



Agriculture and Agri-food Canada  
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March 31, 2023

**RE: Consultation to inform a Sustainable Agriculture Strategy**

To Whom It May Concern:

On behalf of the Canadian fresh fruit and vegetable industry, we welcome the opportunity to provide comments to the Agriculture and Agri-food Canada (AAFC) consultation to inform a Sustainable Agriculture Strategy.

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

**General comments**

- CPMA supports the development of a Sustainable Agriculture Strategy and welcomes the Government of Canada's continued implementation of programs supporting the adoption of more environmentally sustainable practices. Indeed, the Strategy can serve as an important tool to support a strengthened Canadian food system and food security for all Canadians, and should work to frame food production and access to food as a whole-of-government priority.
- We are also supportive of the Government's stated commitment to supporting the agricultural sector as key partners in tackling climate change and promoting environmental sustainability. The agricultural sector is on the front lines when it comes to facing the challenges of a changing climate and environmental sustainability. We are working to ensure the economic viability of our sector and the wellbeing of the people and the planet that support it.
- CPMA is proud to represent an industry whose members have been stewards of the land, and leaders in implementing sustainable practices, long before sustainability became a core value for organizations, government and society as a whole. The fresh produce sector has shown leadership in addressing areas such as biodiversity, greenhouse gas emissions and carbon sequestration, food loss and waste, renewable energy, soil health, water conservation, sustainable packaging and

others. [Examples of the sustainability initiatives of some of our members have been shared on CPMA's website.](#)

- Canada's ambitious emissions reduction targets will require continued focus in Federal Budget 2023 and beyond, as well as further investment throughout the entire agriculture and food value chain. CPMA urges the federal government to support measures to help businesses identify available environmental programs and navigate the complexity and diversity of available supports to avoid limited program uptake due to confusion and/or lack of awareness.
- As noted above, Canadian fruit and vegetable growers have been implementing more environmentally sustainable practices for many years, providing benefits to carbon sequestration and other ecological services in Canada. It is imperative that the Sustainable Agriculture Strategy, and initiatives such as carbon offset credit systems, provide reasonable and fair recognition for past efforts to reduce greenhouse gas emissions and implement more environmentally sustainable practices that can meet the necessary reporting criteria, to ensure that industry leaders (and not only new investments) are rewarded.
- Over the past few years, the impacts of the COVID pandemic, supply chain disruptions and extreme weather events have demonstrated the intricately interconnected nature of our food system – and how impacts in one area can have significant ripple effects elsewhere. While AAFC's proposal is focused on primary agriculture and other on-farm activities, such as packing, CPMA strongly emphasizes that the Sustainable Agriculture Strategy should apply a total food system lens and must also account for the specific needs and challenges of different agricultural sectors, including the fresh produce sector, to support effective solutions and avoid unintended consequences along the food supply chain.
  - For example, retail and other buyers are increasingly responding to consumer demand for improved sustainability outcomes by deploying plans that include substantial expectations for suppliers in areas such as packaging, improvement in farm management, biodiversity, food waste, and more. These buyer expectations will undoubtedly impact on-farm activities, and the financial and human resources available to meet separate government sustainability targets, and should therefore be considered in the development of the Sustainable Agriculture Strategy to avoid negative impacts and additional burden for growers.
  - A total supply chain lens is also necessary to effectively mitigate the environmental impacts of food loss and waste, a major contributor to greenhouse gas emissions. The Sustainable Agriculture Strategy should therefore deliver federal funding and resources for expanded efforts to reduce food loss and waste across the supply chain to build upon the work of the Surplus Food Rescue Program and the Food Waste Reduction Challenge.
- In addition, multiple federal departments and other levels of government must be actively engaged in the development and implementation of the Sustainable Agriculture Strategy. Just as it is critical for the Sustainable Agriculture Strategy to apply a total supply chain lens in order to be successful and avoid negative impacts in our complex food system, it is also crucially important for the Strategy to be undertaken as a whole-of-government initiative that breaks down departmental/jurisdictional silos to better enable the identification, resourcing and deployment of effective, collaborative climate solutions.

