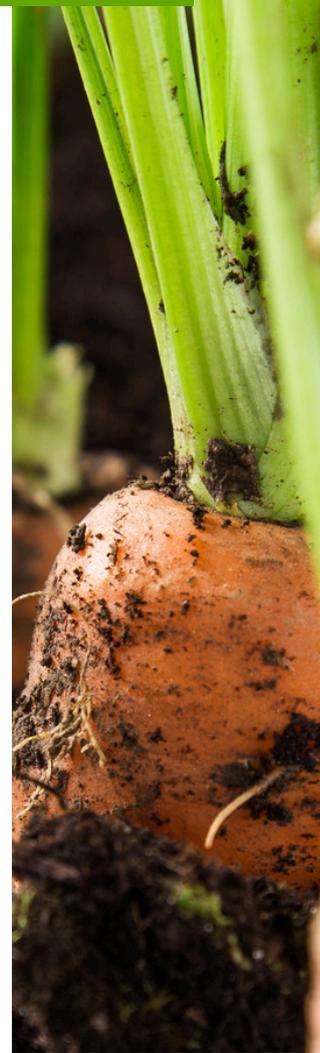


POLICIES FOR FOOD SECURITY

What Canadian Growers Need,
to Feed Canadians



FRUIT & VEGETABLE
GROWERS
OF CANADA

PRODUCTEURS
DE FRUITS ET LÉGUMES
DU CANADA



Visit our website to learn more
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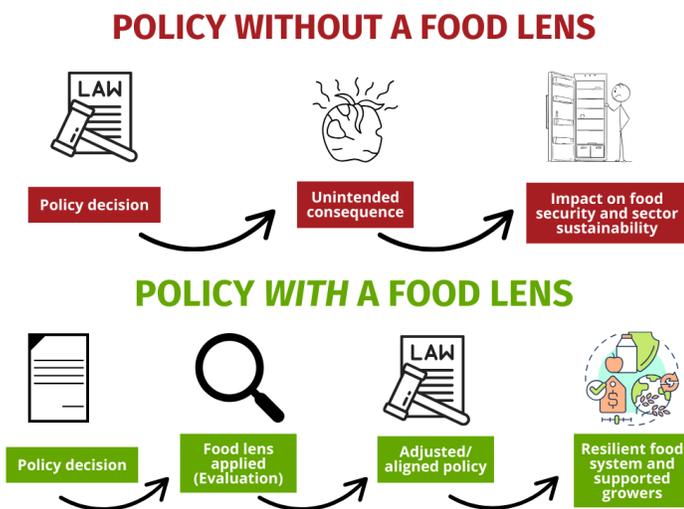


APPLYING A FOOD LENS TO POLICYMAKING

THE ISSUE

In today's complex policy and political landscape, marked by global trade disruptions, extreme weather and rising production costs, government policies on issues like taxation, labour, climate action, or infrastructure can directly or indirectly impact Canadian agriculture.

At a time when one in five Canadian households are struggling with food security and food bank visits are at an all-time high, integrating food security into decision-making, will better balance Canada's environmental goals, economic growth, and food system resilience, ensuring that policies support, rather than undermine, farmers and the broader agri-food sector.



OUR RECOMMENDATION:

The Government of Canada should apply a food lens to all key policies to ensure food security, sector sustainability, and public health. A yearly report on its application should be tabled before the House of Commons Standing Committee on Agriculture and Agri-Food to enhance transparency, accountability, and informed decision-making on agriculture and food-related issues nationwide.

WHY THIS MATTERS

Without a food lens, well-intended policies can exacerbate food insecurity, limit farm profitability, or hinder innovation. A food lens would ensure that cost-benefit analysis of policy initiatives examined their impact on agricultural production and that any trade-offs were transparent.

