



Canadian Pork Council
Conseil canadien du porc

Recommendations on Draft Guidelines for Greenwashing under Bill C-59

By the Canadian Pork Council

The Canadian Pork Council (CPC), representing over 7,000 pork producers nationwide, welcomes the government's initiative to address greenwashing through amendments to the Competition Act (Bill C-59). While we support improving transparency and accountability for environmental claims, the draft guidelines must also be fair, achievable, and support the legitimate realities of agricultural producers.

This brief outlines key recommendations to ensure that the guidelines effectively balance consumer protection, fair competition, and the realities of sustainable pork production.

Key Recommendations:

Recommendation	Pork Industry Specifics	Action Required
Standardize and define commonly used environmental terms , including "sustainable," "carbon-neutral," and "eco-friendly," based on measurable, science-based, sector-specific criteria.	Pork producers implement a variety of sustainability practices, such as methane capture, improved feed efficiency, and enhanced manure management. Terms may be misinterpreted without clear definitions, creating legal or reputational risks for producers.	<ul style="list-style-type: none"> Consult with agricultural stakeholders, including CPC, to create definitions that align with industry realities and scientific evidence.
Dismiss speculative challenges to environmental claims by requiring substantiation with credible evidence before initiating an investigation.	Pork producers are vulnerable to frivolous complaints from competing industries and activist groups. This not only diverts resources but also undermines legitimate claims.	<ul style="list-style-type: none"> Implement a preliminary claim challenge standard, such as requiring credible evidence and independent review, to prevent misuse of the guidelines.
Introduce anti-abuse mechanisms to prevent the guidelines from being weaponized by competitors and lobby groups.	Competing protein sectors and interest groups may exploit the guidelines to discredit pork producers unfairly. Safeguards are essential to maintain a level playing field.	<ul style="list-style-type: none"> Impose transparent penalties for entities engaging in frivolous or malicious complaints.
Provide flexibility for emerging sustainability practices by enabling producers to make qualified claims about ongoing or future initiatives with transparent timelines and measurable goals .	Many pork producers are transitioning to innovative practices, such as upgrades in infrastructure, automation technology or renewable energy adoption. The guidelines should support forward-looking claims tied to concrete action plans.	<ul style="list-style-type: none"> Permit claims such as "in progress toward carbon neutrality by 2030," provided producers disclose steps and timelines.

<p>Acknowledge the development of industry-based standards, such as Verified Canadian Pork (VCP), as valid benchmarks for substantiating environmental claims.</p>	<p>The pork industry is invested significantly in initiating industry-based principles that address animal welfare, public health and social responsibility, and is working on additional standards to address environmental stewardship and sector sustainability. Recognizing these efforts ensures producers are not penalized for operating under rigorous certifications.</p>	<ul style="list-style-type: none"> • Incorporate sector-specific standards as acceptable proof for environmental claims under the guidelines.
<p>Collaborate with the pork industry to develop cost-effective and practical methods for verifying environmental claims.</p>	<p>Small and medium-sized producers often lack the resources for complex audits. A tiered verification system can balance accountability with accessibility.</p>	<ul style="list-style-type: none"> • Provide simplified reporting mechanisms for producers that are easy to understand and report on.
<p>Environmental claims should not be tailored solely to satisfy public demands or address complaints but should be grounded in methodologies that align with comprehensive sustainability measurements. As outlined in the guidelines, these methodologies must integrate environmental factors with critical pillars of sustainability, including animal health and care and economic viability.</p>	<p>Pork producers operate in competitive markets, balancing sustainability investments with economic pressures. Claims must reflect achievable practices and ensure that compliance does not disproportionately burden producers and threaten sector viability.</p>	<ul style="list-style-type: none"> • Work with industry groups like CPC to develop methodologies that integrate environmental, animal health, and economic factors into a unified sustainability framework. • Offer tools or templates to help producers communicate sustainability efforts in alignment with the guidelines. • Ensure that methodologies and requirements are developed based on science and industry consultation rather than being reactive to public or activist pressures. This will protect the integrity of claims and ensure they represent true progress in sustainability.
<p>Develop an efficient and accessible process for resolving disputes over environmental claims, especially when allegations of greenwashing arise.</p>	<p>A streamlined, fair process will protect producers from drawn-out disputes and ensure that competitors or interest groups do not misuse the guidelines.</p>	<ul style="list-style-type: none"> • Create an independent adjudication panel with agriculture and sustainability expertise to evaluate disputes objectively.