- For example, 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. Water supply and access are 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. Canada can learn from the crisis situation in the U.S. and work with provincial, territorial and municipal partners to build resiliency into our water supply. 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.
- Furthermore, the Canadian produce industry continues to be deeply engaged in efforts to reduce and mitigate the use of plastics and other packaging while also addressing the need to ensure food safety, minimize food waste and maintain food quality and affordability. CPMA has deliberately taken a leadership role in this space through the work of our CPMA Packaging Working Group and partnership in the Canada Plastics Pact to assist the produce industry in reducing plastic use and supporting the circular economy. Federal and provincial incentives must be put in place to further support industry efforts. Of utmost importance, Canada must address the challenge of fragmented collection systems across the country that do not effectively collect and recycle the materials 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, and confusion among Canadian consumers will minimize the potential positive impacts that a robust and standardized system would foster.
- It is also important to note that efforts in the U.S. related to the *Inflation Reduction Act* and the USDA’s Food System Transformation Framework offer examples of cross-department action to support a sustainable food system – but could also serve to put Canadian agriculture at a competitive disadvantage compared to American producers. Therefore, wherever possible, the Sustainable Agriculture Strategy should seek to align Canadian growers’ access to tools to support sustainability with those available south of the border.
- Finally, in addition to the comments shared here, CPMA also urges the government to consider the recommendations made by Fruit and Vegetable Growers of Canada (FVGC) in its efforts to develop a Sustainable Agriculture Strategy.

### **Sustainability standards, metrics, data and benchmarking**

- Across the agri-food sector, ambitious targets are being set to reduce the environmental footprint of producing and supplying food. Metrics and benchmarks are being increasingly deployed to operate, compete, and contribute to economic viability in this rapidly changing agri-food world.
- The fresh fruit and vegetable supply chain is one of the most globally integrated in the world, which poses complex challenges in advancing sustainability efforts. In November 2022, the International Federation for Produce Standards (IFPS), which includes both CPMA and FVGC, hosted an [online Sustainability Symposium](#). The Symposium brought together more than 250

participants from 22 countries across all continents to begin a global produce conversation towards harmonization in sustainability.

- Symposium participants agreed that there is an increasingly pressing demand for some form of sustainability-related accountability, leading to a growing number of standards aiming at certifying sustainability claims, whether practice- or outcome-based. However, these standards are often designed to address specific concerns, resulting in a landscape of partial and partly overlapping frameworks. Adding further complexity, buyer expectations may include meeting a particular standard in addition to other requirements to meet sustainability targets. This leads to organizations having to comply with a set of different standards to substantiate the very same practices or outcomes, multiplying the cost incurred without much value added. As noted above, buyer expectations should be considered in the development of the Sustainable Agriculture Strategy to avoid negative impacts and additional burden for growers.
- Symposium participants also noted that, while sustainability labelling claims can be an effective marketing strategy with consumers, without standardized definitions of terms such as “sustainable”, “sustainably grown”, “sustainably produced” and others, sustainability labelling could at best be considered misleading to consumers and at worst become an avenue for deliberate greenwashing. Either of these outcomes are ultimately counterproductive to achieving the objectives of the Sustainable Agriculture Strategy.
- Here at home, a private-public coalition of over 120 diverse partners, including CPMA, is working to establish Canada’s first agri-food sustainability index to demonstrate our country’s rightful place as a leader in sustainable, safe, and responsibly produced food. The 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 to align with global sustainability frameworks.
- It is also important to note that ensuring Canada can demonstrate the sustainability of our agricultural sector will contribute to strengthening and opening export markets, directly contributing to the long-term economic sustainability of agriculture in Canada.
- CPMA strongly urges the federal government to embrace this Index as an essential tool for enabling its Sustainable Agriculture Strategy and delivering on the Strategy’s vision and objectives. This includes providing sufficient resourcing to support the Index as a basis to benchmark sector progress, inform supporting policy and innovation, and demonstrate sustainability credentials and leadership in Canadian agriculture.

### **Future skills and technology needs**

- 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.