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FIXING A FRAYED SAFETY NET

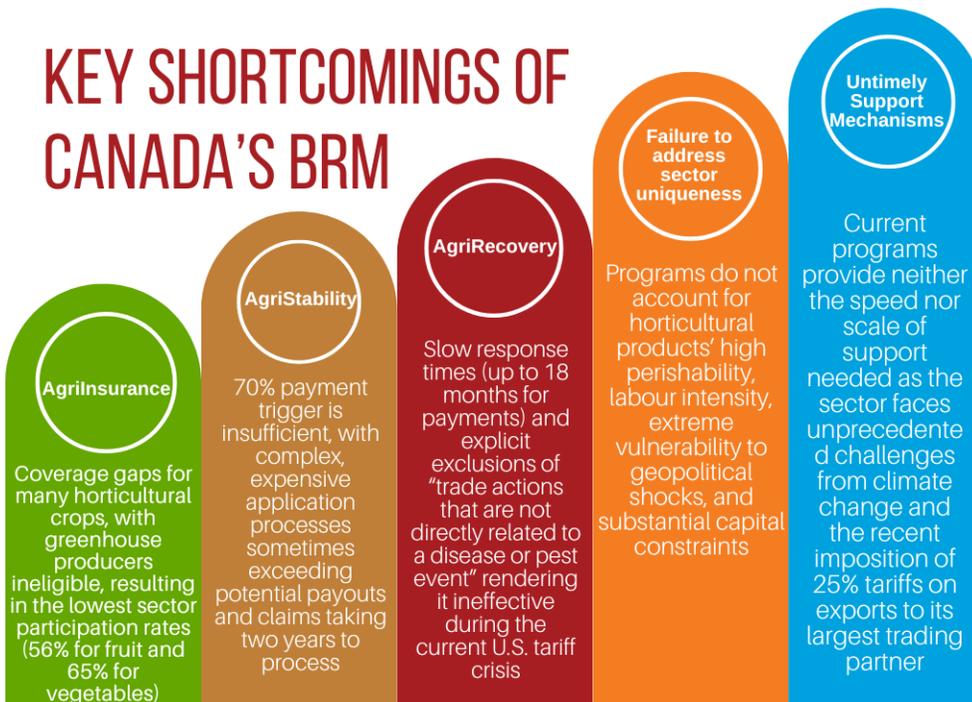
THE ISSUE

Canada’s five Business Risk Management (BRM) programs were designed to provide a safety net for farmers facing income losses from factors beyond their control. However, these programs have long fallen short for the fruit and vegetable sector. They are poorly suited to the realities of horticultural production—such as high perishability, rising input costs, labour volatility, and shifting market dynamics. The current suite is slow, inconsistent, and not responsive to risks like extreme weather, sudden cost spikes, or disruptions in domestic and international trade. While some programs may offer limited support in crisis situations, none are designed to provide the timely, targeted, and reliable coverage this sector needs.

At a time when one in five Canadian households are struggling with food security and food bank visits are at an all-time high, insufficient BRM programs lead to less food security and a higher cost of food for Canadians.

The current crisis is an opportunity to modernize our thinking and move from a BRM paradigm to one of Business Risk Management and Mitigation (BRMM).

KEY SHORTCOMINGS OF CANADA’S BRM



WHY THIS MATTERS

The need for immediate action cannot be overstated. While BRM programs are slated for review in 2028, their demonstrated unsuitability calls for an accelerated timeline, including immediate steps to support Canada’s fruit and vegetable growers navigate the market uncertainty caused by the imposition of US tariffs.

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OUR RECOMMENDATIONS

To safeguard Canada's domestic fruit and vegetable production and ensure long-term sector resilience, FVGC recommends the following actions:

1. **Provide immediate, short-term support**

Implement direct support measures for growers facing the immediate impacts of trade disruptions, particularly those related to threatened US tariffs.

2. **Accelerate the review of BRM programs**

Advance the timeline for the review of Business Risk Management programs to better reflect the urgent needs of the sector, and ensure they are responsive to extreme weather, geopolitical volatility, and plant health emergencies.