		<ul style="list-style-type: none"> • Establish clear timelines for dispute resolution to avoid prolonged uncertainty for producers. • Allow producers to present evidence or certifications demonstrating compliance, with the option for third-party mediation if necessary.
<p>Data collection and analysis should be used to monitor the impact of the guidelines and evaluate their effectiveness and unintended consequences.</p>	<p>Continuous evaluation will ensure the guidelines remain effective, fair, and aligned with the needs of producers and consumers.</p>	<ul style="list-style-type: none"> • Collect feedback from producers on compliance challenges and costs. • Track consumer confidence and behaviour regarding environmental claims in the agricultural sector. • Use findings to refine the guidelines and address gaps or inefficiencies.
<p>Reinforce a clear and transparent enforcement process, ensuring producers can address concerns or rectify claims before penalties are applied.</p>	<p>Transparency in enforcement will reduce uncertainty among producers and promote voluntary compliance without creating a punitive environment.</p>	<ul style="list-style-type: none"> • Provide producers with a grace period or warning system for first-time non-compliance, particularly when errors are minor or unintentional. • Ensure that enforcement actions are proportional to the nature of the alleged violation, differentiating between accidental misstatements and deliberate greenwashing.
<p>Ensure Canada’s guidelines align with global frameworks (e.g., ISO standards) to maintain competitiveness in export markets. This will provide more clarity than relying on an “internationally recognized methodology”.</p>	<p>Canadian pork producers rely on exports and face competition from international producers. Misaligned rules could restrain their ability to market sustainable products abroad.</p>	<ul style="list-style-type: none"> • Engage international trade bodies and stakeholders to harmonize Canada’s framework with established global practices.

CPC, based on the greenwashing guidelines and recommendations it has provided, also encourages the Competition Bureau to strengthen its collaboration with the government, especially Agriculture and Agri-Food Canada (AAFC), to support the sector in improving its sustainability performance. Strengthened

cooperation will ensure that the guidelines are practical, implementable, and beneficial to both producers and consumers. Therefore, CPC provides the following recommendations:

Recommendation	Pork Industry Specifics	Action Required
<p>Collaborate with Agriculture & Agri-Food Canada to introduce accessible/adequate compliance incentives to encourage producers to adopt sustainability practices and comply with the guidelines.</p>	<p>Incentives will reduce the financial burden on producers, particularly smaller operations, and promote the widespread adoption of sustainable practices, ultimately benefiting the industry and consumers.</p>	<ul style="list-style-type: none"> • Offer tax credits for achieving recognized sustainability certifications, such as Verified Canadian Pork (VCP). • Create government-sponsored sustainability programs that reward producers for measurable environmental improvements, such as reduced greenhouse gas emissions or improved soil health.
<p>Implement government public education campaigns to improve consumer understanding of environmental claims including certification programs in place that substantiate claims.</p>	<p>Industry groups like CPC ensure on-farm compliance and assurance measures through national programs. The government should also educate consumers that they are less likely to be misled by greenwashing and more likely to value and trust legitimate claims, benefiting producers and fostering market confidence.</p>	<ul style="list-style-type: none"> • Work with industry groups like CPC to ensure that methodologies and requirements of on-farm programs are developed based on science and industry consultation rather than being reactive to public or activist pressures. This will protect the integrity of claims and ensure they represent true progress in sustainability.

In summary, it is critical to highlight that while we understand the intended purpose of these regulations, they do not effectively combat disinformation and may fail to protect industries, such as ours, actively working to improve transparency. Without appropriate safeguards, lobby groups could weaponize such regulations to discredit legitimate environmental efforts. Furthermore, the burden of proof should rest with those making accusations rather than the industry. Environmental claims should only be challenged based on verifiable evidence, and any assessment must rely on methodologies that align with comprehensive sustainability measurements rather than arbitrary standards.