- CPMA emphasizes that the Canadian fresh fruit and vegetable sector needs access to utilize these tools in order to stay competitive globally. In fact, a 2019 [Royal Bank of Canada \(RBC\) report](#) found that with the right combination of skills, capital and technology, agriculture could add \$11 billion to Canada's GDP by 2030. However, [another RBC report](#) found that, in 2021, Canada's investments in climate related funding for agriculture was only 0.5% of farm receipts, compared to 1.7% for the U.S. and 1.8% for the E.U. Clearly, more investment is needed to support our sector's growth and long-term environmental and economic sustainability.
- At the same time, it must be noted that changes to the availability of current production technology and biotechnology tools have the potential to create unintended consequences which could see the increased use of land for agriculture. In Canada, [CropLife Canada estimates](#) that 50% more farmland would be needed to grow what we do today without pesticides and biotech crops – a land area equivalent to the combined area of the provinces of New Brunswick, Nova Scotia and Prince Edward Island. Increased land use that threatens natural habitats, wildlife and potentially biodiversity is of concern to the global community and this concern must be a cornerstone of decision-making that integrates a responsible and sustainable approach to production, especially as countries work to adopt the UN Sustainable Development Goals and as Canada seeks to meet its own terrestrial conservation targets.
- 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 note 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.
- The aging of the current population of farmers poses a significant challenge to the long-term sustainability of Canadian agriculture, as factors such as regulatory complexity, climactic pressures, and much more, act as barriers for young people and other new entrants to farming. At the same time, it is clear that the future fresh fruit and vegetable industry, and the agricultural sector more broadly, will require a workforce with a wide range of skills, including an increasing focus on expertise in areas such as robotics and artificial intelligence, software engineering and programming, green energy systems and data analysis.
- Given that many young and urban Canadians may not associate these disciplines with agriculture, the federal government has an important role to play in supporting educational efforts and raising awareness about the significant and diverse opportunities available in our sector. CPMA recommends that the government's promised National Agricultural Labour Strategy should consider and take into account the goals and objectives of the Sustainable Agriculture Strategy to ensure that the Canadian agricultural sector has the workforce needed to meet them. This includes ensuring access to technologies necessary to attract a younger demographic and improve productivity in the agricultural sector.
- 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 or of many innovative technological solutions becoming available. In fact, a [spring 2023 Auditor General report](#) confirmed that, at the end of 2021, only 59.5% of households in rural

and remote areas had access to minimum internet speeds, compared to 99.3% of households in urban areas. The report also noted “delays in the rollout of a number of federal connectivity initiatives, along with a small percentage of funding spent under these initiatives”.

- The Government of Canada must therefore 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, CPMA strongly supports the submission made by Telus Agriculture, including the recommendation that the Sustainable Agriculture Strategy must also include a digital policy to create the necessary supportive infrastructure and increased uptake of digital solutions as part of an emissions reduction strategy.

### **Regulatory agility and modernization**

- 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 – and to enable the Canadian agricultural sector to utilize the innovative tools becoming available to support the adoption of more environmentally sustainable practices. As noted by the [U.S. Environmental Protection \(EPA\) Agency Emerging Agricultural Technologies Working Group](#) in a 2021 report, ““A key component of ensuring that emerging technologies that enable precision agriculture and deliver on the goals of a more sustainable agriculture meet their full potential is their integration into the regulatory processes as an additional option for the farmer, providing access to a wide range of solutions while protecting human health and the environment.”
- CPMA emphasizes that 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.
- AAFC’s work thus far to engage with stakeholders in the development of the Sustainable Agriculture Strategy has been a promising beginning for those working within primary production. As noted above, CPMA emphasizes that the Sustainable Agriculture Strategy should apply a total food system lens and account for the specific needs and challenges of different agricultural sectors, including the fresh produce sector. We urge the government to expand its stakeholder engagement efforts on this Strategy moving forward to support effective solutions and avoid unintended consequences along the food supply chain.
- CPMA also emphasizes that, in the development and implementation of the Sustainable Agriculture Strategy, regulators should consistently apply a competitiveness lens, consider cumulative regulatory burden, and work across departments to avoid unintended negative impacts to food production, food security or industry’s capacity to meet government targets and priorities.
  - For example, the revisions made to the Test Market Authorization (TMA) process under the *Safe Food for Canadians Regulations* (SFCR) have effectively restricted the test marketing of new packaging configurations or grade specifications, as the regulations now allow TMAs to be granted solely to foods that have not been sold previously in Canada

and that differ substantially from any other food. Not only is this “new food” definition an almost impossible threshold for a fresh fruit or vegetable product to meet, but the lack of an effective test marketing mechanism significantly hinders the produce industry’s ability to implement changes necessary to adapt to adverse growing conditions due to weather, mitigate food waste and reduce the environmental impact of packaging. Particularly during a time of rising inflation and increased food insecurity, it is imperative that the regulatory environment supports innovation that benefits Canadians and strengthens our efforts towards a more sustainable food system.