3. **Modernize the BRM framework**

Transition from a Business Risk Management (BRM) paradigm to a Business Risk Management and Mitigation (BRMM) approach by incorporating:

- Enhanced funding for pest management programs
- Weather-indexed insurance tools
- Support for proactive on-farm risk reduction infrastructure
- Incentives for market diversification to reduce export dependency

4. **Expand AgriInsurance**

Extend AgriInsurance coverage to include greenhouse crops, ensuring equitable risk protection across all production systems in the sector.

5. **Introduce compensation for quarantine-related destruction**

Establish a mechanism to compensate growers who are required to destroy crops or plant materials under government quarantine orders related to pests or disease.

6. **Restore AgriStability program parameters**

Reinstate the AgriStability trigger to 85% and increase the compensation rate to 85%, to better reflect the realities of growing fruits and vegetables in today's market and climate.

7. **Explore revenue-based insurance products**

Work with Agriculture and Agri-Food Canada (AAFC) to develop and pilot revenue-based insurance models tailored to the specific risk profiles of horticulture.

8. **Invest in plant health and biosecurity**

Support the development and implementation of national and on-farm plant health strategies, including integrated pest management tools, preventative biosecurity measures, and physical barriers like insect screens.

PROVIDING ACCESS TO A RANGE OF EFFECTIVE CROP PROTECTION TOOLS

Fruit and vegetable growers require effective crop protection tools to tackle pest pressures from the environment (weeds, insects, and diseases). Without such tools, our sector would not be able to supply plentiful, nutritious, and affordable produce to Canadians, which in turn would lead to higher food prices, increased reliance on imports, and ultimately greater food insecurity.

THE ISSUE

There is an urgent need for access to an increased range of modern and innovative crop protection tools. Many of the products once relied upon have been cancelled or have lost / reduced effectiveness in the field. Unlike major commodities (e.g. canola, wheat), fruit and vegetables are grown on a much smaller scale, and as a result, there is limited financial interest from pesticide manufacturers to bring their products to Canada. Given this economic reality, growers have relied heavily upon government research from Agriculture Agri-Food's Pest Management Centre (PMC) to fill this void.



Despite its critical importance to the fruit and vegetable sector, the PMC's budget has been frozen for more than a decade. Inflationary pressures have dramatically reduced its research capacity over the last 10 years, which means fewer crop protection tools are being delivered to fruit and vegetable growers. As pest management becomes increasingly complex from new pest pressures, economic impacts from the pandemic (e.g. inflation) and global trade instabilities, government must ensure the PMC and Pest Management Regulatory Agency (PMRA) are equipped and empowered to be engaged partners in developing practical solutions for growers.



FUNDING TO THE PMC

OUR ASK

Invest immediately in the Minor Use Pesticide Program to restore its capacity and output to levels observed under Growing Forward between 2008-2013 (~\$7.2 M annual budget increase).

WHY THIS MATTERS?

Without timely access to crop protection tools, the quality, value, and yield of our crops will fall, leading to more imports and weakened food security.

FAQ

Q: Why are pesticide manufacturers reluctant to register their products in Canada on fruits and vegetables?

A: Compared to the US, the Canadian pesticide market is significantly smaller representing only 3.7% of the global market. Additionally, it is costly to develop supporting data and obtain registration with PMRA in Canada. Fruit and vegetable crops are low acreage, and as a result, companies do not want to invest time and resources to register their products in Canada if the return on investment is lacking.

