



**Red Tape Reduction Office
Treasury Board of Canada Secretariat
90 Elgin Street
Ottawa, ON K1A 0R5**

Submitted via email: regulation-reglementation@tbs-sct.gc.ca

August 22, 2025

FVGC Submission to Treasury Board Secretariat of Canada on Federal Red Tape Reduction Review

Background:

The Fruit and Vegetable Growers of Canada (FVGC) is pleased to submit a written submission to the Treasury Board Secretariat of Canada (TBS) to reduce red-tape for our sector.

Fruit and vegetable growers in Canada operate in one of the most heavily regulated sectors of the economy. While regulation is essential to protect food safety and the natural environment, the cumulative impact of overlapping, inconsistent, and/or duplicative requirements is problematic and diverts significant critical resources away from food production.

FVGC's red-tape reduction recommendations focus on practical fixes that maintain high standards while simultaneously reducing administrative burden: align rules and decisions with science and outcomes; recognize and re-use credible third-party audits; coordinate inspections; set predictable service standards; adopt digital-by-default, "once-only" data re-use; and respect provincial jurisdiction (e.g., wage and housing deductions). FVGC also supports one-stop, pre-filled, and consistent service across programs to minimize day-to-day friction.

FVGC conducted a member survey between July 29 and August 14, 2025, and invited direct submissions from growers across commodities and regions. Members provided practical red-tape fixes grounded in growers' day-to-day experience. Their inputs highlight immediate opportunities for "quick wins" — such as data re-use, consistent standards, recognition of equivalent audits, and coordinated inspections — while also addressing areas where the longer-term modernization of federal regulatory systems is needed.

Introduction:

FVGC has identified five areas that demand attention from the Government of Canada to reduce red tape with seven specific recommendations for action.

1. **Regulation of Crop Protection Products**: Provide access to a range of effective crop protection tools.
2. **Audit Burden & Duplication**: Provide system-wide relief by implementing high-value, practical red tape reductions through recognition and consistency.
3. **Program Access & Service Delivery**: One-stop, consistent service with automatically pre-filled information across AAFC, CFIA, CBSA, and ECCC to cut duplication and daily friction.
4. **Housing Standards & Temporary Foreign Worker (TFW) Oversight Duplication**: Reduce conflicting inspections and timelines while respecting provincial jurisdiction.
5. **Federal Plastics Registry**: Prevent new, duplicative burdens; aligns with existing provincial extended producer responsibility (EPR) schemes and trade realities.

Area 1: Regulation of Crop Protection Products

An urgent need exists for access to an increased range of modern and innovative crop protection tools as many of the products previously relied upon have been cancelled or have lost/reduced effectiveness in the field. The urgency for increased and varied access to new tools is apparent in the unprecedented demand for the Emergency Use Registration Program – a program that was created to address crisis pest outbreaks when existing tools are insufficient.

Unlike major crops (e.g. canola, wheat), fruit and vegetables are grown on a smaller scale, and as a result, there is limited financial interest from pesticide manufacturers to justify the high costs associated with data generation and regulatory approval in Canada. As a result, companies are frequently discouraged from pursuing registrations for these uses from a business standpoint. In addition, Canada's current regulatory framework has not kept pace with innovation, widening the technology gap with the U.S. and other competitors to unsustainable extremes. To address this issue, both the [FPT Working Group on Pesticide Management](#) and [Standing Committee on Agriculture and Agri-Food](#) have recommended that Canada become a more attractive market and encouraged greater alignment with the USA and other jurisdictions to make the registration process more efficient.

FVGC recommends the following changes to improve increased and varied access to new crop protection products.



Recommendation 1: *Develop a framework that globally positions Canada as a first adopter of new technologies by offering competitive review timelines and aligning registration requirements / risk assessments for pest control products with other risk-based jurisdictions such as the US-EPA.*

- Accept risk assessments performed solely by US-EPA (beyond conducting joint reviews).
- Leverage work by other risk-based regulatory agencies within the OECD by recognizing and accepting risk assessments and data reviewed by agencies in other jurisdictions.
- Standardize the use of uncertainty factors with other risk-based jurisdictions.
- Avoid potential misalignment with other OECD jurisdictions by halting proposed regulatory amendments related to cumulative environmental effects and species at risk.

