of entry in the event of future emergency events or disruptions.

Financial Protection for Produce Sellers

3. Create a limited statutory deemed trust, similar to the U.S. *Perishable Agricultural Commodities Act*, to support needed liquidity and provide financial protection to produce sellers.

Sustainability

4. Provide reasonable and fair recognition for past efforts to reduce greenhouse gas emissions and implement more environmentally sustainable practices, including in the development of any carbon offset credit system.
5. Include sufficient resourcing to ensure the National Index on Agri-Food Performance meets its strategic purposes, as well as support for a partnership with the federal government to leverage the sustainable practices of Canada's agricultural sector.
6. Develop a long-term strategy for sustainable water management for all Canadians, including ensuring a secure source of water for agriculture.

Plastics

7. Work closely with industry to take a systems approach to find solutions to reduce plastic waste that are evidence-based, and include a combination of education, innovation, new legislative tools, and critical infrastructure investments.
8. Provide federal leadership and funding to the development of harmonized, efficient and cost-effective recycling collection within communities across Canada.

Labour

9. Recognize the ongoing nature of increased costs growers are assuming due to the COVID-19 pandemic by committing to measures to help growers manage costs associated with housing reforms and health and safety requirements.

10. Include resources to improve service standards and processing times for applications under the Seasonal Agricultural Worker Program and the Agricultural Stream of the Temporary Foreign Worker Program, including by working with source countries and implementing measures to further streamline the collection of biometrics as well as the visa and work permit application processes.
11. Commit to streamline and standardize the Labour Market Impact Assessment application process through the implementation of a Trusted Employers system, as included in the mandate letters for the Minister of Immigration, Refugees and Citizenship and Minister of Employment, Workforce Development and Disability Inclusion.
12. Support the implementation of an Emergency Foreign Workers Program, as outlined in the submission made by Food and Beverage Canada.

Strengthening Canada's Food System

13. Provide ongoing financial support to achieve the targets of the Food Policy for Canada and to support the work of the Food Policy Advisory Council.
14. Commit to support measures promoting the *Canada Food Guide* recommendation to fill *Half Your Plate* with fruits and vegetables, including through funding to advance the development of a National School Food Policy and a national school nutritious meal program.
15. Provide federal funding and resources to support expanded efforts to reduce food loss and waste across the supply chain.

Innovation and Infrastructure

16. Provide innovation funding and whole-of-government support specific to the fresh produce supply chain, to bolster our industry's ongoing competitiveness.
17. Support small- and medium-sized businesses making the shift to digital and ensure sufficient, dedicated funding to support the rapid expansion of high-speed internet infrastructure and cell phone service coverage for all Canadians and Canadian businesses.
18. Deliver sufficient, dedicated federal funding to invest in rural infrastructure, including roads, energy, and service infrastructure, such as waste management.

Trade and Market Access

19. Dedicate federal government resources to advance Canada's free and fair trade agenda and enable further expansion of mutual recognition efforts with key trading countries.
20. Support measures to enhance government oversight of Canada's ports and to help businesses more seamlessly access international markets through our commercial border.

21. Include 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.
22. Support work across departments to expand Trusted Trader programs to further streamline the movement of essential and perishable products across the Canadian border.

Effective Regulatory Modernization Through Meaningful Consultation

23. Undertake a comprehensive review of the regulatory modernization process and better facilitate thorough stakeholder participation.

Introduction

The COVID-19 global pandemic has created unprecedented public health, economic, and logistical challenges for communities and supply chains around the world. The Canadian fresh fruit and vegetable industry has been no exception.

Almost two years since the start of the pandemic, substantial increases in costs and delays along the supply chain 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. 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.

The fresh fruit and vegetable industry is a major contributor to Canada's GDP and to job creation from coast to coast to coast, and we will continue in this role as we move forward, but government action is required to support supply chain resiliency and position our sector for success, now and in a post-pandemic world. The Canadian Produce Marketing Association (CPMA) is therefore pleased to offer our recommendations to Department of Finance Canada consultation in advance of the 2022 federal budget.

Supply Chain Disruptions

Since last fall, CPMA has been working with industry partners to call for the naming of a Supply Chain Commissioner to lead a Joint Industry-Government Task Force to address the significant impacts of supply chain disruptions. In November, CPMA and other 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, growing input shortages and stockpiling of consumer products. Earlier this month, CPMA's North American Trade Working Group released a [Supply Chain Solutions proposal](#), which outlined several potential areas of government action.

