



Red Tape Reduction Office
Ottawa, Ontario
Submitted via email: regulation-reglementation@tbs-sct.gc.ca.

February 27th, 2026

Re: Horizontal Red Tape Reviews

To Whom It May Concern:

On behalf of our members across the fresh fruit and vegetable supply chain, the Canadian Produce Marketing Association is pleased to offer comments to the Red Tape Reduction Office on the Horizontal Red Tape Reviews and appreciate the opportunity to share perspectives from the Canadian fresh produce industry.

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 nearly 900 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

CPMA is also an active participant in multiple federal government stakeholder groups with direct engagement on the regulatory landscape, including Agriculture and Agri-food Canada (AAFC)'s Agile Regulations Table and Horticulture Table, the Canada Border Services Agency (CBSA) Border Commercial Consultative Committees, and the Fresh Produce Alliance-Canadian Food Inspection Agency (CFIA) Technical Working Group.

General comments

The fresh produce industry is a major economic driver across North America. In Canada, the fresh produce supply chain generates \$18.6 billion in GDP and supports 188,000 jobs in rural and urban communities across Canada¹.

CPMA is supportive of the Government of Canada's focus and recent commitments to regulatory modernization and red tape reduction, including the omnibus regulatory package published this fall by CFIA, which substantially increased regulatory flexibility related to fresh produce labelling and advanced the modernization of Canada's fruit and vegetable grade standards. . We encourage the government to

¹ Signal49 Research (formerly Conference Board of Canada), 2025

build on this momentum with further efforts to address ongoing administrative and operational challenges impacting the efficiency and competitiveness of the fresh produce supply chain and the broader agricultural sector.

To help unleash the untapped potential of our sector as a strategic economic driver for Canada, CPMA emphasizes that regulators should consistently undertake dutiful consultation, apply a competitiveness lens and consider cumulative regulatory burden to avoid unintended negative impacts to food production, food security, international trade or capacity to meet government targets and priorities.

Getting products to market faster

Innovative tools and alternative technologies are needed to help the produce sector fight climate change while remaining globally competitive. Greater resources are also required for research into newer alternatives that are safer for humans and the environment than the deregistered crop protection products that urgently need to be replaced. In addition, a regulatory environment that facilitates the North American harmonization of product registration is essential to ensure timely and cost-effective access to safe, effective solutions, and to avoid placing Canadian producers at a competitive disadvantage.

Access to timely approvals, crop protection tools, and regulatory flexibility is essential in a sector that operates under narrow production and market windows. Regulatory disharmonization, particularly where requirements are uniquely Canadian and misaligned with key trading partners, further slows access to innovation. One-size-fits-all regulatory approaches fail to account for the perishable nature and operational complexities of fresh produce and may inadvertently create barriers to market.

Of particular impact to the fresh produce sector, we must note that capacity constraints within the Pest Management Regulatory Agency (PMRA) continue to delay pre-market applications, re-evaluations, and minor use registrations. These delays hinder industry responsiveness to emerging challenges and place Canadian producers at a disadvantage relative to international competitors.

It is also important to recognize the need for cross-departmental collaboration to create the enabling regulatory environment to support innovation. For example, the drone-based application of pesticides has been adopted by producers in other jurisdictions, but its approval in Canada has been a lengthy and complicated process, requiring the involvement of multiple departments and agencies. For Canadian businesses to truly be able to realize the benefits of innovation and remain globally competitive, the federal government must explore opportunities to create regulatory agility and for departments to work together more proactively to achieve this goal.

CPMA recommends that the Government of Canada can support the fresh produce sector in getting products to market faster by:

- Creating an enabling regulatory environment for new products, technologies, and business practices, including acceptance of science-based reviews conducted by other jurisdictions with risk-based approval processes.
- Prioritizing the registration of crop protection products that support domestic food production by applying a food security lens to PMRA decision-making and policies.
- Ensuring PMRA is sufficiently resourced to fulfill core functions, including premarket applications, re-evaluations, and minor use registrations, and implementing clear, predictable standards.

Reducing barriers to business productivity

Cumulative regulatory burden continues to affect productivity across the fresh produce supply chain, including for small- and medium-sized enterprises which are the backbone of our food system. While the sector supports strong federal oversight, inconsistent inspection practices, overlapping audits, and duplicative reporting create uncertainty and divert resources from innovation and operations.

Variability in inspector interpretation contributes to audit fatigue and reduces efficiency. Experience under the *Safe Food for Canadians Regulations* (SFCR) illustrates that outcome-based regulations, when operationalized without sufficient industry engagement, can become prescriptive. This has led to unintended consequences, including substantial resource utilization, with little or no corresponding food safety benefit.