RATIONALE: Canada's pesticide regulatory framework is unable to adapt quickly to new and emerging technologies which in turn places Canadian fruit and vegetable growers at a competitive disadvantage against global trading partners. For example, the Pest Management Regulatory Agency (PMRA) has been working with international partners since 2019 to develop a framework for using remotely piloted aircraft systems (i.e. drones). Yet compared to other countries working to adopt this technology (e.g. USA, Brazil, Australia)¹, the PMRA has adopted a highly conservative approach by restricting their use, even when a crop protection product has been approved for aerial use.

Recommendation 2: *Attract pesticide registrants to Canada by gaining efficiencies and removing impediments to the introduction of newer, safer and more effective minor use pest control products.*

- Removal or reduction of efficacy data or unimpactful toxicology requirements for biopesticide products (e.g. essential oils and other naturally derived products).
- Removal of public consultation periods for User Requested Minor Use Label Expansions that pertain to a New Use Site Category.
- Streamline the registration of biocidal products (sanitizers and disinfectants) by solely requiring efficacy data for plant diseases to be provided.
- Align fee mitigations for cost-recovery with the US-EPA by waiving annual fees for products that are exclusively used on minor use food crops.
- Removal of redundancies from the Minor Use Pesticide Program submission process (D.3.1, D.3.2., and C.6.3.).

RATIONALE: Compared to the US, Canada's pesticide registration framework requires submission of additional information (such as efficacy and value). These types of studies are costly and deters companies from investing given the small size of the Canadian marketplace. For example, the potato industry has been advocating since 2015 for registration of clove oil as a sprout inhibitor. Application of a sprout inhibitor is a requirement of the US Federal Order (USDA-APHIS) to mitigate concerns related to potato wart. Due to the niche role clove oil serves in the potato sector, investment from industry to obtain a full registration for such a product has been challenging. Similarly, products containing Azadirachtin are registered in both the US and the EU but have not been registered in Canada due to additional data requirements imposed by the PMRA. FVGC also

¹ Portillo et al. (2025) Industry (UAPASTF) Response to Pesticide Regulators' "State of the Knowledge" Review of Drone Use for Pesticide Application: Best Practices for Safe and Effective Application of Pesticides. *Drones*, 9(6), 388. <https://doi.org/10.3390/drones9060388>.

notes that initiatives related to the PMRA's transformation and cost-recovery policy are expected to dissuade registrants further by bringing additional costs and red-tape.

Recommendation 3: Streamline Emergency Use Registrations, Re-evaluations and Special Reviews.

- Allow all emergency uses to be authorized for up to three years.
- Allow applicants to pay application fees within 60 days of an emergency use issuance.
- Reduce review timelines by leveraging data and risk assessments from other jurisdictions (see recommendation 1) for situations that are critical and unprecedented.
- Allow pre-consultations with affected stakeholders during special review and re-evaluations.
- Exempt or reduce re-evaluation requirements for biopesticides and low risk products.

RATIONALE: When the PMRA removes a product from the market, the agency is not required to consider food production impacts or find suitable alternatives. In addition, no requirement to engage with grower organizations prior to publication of a proposed decision exists, which subsequently creates additional work for both industry and the PMRA when refinement to a risk assessment is required. Furthermore, products cancelled or withdrawn from the marketplace without replacements has led to significant pressure being placed on the emergency use registration program.

Without timely access to safe and efficacious crop protection tools, the fruit and vegetable sector will not be able to supply plentiful, nutritious, and affordable produce to Canadians, leading to higher food prices, increased reliance on imports, and ultimately greater food insecurity. Moving forward, FVGC encourages the PMRA to apply a “food lens” to its decision-making process by acting on the [Liberal Party of Canada's 2025](#) election platform that committed to amending the mandate of the PMRA to consider food security and the cost of food in all regulatory decisions.

Area 2: Audit Burden & Duplication

Recommendation 4: Reduce audit burden through mutual recognition and standardized enforcement.