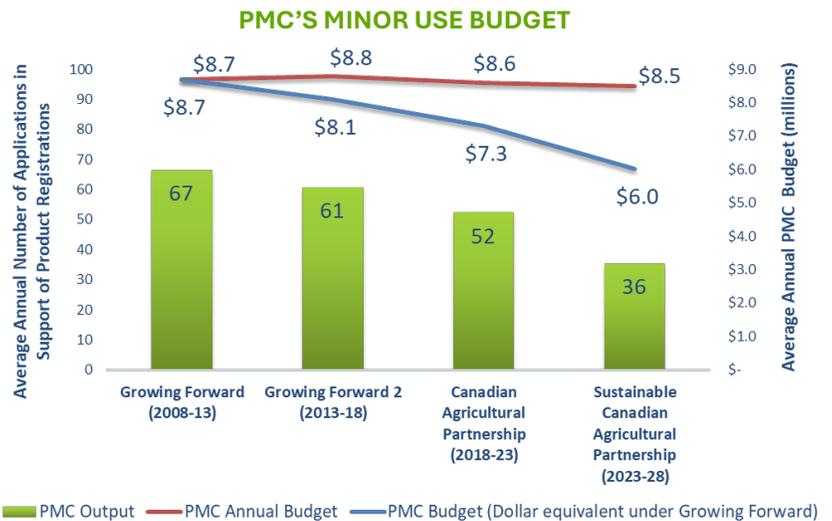
Q: How does the Minor Use Pesticide Program (MUPP) address the needs of growers.

A: The priorities of the MUPP are directly determined by stakeholder input including growers and industry experts. The research work required for PMRA registration including product efficacy, residue and crop safety is then developed by the PMC and submitted to PMRA. The MUPP therefore provides growers access to critically important crop protection tools that would not been available otherwise.

Q: How does the PMC's Minor Use Pesticide Program (MUPP) benefit Canadians?

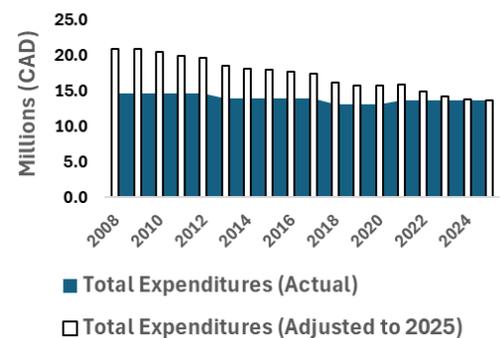
A: The MUPP has been very effective over more than 20 years in generating data that has enabled the registration of pesticide products for minor use crops, which in turn bring many benefits to Canadians.

- ❖ **Environment:** Provides farmers with newer pest management solutions that replace older products and lower our environmental footprint. For example, the MUPP's work on grape berry moth supported the replacement of organophosphate insecticides in vineyards, which while effective, had higher negative effects.
- ❖ **Food Security:** Introduction of new and more efficacious pest control products can reduce costs for growers while increasing production output, making fresh produce more affordable to Canadians.



MUPP Budget Over Time

Includes PMC and PMRA





- ❖ **Economy:** Enables growers to remain competitive on a domestic and international level as growers abroad often have greater access to novel and more efficacious pest control products. In addition to bringing new technologies to Canada, the MUPP has enabled the simultaneous registration of certain pest control products through collaborative research projects with the US.
- ❖ **Risk Management:** Growers continue to face challenges in the field as a result of emerging pests, an unpredictable climate, resistance management, unfavorable PMRA re-evaluation and special review decisions, and a growing technological gap. The MUPP brings resilience to our sector by equipping growers with safe and efficacious tools that help prevent crop losses. For instance, a 2016 study by AAFC estimates that between 2003-2016 the minor use pesticide program contributed to the prevention of crop losses in the range of \$653-\$998 million annually (~\$9B total). The MUPP also returned \$42 of net benefits to society for every \$1 invested.

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GREENHOUSE INVESTMENT ROADMAP

THE ISSUE

Canadian food security is tied to a strong Canadian economy. Remaining competitive in the North American market remains critical to safeguarding Canada's domestic fresh fruit and vegetable production and growing its greenhouse capacity.

Growers invest millions into their growing structures, energy and water infrastructure, digital agriculture, and human resources which are shaping Canada into a global greenhouse leader. As the government prioritizes investments, enabling policies, programs, and infrastructure, it must reflect this scale of private capital investment and resulting economic contribution of greenhouse businesses.

WHY THIS MATTERS

Greenhouse operations are critical to extending Canada's growing season, and enabling reliable access to fresh produce year-round, while reducing import dependency, and expanding the range of Canadian-grown fresh produce options for consumers. Supporting legislation, regulatory amendments and enabling tax policy within a food lens are critical to improving food security and affordability, spurring innovation, and driving greenhouse investment that remains in Canada.

