



Right Honourable Justin Trudeau
Prime Minister of Canada
House of Commons
Ottawa, ON K1A 0A6

April 7, 2020

Dear Prime Minister,

I am writing on behalf of Canada's fresh fruit and vegetable industry to bring to the attention of your government a number of key priorities for our sector as we continue to navigate the COVID-19 pandemic.

I would like to begin by thanking you for your leadership and for the high level of engagement and collaboration your government has shown in working with industry during these challenging times. It is our sincere hope that this strong working relationship will continue in the months ahead. We are committed to working with government to help find solutions to mitigate the impact of the outbreak on Canadians and to ensure that Canadian families will be able to continue to put our safe, healthy and nutritious products on their tables throughout this crisis and afterwards.

We thank you and your Cabinet in advance for your consideration of the following priorities impacting Canada's fresh fruit and vegetable industry. As you know, in recognition of the positive impact of produce consumption on overall health, the recent release of *Canada's Food Guide* recommends that Canadians fill half their plates with fruits and vegetables. During this time, when the health of Canadians is more important than ever, it is crucial that the government ensure that the availability of fruits and vegetables remains a priority.

Labour

International workers are a critical part of the agri-food workforce in Canada. The fresh fruit and vegetable industry relies upon thousands of workers coming into Canada as part of the Temporary Foreign Worker and Seasonal Agricultural Worker programs in order to plant, cultivate, process, harvest and pack our products. We are very appreciative of your government's flexibility and collaboration with industry in granting exemptions to international travel restrictions for temporary foreign workers.

Our key challenges now relate to the logistics of getting the workers to Canada and navigating the implementation of public health protocols:

- Significant challenges remain in the coordination of transportation for workers coming into Canada now that commercial flights are largely unavailable.
- In addition, federal support is needed to help employers meet housing requirements, as the typical bunkhouse accommodations in many cases cannot meet the social distancing protocols being put in place. Collaboration between municipal, provincial and federal governments is

needed on this front to ensure that employers are able to bring in the workers they need despite a patchwork of regulations.

- Similarly, differences between regional health protocols can create a fragmented approach when regional protocols are more stringent than national protocols, which can cause confusion and increase administrative burden for employers working to ensure that their employees are in compliance with these protocols.
- At the same time, employers also have significant concerns about the costs to be incurred in having to follow a 14-day isolation protocol, during which time workers will not be allowed to work. Federal support is required to mitigate these costs.
- Finally, we have heard from our members that some employers are having difficulty in securing workers due to reduced hours, closures or administrative delays in foreign governments. For example, Mexico is looking to approve British Columbia's health protocols over concerns for workers entering the market, which is delaying paperwork and the movement of workers. We urge your government to work with our international partners in order to facilitate temporary foreign workers' ability to come to Canada.

Border and Transportation Issues

Mitigating financial liability for customs brokers

As noted in our letter to John Ossowski, Canada Border Services Agency President and Paul Rochon, Deputy Minister, Department of Finance, we are supportive of the two requests put forward by the Canadian Society of Customs Brokers (CSCB): first, that the Government of Canada provide a waiver of customs broker liability for duties and taxes now owed on June 30th; and second, that no claims against importer release prior to payment bonds be made for amounts owing for transactions for which payment is due on June 30th. These are measures consistent with the objectives of the recently announced payment deadline extension (4-month payment deferral period for businesses) and will help to ensure that the cash flow benefits of payment deferral flow to business as intended.

Flexibility and harmonization in provincial weight restrictions

The fresh fruit and vegetable industry is active in transporting goods from coast-to-coast-to-coast, and continue to do so during the COVID-19 outbreak in order to provide Canadians with high-quality, healthy food. However, the lack of alignment between provincial spring weight restrictions on highways during the thaw (February to May) increases the costs of moving product interprovincially, as shippers must send out additional trucks to make up for the lost weight.

In light of the challenges industry is currently facing, some provinces have begun waiving or amending their spring weight restrictions, but there are still variances across the country. In order to facilitate the free flow of our essential products from province to province, we urge the federal government to take a leadership role in working with provincial and territorial governments to align spring weight restriction limits on highways.

Proactive planning to ensure the smooth flow of trade

As we move through this COVID-19 pandemic and into recovery, it is imperative that the Government of Canada take a proactive approach to putting measures in place to ensure that the smooth flow of essential products continues, including fresh fruit and vegetables.