- Formally recognize CanadaGAP and other Global Food Safety Initiative (GFSI)-benchmarked audits (e.g., SQF, BRCGS, GLOBALG.A.P., PrimusGFS) for regulatory purposes.
- Establish a national “once inspected, accepted everywhere” audit-recognition framework across CFIA and major buyers.
- Standardize inspector protocols and training to ensure fair, risk-based, and predictable enforcement.

RATIONALE: Growers already complete rigorous third-party CanadaGAP audits that meet or exceed Safe Food for Canadians Regulations (SFCR) and major buyer requirements. Despite this, both regulators and retailers require separate audits covering the same standards, while CFIA licensing duplicates CanadaGAP. grocery chains impose buyer-specific audits, and inconsistent inspector practices — such as requiring hair nets in non-packaging areas or variable washroom partition

rules. Recognizing existing certifications and harmonizing enforcement would eliminate duplication, reduce costs, and improve predictability without compromising food safety.

Area 3: Program Access & Service Delivery

*Recommendation 5: **Modernize program access and service delivery through a single-window digital system and consistent standards.***

- **Single-window portal:** Create one digital entry point for government department programs, with prefilled fields from existing farm data so growers enter information only once.
- **Standardization:** Align inspection protocols, service hours, and program deadlines across regions to ensure predictability.
- **Named contacts:** Provide dedicated points of contact for issue resolution and case management.
- **Eliminate duplication:** Ensure approvals from one agency (e.g. CFIA) are automatically accepted by others (e.g. CBSA) to avoid repeat inspections and subsequent delays.

RATIONALE: Federal agricultural programs and regulatory processes are often complex, slow, and inconsistent. For example, Advance Payments Program (APP) and AgriStability require repetitive data entry and long delays; CFIA offers limited inspection hours and inflexible booking windows; CBSA applies rules differently at different crossings and often repeats checks after CFIA clearance; and Statistics Canada repeatedly requests the same information through multiple surveys. A single, prefilled portal combined with harmonized service standards would cut time, reduce errors, and improve predictability—especially for small and mid-sized farms with limited administrative capacity.

Specific Examples by Department

Agriculture and Agri-Food Canada (AAFC):

- Cost-share and project funding programs with inconsistent timelines and excessive reporting relative to funding value.

Canadian Food Inspection Agency (CFIA):

- Duplicate phytosanitary export documentation requirements.
- Seed program platform requires repeated re-entry of data with no save function.
- CFIA Safe Food licensing duplicates CanadaGAP audits.
- Limited-service hours that do not match farm operations.

Canada Border Services Agency (CBSA)

- Inconsistent export/import rule application across border crossings.
- Cargo control delays due to redundant checks after CFIA clearance.

Environment and Climate Change Canada (ECCC)

- Complex greenhouse gas (GHG) and fertilizer reporting requirements with little farm-level benefit.

Transport Canada

- Excessive paperwork administration for small-quantity Transport of Dangerous Goods (TDG) compliance.

Statistics Canada

- Agricultural census and surveys repeatedly request the same information.

Other Concerns

- Redundant water testing requirements from multiple agencies.
- Conflicting TFW housing standards across levels of government.
- Outdated Plum Pox Virus nursery restrictions despite modern testing.
- Legislative changes introduced as political talking points rather than enforcement improvements.

Area 4: Housing Standards & Temporary Foreign Worker Oversight Duplication

*Recommendation 6: **Streamline housing standards and oversight by creating a coordinated inspection and approval framework.***

- **Single inspection framework:** Replace overlapping inspections (federal, provincial, municipal) with a single coordinated inspection and approval process that all authorities accept.
- **Respect jurisdiction:** Ensure federal program rules on wage and housing deductions respect provincial standards.
- **Digitize processes:** Create one centralized online portal where growers submit housing information once, and all levels of government can access and approve it, instead of requiring duplicate paperwork.

RATIONALE: Multiple inspections for TFW housing are carried out by federal and provincial agencies, local public health units, and municipal fire departments—each with its own standards, timelines, and required documentation.

