

September 29, 2022

Ms. Tina Green  
Assistant Secretary, Regulatory Affairs  
Treasury Board of Canada Secretariat

Sent via email: [regulation-reglementation@tbs-sct.gc.ca](mailto:regulation-reglementation@tbs-sct.gc.ca)

**Re: Competitiveness Assessment Tool Consultation**

Dear Ms. Green,

The Canadian Canola Growers Association (CCGA) is pleased to participate in the Treasury Board of Canada Secretariat's consultation on the proposed Competitiveness Assessment Tool (CAT). CCGA represents 43,000 canola farmers on national and international issues, policies, and programs that impact farm profitability and is **the largest administrator of Agriculture and Agri-Food Canada's Advance Payments Program (APP)**.

Developed in Canada, canola is a hallmark of Canadian science and innovation and has a strong record of contributing to Canada's economy. Canola is Canada's most widely seeded crop and has the largest farm cash receipts of any agricultural commodity, **earning farmers over \$12 billion in 2021**. Annually the canola industry contributes **\$29.9 billion to the economy**, provides for **207,000 Canadian jobs**, and **exports** were valued at **\$13.7 billion in 2021**. **Canola oil is also a healthy choice for consumers due to being low in saturated fat and contains zero trans fat and cholesterol**. The industry is focused on the future and has set **sustainability goals** to improve energy and land efficiency, sequester more carbon, improve soil and water health, and protect biodiversity.

We are pleased to see the government undertaking a competitiveness assessment of our regulatory system. Now more than ever Canada should be looking to unlock and unleash our agriculture and agri-food sector to feed and fuel the world. Canola is well positioned for sustainable intensification of production but to realize our sectors full potential we need a regulatory environment that incentivizes innovation on farm and ensures that farmers have access to the key inputs and tools they need to be both economically and environmentally sustainable.

CCGA would offer the following suggestion as the government finalizes the CAT:

- Ensure that the CAT clearly addresses duplication and/or redundancy when new regulations are being considered
- Include specific reference that regulations be evidence- and science-based
- More clearly address and consider costs of compliance associated with new regulations and potential financial and administrative burden on industry
- Take into consideration whether regulations have been recently reviewed or updated through departmental consultations, the *Canada Gazette* process, or the Annual Regulatory Modernization Bill
- Use other jurisdictions and top trading partners as a point reference to assess Canada's regulatory competitiveness globally and consider regulatory alignment where it makes sense to do so. .
- Ensure appropriate training and continuous education on the CAT for members of the federal public service

- Commit to an initial (after the first year of implementation) and regular reviews and assessments of the CAT to determine its effectiveness and potential areas of strengthening or improvement

We strongly support the federal government developing and implementing competitiveness tools such as the CAT. Widespread understanding and adoption of the CAT across departments and agencies will be critical to ensuring the intended outcomes are met.

CCGA would welcome the opportunity to meet with you or the appropriate person at the Treasury Board Secretariat to discuss specific agriculture recommendations and would be happy to facilitate a small group of farm and value chain organizations to participate in such a meeting.

Thank you for the opportunity to participate in this consultation.

Sincerely,

[Original Signed By]

Dave Carey  
Vice-President, Government & Industry Relations  
Canadian Canola Growers Association

CC: Janelle Whitley, Senior Manager, Trade and Marketing Policy, CCGA