In the United States, marine ports are beginning to experience significant backlogs in processing containers carrying essential goods, as containers carrying non-essential goods are piling up with nowhere to go due to business closures. This situation not only delays the movement of essential goods, but also creates a shortage of available containers for future shipments. While Canada's ports are not currently facing these backlogs, we strongly urge your government to plan ahead and enact proactive measures to ensure that this does not occur. The high perishability of fresh produce makes this type of forward thinking particularly important to securing continued access to these essential goods.

Flexibility in Labelling Requirements

The recently released *Safe Food for Canadians Regulations (SFCR)* contain numerous labelling requirements to help consumers differentiate between individual foods and brands to support informed purchasing choices. CPMA was very involved in the consultations leading up to the regulations coming into force and support the efforts of the Canadian Food Inspection Agency (CFIA) in this extensive regulatory modernization.

However, at this time we face a rapidly evolving food supply chain, in which national and international markets are struggling to understand food availability in the short and long term. In this current reality, it is prudent to show flexibility in the areas that do not impact the health and safety of the food supply, to enable the flow of goods, including across international borders. Labelling is one area which is inconsistent between countries and where a temporary relaxation of these requirements could remove potential technical barriers to the trade of food between countries. We are appreciative of the CFIA's recent decisions to ease certain labelling requirements for food products that had been destined for foodservice; this is a positive first step. We urge your government to consider providing increased flexibility in this area and to enact temporary measures to support the availability of food for Canadians as we move through this public health crisis.

Personal Protective Equipment (PPE)

We recognize that the availability of PPE for those on the front lines of the pandemic is of paramount importance and applaud the government's efforts to ensure a continuous supply. It is understood that this is the priority, but there is also a crucial need for materials in the food sector. None of these requirements are for sterile equipment or PPE (i.e. medical grade), but they are necessary to maintain the integrity of the food supply, including preventative control measures ensuring food safety is not compromised. We urge the government to be aware of and consider the needs outlined below, as decisions are made about PPE and material availability.

On-farm

- Cleaning and sanitizing chemicals to maintain good agricultural practices (GAPs)
- Hand-cleaning materials (i.e. soap, paper towels, potable water or hand sanitizer)

- Harvest crew PPE, including gloves and face coverings

Packing Sheds

- Cleaning and sanitizing chemicals to maintain GAPs
- Packing shed employee PPE, including gloves, face coverings, and plastic aprons in some situations (ideally disposable but, if not, easy to clean and sanitize)
- Hand-cleaning materials (i.e. soap, paper towels, potable water or hand sanitizer)

Minimally Processed Facilities

- Cleaning and sanitizing chemicals to maintain good manufacturing practices (GMPs) and standard sanitizing operation procedures (SSOPs)
- In-process chemicals used as disinfectants and/or sanitizers (i.e. chlorine-based, peracetic acid)
- Employee PPE, including gloves, face coverings, and plastic aprons in some situations (ideally disposable but, if not, easy to clean and sanitize)
- Hand-cleaning materials (i.e. soap, paper towels, potable water or hand sanitizer)

Retail

- Cleaning and sanitizing chemicals to maintain good manufacturing practices (GMPs) and standard sanitizing operation procedures (SSOPs)
- Cleaning and sanitizing chemicals to use on consumer touch points (i.e. grocery carts/baskets, checkout belts)
- Employee PPE, including gloves, face coverings, and plastic aprons in some situations (ideally disposable but, if not, easy to clean and sanitize)
- Hand-cleaning materials (i.e. soap, paper towels, potable water or hand sanitizer)

Truck Drivers

- Access to hand-cleaning materials (i.e. soap, paper towels, potable water or hand sanitizer)

Financial Support for Farmers

In addition to the areas noted above, CPMA would also like to take this opportunity to note our support for the request made by the Canadian Horticultural Council (CHC) in their March 31st letter to Minister Bibeau which included: *What we need now from the federal government is two-fold: 1) immediate financial support to mitigate the impact to employers from the required 14-day isolation period, and 2) a commitment to providing meaningful and timely support through AgriStability and AgriInvest.*

On behalf of the fresh fruit and vegetable supply chain, I would like to offer our support to the efforts of you and your cabinet – please do not hesitate to call on our sector if we can be of help or provide information as your work continues.

Thank you in advance for your consideration in these matters.

Sincerely,

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

Ron Lemaire
President
Canadian Produce Marketing Association

Cc: Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Intergovernmental Affairs
Hon. Patty Hajdu, Minister of Health
Hon. Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
Hon. Bill Blair, Minister of Public Safety
Hon. Marc Garneau, Minister of Transport
Hon. Bill Morneau, Minister of Finance
Hon. Carla Qualtrough, Minister of Employment, Workforce Development and Disability Inclusion