- Cross-department and agency consideration and collaboration is also necessary to ensure that the Canadian agricultural sector 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. In order to meet the urgency of the climate challenge and achieve the Government of Canada’s environmental targets, regulators must have the resources and flexibility to undertake the necessary reviews and reforms in a timely manner.
  - Indeed, the [2021 report from the EPA 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”.
- Furthermore, CPMA would like to emphasize the importance of ensuring that fresh fruit and vegetable producers have access to, and can utilize, products and processes that ensure the sustainability of the industry and support food security, the lack of which can lead to unintended negative consequences on Canada’s ability to meet our sustainability goals. Given the linkages between sustainable production and the ability to decrease GHGs, government is encouraged to take a holistic view of how supporting a sustainable agri-food industry complements environmental targets.
  - We would like to reiterate the vital role that crop protection tools play in protecting our food and crops from invading weeds, insects, and disease. We acknowledge that pesticides must be used within the guidelines of good agricultural practices, which consider the needs of environmental quality and human health, as well as agricultural stability and effective pest management. The fresh produce industry has a long history of Integrated Pest Management (IPM) implementation, and given that many producers not just farm, but also live on the land where production occurs, they pay close attention to the crop protection tools used to ensure that crops can be brought to harvest safely.
  - In Canada, the pesticide approval process used is one of the toughest in the world and meets or exceeds the health standards established by the World Health Organization. It is also important to recognize that for many years, crop protection in Canada has included the widespread adoption of IPM on fruit and vegetable farms. Constant monitoring of



crops supports decision making, including plant protection products (PPP) use. Pesticides are not liberally applied; instead, application is guided by sophisticated data sets to maximize output and support sustainability of the land that farmers steward.

- In the fresh produce sector, production methodologies are rapidly improving and innovating – for some, like the greenhouse sector, this includes minimal amounts of PPP use and a reliance on IPM tools such as beneficials like insects and/or fungi that are active against pests. Innovation and rapid growth in growing environments such as vertical farming is also another type of production which has changed the use patterns of PPP.
- Organic production has a role to play in supporting the sustainability of Canadian agriculture. The Canadian Organic Standards provide the regulatory foundation for a strong and growing organic sector and are also a critical tool in negotiating beneficial equivalency arrangements with our trading partners. However, Canada’s current organic regulatory regime, which relies upon external bodies for the establishment and maintenance of the standards, differs from most other regulatory models in the world and leaves the sector relatively orphaned from government departments and agencies, including Agriculture and Agri-food Canada and the Canadian Food Inspection Agency. Greater federal support and ongoing government engagement is required in Federal Budget 2023 and beyond to ensure that the Canadian Organic Standards can continue to fulfill their important roles. The Government of Canada should allocate ongoing, dedicated resources to enable the cyclical review of the Canadian Organic Standards and take a more active and strategic role in the establishment and maintenance of the organic production standards and their harmonization with our largest international trade partners.
- At the same time, it is a global reality that much of fresh produce production will remain in a natural setting which will continue, by its very location, to be susceptible to insects, pests, invasive species, and disease, and the priority of all governments must be food security for the global population. Conventional production, as opposed to other production such as organic, will continue to represent the vast majority of global outputs of fresh fruit and vegetables and without the tools to ensure products reach harvest, well-intentioned efforts could result in devastating impacts to their availability. As an example, [CropLife Canada estimates](#) that 72% more fruit and 83% more vegetables can be grown every year by farmers in Canada than could be produced without the use of PPPs.
- Finally, CPMA emphasizes that regulatory alignment with our trading partners, particularly the U.S., is vital to ensuring Canada’s economic competitiveness within the fresh fruit and vegetable sector, which is highly integrated across the globe. In short, regulatory reform that supports future innovations, while avoiding uniquely Canadian regulatory requirements, can bolster a sustainable agriculture sector, strengthen our ability to meet the challenges of moving to a low carbon economy, and contribute to our competitiveness, now and into the future.

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. We would like to reiterate again that an effective Sustainable Agriculture Strategy should apply a total food system lens that considers each link in the food supply chain and must account for the specific needs and challenges of different agricultural sectors,



including the fresh produce sector. CPMA and our members are keen to partner with government to support this initiative and would be pleased to answer any questions you may have.

Regards,

A handwritten signature in black ink, appearing to be 'R. Lemaire', followed by a horizontal line extending to the right.

Ron Lemaire  
President  
Canadian Produce Marketing Association