OUR RECOMMENDATIONS

The Greenhouse Investment Roadmap outlines five key areas for strategic investment to support the sector's demonstrated strengths and opportunities ahead:

1. **Support** expansion of production capacity and crop diversification
2. **Incentivize** sustainable, year-round domestic food production and trade
3. **Address** investment barriers by reducing cumulative red tape
4. **Recognize** the importance of housing, healthcare, and rural transit
5. **Increase** funding to advance sector-prioritized research



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SECURING TRADE COMPETITIVENESS FOR CANADA'S FRUIT AND VEGETABLE SECTOR

THE ISSUE

Canada's fruit and vegetable sector is uniquely exposed to trade disruptions. Perishable goods can't sit indefinitely in warehouses or be rerouted through alternative markets. When delays or tariffs occur, crops spoil and markets are lost—sometimes permanently. At a time when one in five Canadian households are struggling with food security and food bank visits are at an all-time high, Canada's fruit and vegetable sector needs a competitive trade market to ensure they can continue to provide fruit and vegetables to Canadians.

Trade agreements and regulatory regimes often overlook the unique needs of horticulture. At the same time, Canadian growers must compete against imports produced under different regulatory, labour, and environmental conditions—often at lower cost—while bearing rising domestic compliance costs.

Without targeted policy support to improve competitiveness and safeguard market access, growers risk losing both export opportunities and domestic shelf space.

WHY THIS MATTERS

Canadian growers compete globally but operate locally. They produce safe, high-quality food, support rural economies, and contribute billions to the national economy. But without strong trade protections and competitiveness policies, we risk ceding more market share to imports—reducing Canada's ability to feed itself, limiting rural economic opportunity, and threatening the long-term viability of our domestic food system.

OUR RECOMMENDATION

To protect competitiveness and ensure long-term food security, the federal government must act in three key areas:

1. Ensure Horticulture Is Reflected in Trade Policy
2. Improve Monitoring and Safeguards for Import Surges
3. Offset Rising Domestic Costs Through Targeted Competitiveness Programs



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ENSURING LABOUR STABILITY FOR CANADA'S FRESH PRODUCE SECTOR

THE ISSUE

Horticulture is the most labour-intensive sector in agriculture. Fruit and vegetable production depends on manual work at every stage—from planting and pruning to hand-harvesting, grading, and packing. Many crops require repeated harvests within tight timeframes, and delicate produce can't be picked by machine without damage. In Canada, fruit and vegetable growers face persistent labour challenges, with a peak-season vacancy rate of 12% in 2022, amounting to approximately 6,300 unfilled jobs and an estimated \$260 million in lost sales.

When growers can't access sufficient labour, they face financial strain, reduced crop yields, and disrupted supply chains. These pressures not only hurt growers' businesses but also reduce the amount of fresh, Canadian-grown produce available to consumers, leading to higher prices and fewer choices at the grocery store.

WHY THIS MATTERS

Growers cannot produce fresh fruits and vegetables without reliable access to workers. Streamlining processes and protecting proven programs like SAWP will help maintain timely access to labour—while protecting both workers and employers. SAWP is uniquely structured around seasonality, bilateral agreements, and government oversight, offering predictability for employers and strong safeguards for workers. The result: more Canadian-grown food on store shelves, stronger farm businesses, and more stable food prices for Canadian families.

OUR RECOMMENDATIONS

1. **Preserve and Strengthen the Seasonal Agricultural Worker Program (SAWP)**
2. **Recalibrate Oversight and Enforcement Practices**



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THE ISSUE

There is an urgent need for access to an increased range of modern and innovative crop protection tools. Many of the products once relied upon have been cancelled or have lost/reduced effectiveness in the field. This urgency 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.