To achieve effective regulatory modernization that reduces barriers to business productivity, the government must apply the right tool to the right issue and consult with industry to help identify the challenge and workable solutions. For example, for trade-enabling areas like food safety, fragmented oversight through a patchwork of provincial and territorial systems could create new barriers to trade; consistency and national standards are essential. We were pleased to see the government listen to industry's strong recommendation to exclude the SFCA and SFCR from the application of the *Free Trade and Labour Mobility in Canada Act and Regulations*. In other areas, such as plastics reporting, where provincial mandates are clearly established and data is already being collected under provincial Extended Producer Responsibility programs, applying additional, duplicative federal plastics registry requirements creates administrative burden and red tape, ultimately adding cost to the end product without tangible benefit. CFIA's recent omnibus regulatory package on labelling and grade standards serves as a clear example of effective regulatory modernization that supports business productivity and was achieved through consultation and collaboration with industry.

CPMA recommends that the Government of Canada can support the fresh produce sector in reducing barriers to business productivity by:

- Implementing a cross-department competitiveness lens, undertake dutiful consultation, and consider cumulative regulatory burden, to avoid unintended negative impacts to food production, food security, and international trade.
- Engaging industry early to understand administrative and financial impacts of regulatory changes and providing flexibility to review regulations where unintended consequences significantly affect business operations.
- Eliminating duplicative reporting requirements, such as under the Federal Plastics Registry.
- Reducing audit burden across programs through standardized inspector protocols and training to ensure fair, risk-based, and predictable enforcement.

Supporting international trade and border efficiency

To ensure the ongoing viability of Canada's food system, 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.

The sector depends on stable, predictable, and science-based frameworks to maintain and expand market access. Mutual recognition of food safety systems, harmonization of phytosanitary requirements, and alignment with international standards are essential to reducing non-tariff trade barriers. Requirements that are not grounded in sound science and risk-based approaches can hinder market access and

undermine competitiveness. Because fresh fruits and vegetables are highly perishable, delays in inspections or approvals can result in product loss, food waste, and increased costs.

CPMA recommends that the Government of Canada can support the fresh produce sector in supporting international trade and border efficiency by:

- Advancing mutual recognition agreements and harmonization of pesticide approvals and residue limits with key trading partners during trade negotiations to avoid technical barriers to trade.
- Recognizing internationally tested science and standards to reduce duplication and lengthy review periods.
- Ensuring phytosanitary and food safety requirements remain science-based and risk-driven.
- Investing in timely and coordinated border inspections supported by modernized digital tools and consistent regulatory interpretation. To the greatest extent possible, the enforcement of regulatory requirements that do not impact customs clearance should be kept separate from customs processes to avoid creating administrative burden and facilitate the smooth flow of goods across the border.
- Coordinating efforts across relevant government departments to work proactively with port authorities and other stakeholders to put in place a formalized process to allow the movement of food and essential goods through Canada's ports of entry in the event of emergency events or disruptions.

Enhancing regulatory service delivery

Timely, predictable, and transparent service delivery is critical to maintaining competitiveness and public trust. While CFIA has demonstrated effective collaboration and modernization efforts, delays in approvals, documentation, and regulatory responses remain a concern in a sector operating under tight commercial timelines.

Digitalization initiatives, including expanded online services, offer substantial benefits but require a whole-of-government approach to ensure interoperability and minimize burden. In addition, recognizing that broadband access remains a barrier, alternative service pathways must remain available for businesses in rural and remote communities across the country that lack digital infrastructure. Where regulatory or policy changes produce unintended consequences, mechanisms should exist for independent examination and pragmatic resolution, ensuring outcomes are met without undermining compliance models.

CPMA recommends that the Government of Canada can support the fresh produce sector through enhancing regulatory service delivery by:

- Ensuring regulatory agencies are adequately resourced to meet service standards.
- Accelerating coordinated digital modernization efforts across government, including interoperability of systems, while maintaining alternative service pathways for businesses with limited digital access.
- Exploring opportunities to leverage consultation with industry stakeholders and fora such as AAFC's Agile Regulations Table to help identify and expedite regulatory changes and initiatives that have broad support and can be operationalized quickly, as demonstrated by the recent CFIA omnibus regulatory package on fresh produce labelling.
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In closing, CPMA emphasizes that agriculture and food production must be a national priority in the government's broader Build Canada economic strategy. Every effort should be made to reduce red tape, remove unnecessary trade barriers and employ a food lens in policy decisions that support the ongoing competitiveness of Canadian producers, while continuing to ensure that Canada maintains high standards for food safety and quality, both domestically and for international trade.

CPMA is appreciative of the opportunity to offer comments and for your consideration of this important matter. We look forward to continued collaboration with the Red Tape Reduction Office and federal partners as part of the government's ongoing work.

Sincerely,

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