We are hopeful that the recent National Supply Chain Summit will serve as the starting point for effective cross-governmental collaboration to address the interconnected, ongoing supply chain disruptions having a significant impact on the fresh produce sector. In the United States, the Biden Administration has been actively engaged in efforts to address these issues, including through the appointment of John Porcari as Port Envoy to the White House's Supply Chain Task Force. As a smaller market reliant upon trade, it is imperative for the federal government to demonstrate similar leadership 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.

CPMA welcomes the January 31st announcement that the Government of Canada will create a new Supply Chain Task Force to consult with industry and other key stakeholders to make recommendations on short and long-term actions to mitigate the impact of ongoing supply chain disruptions. At the same time, we cannot emphasize strongly enough the importance of a whole-of-government approach to be able to recognize, understand and address the multi-faceted challenges at hand.

Recognizing that these issues do not fall within the purview of any individual Minister or department, a Supply Chain Commissioner would play a crucial role in bringing the necessary stakeholders to the table and providing transparency and accountability for finding solutions. **Therefore, CPMA recommends that**

Federal Budget 2022 should provide funding to support the work of a Supply Chain Commissioner leading the Supply Chain Task Force in bringing departments and stakeholders together to effectively address supply chain disruptions in the short-term and to work to advance supply chain resiliency in the long-term.

Additional key considerations for the structure of the proposed Supply Chain Commissioner and Joint Industry-Government Task Force include:

- The Supply Chain Commissioner must be mandated and empowered to bring together the necessary stakeholders to effectively address the complicated and interconnected supply chain disruptions we are facing. This person should have the reputation and authority to be able to deliver on this task.
- The Supply Chain Commissioner should be independently empowered to bring decision-makers from all applicable government departments to the table (including, but not limited to, Agriculture and Agri-Food Canada, Employment and Social Development Canada, Transport Canada, Global Affairs Canada, the Canada Border Services Agency, and the Canadian Food Inspection Agency). Given the urgency of the situation, these participants should be authorized to negotiate, find solutions and make decisions on behalf of their respective organizations.
- In addition, stakeholders from across the supply chain must be included to find workable solutions that do not result in unintended consequences or compounding of problems. These should include: port authorities, terminal operators, shipping companies, carriers and freight forwarders, railways, trucking associations, agricultural and other commodity associations (including both perishable and non-perishable products), importers and exporters, as well as associated labour unions.
- The Supply Chain Commissioner and the Joint Industry-Government Task Force should also be empowered to work with international partners, particularly our partners in *CUSMA*, to find solutions to challenges of common concern and to avoid creating unintended barriers to trade.

The work of the Supply Chain Commissioner and Task Force should provide the starting place for longer-term, ongoing collaboration between government departments and stakeholders to identify, assess and respond to supply chain issues in the future. To begin, **CPMA recommends that Federal Budget 2022 should include resources for the Government of Canada to work proactively with port authorities and other stakeholders to put in place a formalized process to allow the movement of essential goods, such as food and medical supplies, through Canada’s ports of entry in the event of future emergency events or disruptions.**

Financial Protection for Produce Sellers

The Canadian produce industry has been requesting the implementation of a financial protection tool for produce sellers for many years. Growing, harvesting, packing, and marketing fruits and vegetables comes with many risks. Overhead and capital costs continue to rise, while returns are delayed until payment is collected down the supply chain – often long after the product has been purchased and consumed. Unfortunately, the COVID-19 pandemic has put growers in an even more vulnerable position.

Across our supply chain, the fresh fruit and vegetable industry has incurred unprecedented costs to develop COVID-related business plans and new procedures to address the spread of COVID-19, and to mitigate the impact of the pandemic on their business and community. As multiple waves of the pandemic have rolled across the country, rotating lockdowns and business closures, as well as ongoing supply chain

disruptions, have dramatically impacted produce buyers, particularly in the Canadian restaurant and hospitality sector. In fact, according to Restaurants Canada, 90% of foodservice businesses have relied on federal rent and wage subsidies to help them survive the pandemic and, even so, 80% of operations have either been consistently losing money since the first wave of lockdowns ended, or scraping by with a profit margin of 2% or less¹. In such an untenable situation, we can anticipate that many businesses will be driven into bankruptcy, with impacts along the supply chain and, ultimately, to the fruit and vegetable growers who supply these businesses. This concern has already been realized: in October 2021, a New Brunswick-based produce retailer declared bankruptcy with more than \$3 million left owing to creditors, including farms and produce wholesalers.