Health Canada’s Pest Management Regulatory Agency (PMRA) is the federal body responsible for science-based regulation of crop protection tools in Canada. At the present time, the PMRA’s decision-making framework does not take into consideration how its policies will impact food security or the cost of food.

FVGC supports the [Liberal platform’s commitment to amend the mandate of the PMRA](#) to ensure they consider food security and the cost of food in all their regulatory decisions. Without this change, the PMRA’s decision-making and policy frameworks will continue to enable the following:

CURRENT STATE OF PMRA	IMPACTS
Removal of products from the marketplace without suitable alternatives being identified.	Growers continue to lose access to tools that are essential for growing their crops, which in turn increases the cost of production and reduces competitiveness.
Product manufacturers determine which crops appear on product labels in Canada.	Safe and efficacious products can not be registered in Canada on fruit and vegetables despite their importance to food security and affordability.
Reliance on overly conservative risk assessments.	Regulatory decisions that significantly impact our sector are not fully based on real-world data. Instead, the PMRA relies on overly conservative statistical models, as there is no mechanism to use a risk-benefit approach when data gaps are presented.
An overcomplicated regulatory landscape that is not aligned with international or common standards.	Private sector does not want to invest in Canada, which in turn creates a widening technology gap between Canadian growers and their US counterparts. This ultimately impacts competitiveness of the sector.

OUR ASK

Apply a food lens to PMRA decision-making to prioritize registrations that support domestic food security. The PMRA must also allocate and prioritize resources towards activities that directly support the timely delivery of new crop protection tools: (1) New registrations; (2) Real-world data; and (3) Re-evaluations and special reviews.

WHY THIS MATTERS

Without timely access to crop protection tools, the quality, value and yield of our crops will fall, leading to more imports and weakened food security.

FAQ

Q: How is PMRA's decision-making negatively impacting fruit and vegetable growers?

A: At the present time, the PMRA mandate does not allow for food security and affordability to be meaningfully considered when making regulatory decisions, which in turn has enabled the following:

- ❖ **Removal of Products from the Marketplace without Suitable Alternatives:** When the PMRA decides to remove products from the market, the agency is not required to consider food production impacts or find suitable alternatives. There is also no requirement to engage with grower organizations prior to publication of a proposed decision. As a result, growers are left to fend for themselves when products are cancelled or withdrawn from the marketplace.
- ❖ **Product Manufacturers Determine Which Crops Appear on Product Labels in Canada:** Presently, product manufacturers determine which crops appear on a product label following PMRA approval. Consequently, major crops with the greatest potential for financial return are first to be registered for a specific product. Since fruit and vegetable crops are lower acreage crops with lower potential return on investment for manufacturers, they are typically the last to appear on new product labels. Furthermore, they are the first to be removed if PMRA reviews determine a product's use must be curtailed. As a result, safe and efficacious products that are critical for food security can not be registered in Canada or are lost more regularly during PMRA reviews.
- ❖ **Reliance on Overly Conservative Risk Assessments:** Historically, there has been poor availability and/or quality of real-world data on pesticide uses and their residues in Canadian waterbodies. This limitation has led to overly conservative decisions being made during pre- and post-market reviews, which in turn has prevented certain crop uses from being registered or products being pulled from the market. To overcome this challenge, the PMRA has been working to develop a water monitoring program and framework for grower use information. Unfortunately, funding for these initiatives is set to expire in Spring 2026 and the PMRA has not committed to integrating them into their day-to-day operations, despite their importance to food security.
- ❖ **An Overcomplicated Regulatory Landscape that is not Aligned with International or Common Standards:** 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 often deter companies given how small the Canadian marketplace is. Furthermore, initiatives related to the PMRA's transformation and cost-recovery policy are expected to dissuade registrants further by bringing additional costs and red-tape.

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THE ISSUE

Timely access to an increased range of modern and innovative crop protection tools is urgent, as many of the products once relied upon have been cancelled, withdrawn, or have lost/reduced effectiveness in the field.