For example:

- **CFIA vs. Public Health Standards:** Provincial public health requires potable water testing monthly, while federal inspectors often request duplicate tests using different labs, leading to redundant costs.
- **Federal vs. Municipal Standards:** Municipal fire departments apply varying square footage and egress requirements that do not align with federal housing guidelines, forcing growers to renovate facilities multiple times.
- **Inspection Timelines:** Provincial inspections are often conducted in early spring, while federal inspections may occur weeks later, thereby holding up the arrival of workers. This can delay planting by several weeks, with cascading production and financial impacts.
- **Wage & Housing Deductions:** Provinces like Quebec allow higher maximum weekly deductions for worker housing than federal rules, creating inter-provincial inequities and compliance uncertainty.

Area 5: Federal Plastics Registry

Recommendation 7: Align Phase 2 reporting with existing systems and design requirements that reflect the realities of agricultural plastics.

- **Eliminate duplication:** Harmonize federal reporting requirements with provincial extended producer responsibility (EPR) programs that already cover numerous agricultural plastics.
- **Shift reporting upstream:** Require suppliers and manufacturers, not individual farms, to report quantities of agricultural plastics introduced into the supply chain.
- **Account for contamination:** Recognize that most on-farm plastics cannot be reused due to phytosanitary restrictions and food safety standards. Once used, these plastic materials are typically contaminated with fertilizers, crop protection products, soil, and plant debris, making them ineligible for recycling streams.
- **Design practical reporting categories:** Ensure agricultural plastics are tracked in a manner that acknowledges their unique end-use, contamination risks, and the lack of recycling infrastructure.

RATIONALE:

Fruit and vegetable growers are long-standing stewards of the natural environment, committed to sustainability and the responsible management of Canada's natural landscapes; however, on-farm use of plastics present unique challenges. Unlike consumer packaging, on-farm materials are integrated directly into food production systems and quickly become contaminated with soil, fertilizers, crop protection products, and plant debris. Phytosanitary regulations and food safety protocols prevent reuse, while recycling facilities capable of handling these materials are limited or unavailable.

In addition, many provincial extended producer responsibility (EPR) programs already require reporting of on-farm plastics. Adding new or separate federal reporting requirements would duplicate these existing provincial systems and force farms to comply with overlapping rules for the same materials. Requiring farms to track and report plastics they neither manufacture nor control is impractical, as growers have no alternative materials available for critical production uses. The use of plastic in these cases is not a discretionary choice but a necessity, for example, mulch films, irrigation tubing, and greenhouse covers have no viable non-plastic substitutes. By shifting responsibility upstream to plastic producers and aligning federal and provincial programs, the federal government can obtain accurate data, avoid duplication, and ensure requirements remain manageable for growers.

Conclusion

A regulatory system that focuses on and promotes science-based alignment, mutual recognition, data re-use, and coordinated inspections will eliminate duplication and delay while protecting the outcomes Canadians expect -- food safety, environmental stewardship, and a reliable food supply. By streamlining the existing regulatory regime, the federal government can support growers to produce safe, affordable fruits and vegetables, while enhancing domestic food security and strengthening Canada's competitiveness in increasingly complex and competitive global markets.

In sum, FVGC welcomes the Government of Canada's consideration of this submission and looks forward to additional opportunities to discuss and collaborate on regulatory modernization that can best support Canadian food production. Our members are committed to building a more efficient

and responsive regulatory system and stand ready to share practical, grower-sourced solutions that reduce unnecessary burden while maintaining Canada's high standards.

Contact Information:

Erik Nielsen, Ph.D.

Director of Policy, Research and Public Affairs
Fruit and Vegetable Growers of Canada
2200 Prince of Wales Drive, Suite 102
Ottawa, ON K2E 6Z9
enielsen@fvgc.ca

The Fruit and Vegetable Growers of Canada (FVGC) represents growers across the country involved in the production of over 120 different types of crops on over 14,000 farms, with a farm gate value of approximately \$8 billion. FVGC is an Ottawa-based voluntary, not-for-profit, national association, and, since 1922, has advocated on important issues that impact Canada's fresh produce sector, promoting healthy, safe, and sustainable food, ensuring the continued success and growth of the industry.