The *Bankruptcy and Insolvency Act* was framed to provide farmers/produce sellers with “super priority” status; however, the existing provision under the *Act* does not provide a workable mechanism when buyers of fresh produce become insolvent. While the *Act* allows suppliers to recover their product following a bankruptcy, it provides no rights when the product has been resold or is no longer identifiable or in the same state. The high perishability of fresh fruits and vegetables means that they would rarely be available for repossession. The existing “super priority” provision for farmers also requires that product must have been delivered within 15 days of the bankruptcy, failing to address the needs of fruits and vegetable suppliers, who regularly receive payment 30 days (or more) after product is delivered.

It is important to note that the implementation of a deemed trust mechanism for produce sellers in Canada would not require any additional government funds, nor would it undermine existing tools under the *Bankruptcy and Insolvency Act*.

In addition to a lack of domestic protection, Canadian produce sellers are now at even more risk when selling to our major trading partner, the United States. The lack of comparable insolvency protection in Canada led to the loss of our preferential treatment in the U.S. under the *Perishable Agricultural Commodities Act (PACA)*, which provided much needed access to prompt payment tools in the case of disputes, but the commitment exists from the U.S. to reinstate this treatment when Canada has similar protection in place. In the interim, Canadian sellers are now required to post a bond worth double the value of the shipment just to initiate a formal dispute claim through *PACA*, forcing Canadian exporters to walk away from these lost sales and putting them at a competitive disadvantage.

The implementation of a Canadian limited statutory deemed trust, operating similarly to the U.S. *PACA*, would effectively protect produce sellers during bankruptcy in Canada, bring our sector in line with the intent of the super priority for farmers under the current *Bankruptcy and Insolvency Act*, and open the door to the reinstatement of preferential treatment under *PACA* when selling product to the U.S – all with no cost to the government. **CPMA therefore recommends that Federal Budget 2022 should include a commitment to create a limited statutory deemed trust, similar to the U.S. *Perishable Agricultural Commodities Act*, to support needed liquidity and provide financial protection to produce sellers.**

Sustainability

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

¹ Source: [Restaurants Canada, 2021](#).

will also be a key partner in tackling climate change and in positioning Canada as a leader in the transition to a global green economy.

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 Federal Budget 2022 include measures to provide reasonable and fair recognition for past efforts to reduce greenhouse gas emissions and implement more environmentally sustainable practices, including in the development of any carbon offset credit system.**

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](#) and is now developing 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 Federal Budget 2022 include sufficient resourcing to ensure the National Index on Agri-Food Performance meets its strategic purposes, as well as support for a partnership with the federal government to leverage the sustainable practices of Canada's agricultural sector.**

Finally, water supply and access are also 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 Federal Budget 2022 should commit to the development of a long-term strategy for sustainable water management for all Canadians, including ensuring a secure source of water for agriculture.**

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 partnership in 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.

Our work supports an environment of innovation and collaboration that the Government of Canada can harness and build upon to effectively reduce the use of unnecessary and problematic plastics. Federal and

provincial incentives must be put in place to further support industry efforts. **CPMA recommends that Federal Budget 2022 should include a commitment to work closely with industry to take a systems approach to find solutions to reduce plastic waste that are evidence-based, and include a combination of education, innovation, new legislative tools, and critical infrastructure investments.**

To reduce the use of unnecessary and problematic plastics, 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. Without this critical infrastructure in place, industry transitions to recyclable or compostable packaging materials will be rendered futile. **CPMA therefore strongly recommends that Federal Budget 2022 should include a commitment to provide federal leadership and funding to the development of harmonized, efficient and cost-effective recycling collection within communities across Canada, a commitment of utmost importance in supporting a circular economy.**

Labour

The fresh fruit and vegetable industry relies upon thousands of workers coming into Canada as part of the Temporary Foreign Worker Program (TFWP) and the Seasonal Agricultural Worker Program (SAWP) to plant, cultivate, process, harvest and pack our products. Canadian horticulture relies more heavily on international workers than do other segments of agricultural production, with 43% of horticultural workers coming from outside Canada, (compared to 17% for the rest of agriculture), and 61% of horticultural farmers hiring foreign workers, (compared to 35% of the rest of agriculture).

