Chair, Honourable Members, thank you for the invitation.

My name is Chris Duyvelshoff, and I am representing the Fruit and Vegetable Growers of Canada. I am pleased to appear today because the Committee's study focuses on the heart of our work: ensuring that science-based regulation supports reliable, accessible, Canadian-grown food. Your attention to CFIA and PMRA reform is an opportunity to align strong protections with practical delivery on the farm.

FVGC supports strong, evidence-based regulation. Canada can uphold high standards while improving predictability and minimizing impacts to food production by using a food lens to make policy decisions.

Right now, decisions at the PMRA and CFIA are not viewed through a food lens. This results in two major problems for growers. First, crops don't wait and neither do pests. Farmers need predictable, science-based approvals so they're not left without crop protection tools. Second, farms already meet strict CanadaGAP food safety audits yet face repeated checks for the same rules.

When Canadian regulators make decisions, they already assess human health and environmental evidence. A food lens adds a complementary perspective: what does this decision mean for food security and a stable domestic supply?

Using a food lens as a guide, FVGC proposes the following five practical changes at PMRA and CFIA that support producers and enhance food security.

First, we recommend that the PMRA utilize existing reviews from comparable regulatory agencies where scientific standards and the evidence base are equivalent. When peer regulators such as the U.S. Environmental Protection Agency and other OECD agencies have completed comparable risk assessments, Health Canada should recognize those assessments and the underlying data, while addressing Canadian-specific considerations as needed.

Second, we recommend that PMRA develop regulatory pathways for new technologies such as drones with the U.S. Environmental Protection Agency and other global regulatory partners.

The use of aerial drones provides the opportunity to protect crops where ground-based application systems cannot be used. For example, after a flooding event, a field may be too wet to use traditional tractors and sprayers. American growers have had access to this

technology for several years. Despite the PMRA working on a regulatory framework for drone technology since 2019, there remains no clear pathway for approval in Canada.

Third, we recommend that the Minor Use Pesticide Program be properly resourced for its mandate and align with the U.S. by waiving annual fees for products used solely on minor-use food crops. Additionally, for submissions that make small, common changes, such as adding a crop or pest in a greenhouse, PMRA should skip formal consultation.

Fourth, we recommend that Emergency Use Registrations, for unmanageable pest outbreaks, should be authorized for up to three years, with accelerated timelines for critical cases. To minimize the need for emergency uses, during special reviews and re-evaluations, pre-consultations with affected stakeholders should be permitted so that solutions can be identified early.

Finally, we recommend that the CFIA eliminate duplication and enhance standardization to reduce the audit burden. For example, CFIA should formally recognize CanadaGAP and other certification programs recognized by the Global Food Safety Initiative to eliminate duplicative regulatory requirements. Additionally, inspector protocols and training should be standardized nationally so enforcement is fair, risk-based, and predictable across Canada. Moreover, phytosanitary export documentation should not be duplicated when required information is already available, and approvals from one agency, such as CFIA, should be respected by others, such as CBSA, to avoid repeat inspections of the same elements.

In closing, Canadians expect food to be plentiful and safe. By making decisions through a food lens, the government can deliver both.

Thank you for your time.