Unfortunately, Canada’s pesticide regulatory framework is unable to adapt quickly to new and emerging technologies, placing Canadian fruit and vegetable growers at a competitive disadvantage against global trading partners, in particular the USA. This was highlighted by a recent report by [Agriculture Agri-Food Canada \(AAFC\)](#) which found evidence that “the technology gap between Canada and the United States may be growing wider due to declines in minor use registrations and new regulatory processes”.

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 risk-based jurisdictions to make the registration process more efficient.

REGULATORY BARRIERS ARE LIMITING GROWER ACCESS TO EFFICACIOUS AND SCIENCE BASED TOOLS

 DRONES	 RNAi	 NEW ACTIVE INGREDIENTS	 FOOD / PLANT EXTRACTS
<p>USA: Allows growers to apply pesticides using drones if the product is already approved for aerial application.</p>	<p>USA: Has approved multiple RNAi technologies (very safe) for use on potato and to protect honey bees.</p>	<p>USA: Will assess a product’s risk to human health and environment.</p>	<p>USA: Exempts certain foods (e.g. garlic) and plant extracts (e.g. clove oil) from onerous data requirements.</p>
<p>CAN: Despite PMRA working on a regulatory framework since 2019, there remains no clear pathway for approval in Canada.</p>	<p>CAN: The PMRA will assesses each product on a case-by-case basis as no formal framework exists. Despite attempts, to date, no product has been approved.</p>	<p>CAN: The PMRA will assess a product’s risk to human health and environment, but will require additional information such as efficacy and value.</p>	<p>CAN: Since 2018, the PMRA has consulted on possibility of exempting some foods from regulatory overview, but is unwilling to consider plant extracts or essences.</p>

OUR ASK

PMRA: Pest Management Regulatory Agency

Develop a framework that globally positions Canada as a rapid adopter of new technologies by offering competitive review timelines and aligning registration requirements / risk assessments for new pest control products with other risk-based jurisdictions (e.g. USA, Australia, New Zealand, etc).

WHY THIS MATTERS?

Without timely access to crop protection tools, the quality, value, and yield of our crops will fall, leading to more imports and weakened food security.



FAQ

Q: Why are fruit and vegetable growers disproportionately impacted by regulations and policies at the PMRA that hinder innovation?

Unlike major commodities such as canola or wheat, fruit and vegetables are grown on a much smaller scale (commonly referred to as minor use crops), and as a result, the potential return on investment for pesticide companies is often insufficient to justify the high costs associated with bringing a product to market in Canada.

Q: What is driving the technology gap between Canada and the USA?

A: There are several factors contributing to the widening technology gap:

- ❖ **Delays in registering new active ingredients:** Registration timelines are commonly not meeting performance standards set by the PMRA, taking 3 to 4 years to complete instead of the standard of two years.
- ❖ **Additional data requirements:** PMRA requires submission of additional information (such as efficacy and value). These types of studies are costly and often deter companies given how small the Canadian marketplace is for crop protection products.
- ❖ **Lack of new regulatory processes:** Without having a formalized process for approving novel technologies, companies are unable to predict data requirements and timelines. This uncertainty deters companies from investing as products are assessed on a case-by-case basis (e.g. RNAi, drones).
- ❖ **Prolonged underfunding to government programs that support registration and adoption of new tools:** AAFC's Pest Management Centre (PMC) plays a critical role in delivering new technologies to our sector. Sadly, PMC's budget has been frozen for more than a decade and is now producing about half the output from 10 years ago.

Q: How does on-farm adoption of new technologies benefit Canadians?

A: New technologies provide many benefits to Canadians:

- ❖ **Environment:** Provides growers with newer pest management solutions that replace older products and lower our environmental footprint. Introduction of new and diverse technologies can help prolong a product's efficacy by slowing down pesticide resistance.
- ❖ **Food Security:** Introduction of new and more efficacious pest control products can reduce costs for growers while increasing production output, making fresh produce more affordable to Canadians.
- ❖ **Economy:** Enables growers to remain competitive on a domestic and international level as growers abroad often have greater access to novel and more efficacious pest control products

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