Throughout the COVID-19 pandemic, the logistical challenges of bringing in employees through the TFW program have posed a considerable threat to food production, food security and the integrity of the food supply chain in Canada. Growers have incurred significant added costs to follow public health protocols and ensure the health and safety of their workers, as acknowledged in Employment and Social Development Canada's 2021 report, *What We Heard: Consultations on Accommodations for Temporary Foreign Workers* – and these protocols are likely to remain in place for the foreseeable future, with an ongoing impact on domestic production. **CPMA recommends that Federal Budget 2022 recognize the ongoing nature of increased costs growers are assuming due to the COVID-19 pandemic by committing to measures to help growers manage costs associated with housing reforms and health and safety requirements.**

Even prior to the COVID-19 pandemic, the labour gap in horticulture was becoming a crisis, expected to increase to 46,500 jobs by 2025 – the largest labour gap in the agricultural sector. Bridging the labour gap is critical to ensuring the success of the Canadian fresh produce industry in both the short and longer term. **CPMA therefore recommends that Federal Budget 2022 include resources to improve service standards and processing times for applications under the Seasonal Agricultural Worker Program and the Agricultural Stream of the Temporary Foreign Worker Program, including by working with source countries and implementing measures to further streamline the collection of biometrics as well as visa and work permit application processes.**

CPMA further recommends that Federal Budget 2022 should commit to streamline and standardize the Labour Market Impact Assessment application process through the implementation of a Trusted Employers system, as included in the mandate letters for the Minister of Immigration, Refugees and Citizenship and Minister of Employment, Workforce Development and Disability Inclusion.

It is also important to note that the impacts of the pandemic have seen labour shortages expand across the fresh produce supply chain, from farm gate to dinner plate. Even prior to the beginning of the Omicron wave in Canada, a survey of CPMA members in October 2021 found labour shortages reported by 92% of growers, 75% of wholesalers, and 100% of retailers, with the most significant gap reported in warehouse labour. Canada's food and beverage manufacturers are currently facing a debilitating workforce crisis, with vacancy rates across the sector averaging 25%.

CPMA is supportive of the directive in the mandate letters of the Minister of Agriculture and Agri-food and the Minister of Employment, Workforce Development and Disability Inclusion to “develop a sector-specific Agricultural Labour Strategy to address persistent and chronic labour shortages in farming and food processing in the short and long term”.

In the short-term, industry requires immediate measures to address today's labour crisis and to stabilize the workforce. In December 2021, CPMA was among eleven industry associations that presented the federal government with a proposal for an 18-month Emergency Foreign Workers Program to allow for additional foreign workers to come to Canada to support the food and beverage manufacturing sector, while also offering them real pathways to permanent residency. Recognizing the urgency of the current labour challenges we face, **CPMA recommends that Federal Budget 2022 should support the implementation of an Emergency Foreign Workers Program, as outlined in the submission made by Food and Beverage Canada.**

Strengthening Canada's Food System

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. **CPMA recommends that Federal Budget 2022 include a commitment to provide ongoing financial support to achieve the targets of the Food Policy for Canada and to support the work of the Food Policy Advisory Council.**

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 annually². CPMA's [Half Your Plate](#) campaign is working to increase fresh produce consumption in Canada, but more support is needed. **CPMA recommends that Federal Budget 2022 should commit to support measures promoting the *Canada Food Guide* recommendation to fill *Half Your Plate* with fruits and vegetables, including through funding to advance the development of a National School Food Policy and a national school nutritious meal program.**

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

² Source: *Krueger Report*, 2016

the Food Waste Reduction Challenge. **CPMA recommends that Federal Budget 2022 should provide federal funding and resources to support expanded efforts to reduce food loss and waste across the supply chain.**

Innovation and Infrastructure

A strong and growing Canadian produce industry will depend on our ability to leverage innovation. Agriculture, including the fresh produce industry, has the potential to act as the backbone of Canada's economic recovery from the COVID-19 pandemic, but more investment is needed to support our sector's growth. A [2019 RBC report](#) found that Canada's share of global AgTech investment is only 3.4%, falling behind countries such as Brazil and India. **CPMA recommends that Federal Budget 2022 provide innovation funding and whole-of-government support specific to the fresh produce supply chain, to bolster our industry's ongoing competitiveness.**

Effective COVID-19 recovery must also include looking at how the business environment may change permanently. One example is the marked acceleration of trends towards online purchasing, delivery and curbside pick-up. The growth of e-commerce and increased government digitization efforts make access to broadband internet and cell phone coverage even more important. As noted by the Agri-Food Economic Strategy Table, the lack of digital infrastructure remains a major roadblock to innovation for businesses in the fresh produce industry and renders many businesses in rural, remote and Indigenous communities unable to reap the full benefits of digitization. **In light of the market shifts resulting from the COVID-19 pandemic, CPMA recommends that Federal Budget 2022 include a commitment to support small- and medium-sized businesses making the shift to digital and to ensure sufficient, dedicated funding to support the rapid expansion of high-speed internet infrastructure and cell phone service coverage for all Canadians and Canadian businesses.**

In addition, rural communities across Canada need greater investments in critical infrastructure to support their economic development now and into the future. **CPMA recommends that Federal Budget 2022 should deliver sufficient, dedicated federal funding to invest in rural infrastructure, including roads, energy, and service infrastructure, such as waste management.**

Trade and Market Access

To ensure the ongoing viability of the food system and support Canada's economic recovery from the COVID-19 pandemic, we need a strong domestic and global strategy. Free and fair international trade in fresh produce offers huge economic growth opportunity for Canadian businesses and provides Canadians with access to safe and healthy fresh food options year-round.

Increasing market access and sustainability of the Canadian fresh fruit and vegetable industry requires mutual recognition of food safety systems, and international harmonization of crop protection regulation, products, and residues, to support the competitiveness of Canadian products in the international marketplace. Phytosanitary and other requirements that are not science-based or essential to security act as effective non-tariff trade barriers between countries and must be eliminated. **CPMA recommends that Federal Budget 2022 should dedicate federal government resources to advance Canada's free and fair trade agenda and enable further expansion of mutual recognition efforts with key trading countries.**

At the same time, 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. Therefore, the smooth flow of essential products through Canada's ports is critical to supporting both our economic competitiveness and food security across the country. **CPMA recommends that Federal Budget 2022 include measures to enhance government oversight of Canada's ports and to help businesses more seamlessly access international markets through our commercial border.**

We were pleased to see the Budget 2021 commitment to funding of \$1.9 billion over four years for the National Trade Corridor Fund, as well as recent additional funding announcements to improve the fluidity of supply chains. **CPMA recommends that Federal Budget 2022 include 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.**

In addition to resources for critical infrastructure investments, **CPMA recommends that Federal Budget 2022 should support work across departments to expand Trusted Trader programs to further streamline the movement of essential and perishable products across the Canadian border.** The parameters of existing programs, particularly requirements from other government departments such as CFIA, have posed a barrier to produce industry participation in these programs. However, the recent implementation of the *Safe Food for Canadians* licensing system and the MyCFIA portal offer potential tools to leverage to ease border clearance processes for industry members who have a demonstrated history of regulatory compliance.

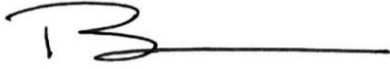
Effective Regulatory Modernization Through Meaningful Consultation

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. A collaborative approach to find workable solutions for industry and government is the backbone to success for regulatory and policy compliance.

While the government's move toward increased consultation with industry is welcome, work remains to ensure that these consultations provide benefit to both government and stakeholders, allow the government to better understand the administrative or other costs of proposed changes, and support the development of effective regulations that meet the needs of both industry and the Canadian public, without stifling economic competitiveness. **CPMA recommends that Federal Budget 2022 should include a commitment to undertake a comprehensive review of the regulatory modernization process and better facilitate thorough stakeholder participation.**

CPMA appreciates the opportunity to submit comments to the Department of Finance Canada regarding Budget 2022 and to provide recommendations on how the Government of Canada can support the Canadian fresh produce industry in its recovery from the COVID-19 pandemic. We thank you for your consideration of our submission and would be pleased to answer any questions you may have.

Sincerely,

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

Ron Lemaire
President

About CPMA

Founded in 1925, the Canadian Produce Marketing Association (CPMA) represents domestic and international members across the entire fresh fruit and vegetable supply chain, from the farm gate to the dinner plate. Our comments are reflective of a wide array of members who are responsible for 90% of fresh fruit and vegetable sales in Canada, working daily to provide Canadians with the fresh and healthy fruit and vegetable options they need and demand.