



March 18, 2025

The Temporary Foreign Worker Program
Employment and Social Development Canada
142 Promenade du Portage
Gatineau, QC J8X 2K3

Via e-mail: edsc.dgce.tet-tfw.seb.esdc@hrsdc-rhdcc.gc.ca

Re: Discussion paper on the Stream-Specific Work Permit

To whom it may concern,

Canadian Canola Growers Association (CCGA) and Grain Growers of Canada (GGC) respectfully submit these comments in response to Employment and Social Development Canada's (ESDC) discussion paper on the proposal to introduce a stream-specific work permit.

CCGA represents 40,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs that impact farm profitability. CCGA is also the largest administrator of Agriculture and Agri-Food Canada's Advance Payments Program (APP).

Grain Growers of Canada (GGC) represents over 70,000 producers through our 14 national, provincial and regional grower groups. Our members steward 110 million acres of land to grow food for Canadians and for 160 countries around the world, creating \$45 billion in export value annually. As the farmer-driven association for the grains sector, GGC champions federal policies that support the competitiveness and profitability of grain growers across Canada.

Background

As stated in our previous submissions, we would like to highlight again the difference between the needs of grain and oilseed farmers for temporary foreign workers with the needs of other agriculture industries.

While grain and oilseed farmers typically require less on-farm labour than other agriculture commodities (our industry employed about 1,800 foreign workers in 2022¹), due to productivity advancements, such as more sophisticated equipment and innovation, they consequently experience the most in lost sales when their labour requirements go unfulfilled. According to a Labour Market Information study commissioned by the Canadian Agriculture Human Resources Council (CAHRC), the industry faced 2,300

¹ Canadian Agriculture Human Resource Council. *Grain and Oilseed Labour Market Information and Forecast 2023-2030*

vacancies in 2022, resulting in an estimated loss of \$1.27 billion². In 2022, two in five employers in the grain and oilseed sector were unable to find the workers they required³. Thus, it is important for grain and oilseed farmers to have an option to access temporary foreign workers when needed, particularly those workers with the skills required to operate advanced, technical farm machinery used on grain farms today. In fact, our reliance on this type of labour continues to grow. From 2020 to 2023, there was a 43% increase in the number of temporary foreign workers employed on Canadian grain farms⁴.

CCGA and GGC appreciate ESDC's efforts to streamline the Temporary Foreign Worker Program (TFWP) to make the process easier, faster and better equipped for both employers and temporary foreign workers. However, we highlight that the skill level requirements for temporary foreign workers for grain and oilseed farms, as well as their compensation level, are much different than many other primary agriculture commodities. Temporary foreign workers employed by grain and oilseed farmers enjoy a much higher average wage and are provided the accommodations that exceed requirements. A "one size fits all" approach is not feasible when comparing the needs of SAWP farms to those of grain and oilseeds farms. While this may benefit SAWP farms that rely on third-party recruitment with an oversupply of willing workers that do not require high skills to operate farm machinery and can easily be trained on the spot, it does little to address the challenges faced by the grain and oilseed sector. Our primary concern is recruiting skilled workers, often from developed European countries, and processing their work permits, which currently might take up to 24-36 weeks.

Stream-Specific Work Permit Concerns

Under the new proposal, temporary foreign workers will receive a stream-specific work permit compared to an employer-specific work permit under the current rules. While this provides the employee with labour mobility within the agricultural sector, for the grain and oilseeds sector, a shift to a stream-specific work permit presents risks, including increased poaching of skilled workers. Employers undertake substantial costs to apply to the TFWP in addition to the complex and timely process of recruiting employees – from obtaining the Labour Market Impact Assessment (LMIA), spending significant time and efforts to find and recruit the foreign workers with the required high skills to paying for transportation to and from Canada. In addition, the employer is bound by the wage rate set forth in the original application and cannot increase it to incentivize the employee to stay.

Once temporary foreign workers are established in Canada, it becomes easier for a different employer to recruit them under a stream-specific permit. The new employer would not have incurred the application fees and airfare costs to bring them to Canada. This is because the temporary foreign worker can move throughout the sector without applying for a new work permit. Unfortunately, this results in the original hiring employer losing the temporary foreign worker after spending considerable time and capital dedicated to recruiting the employee.

We underscore that the primary concern is not the transportation costs but the potential for employers to exploit this system by hiring pre-vetted workers from other employers instead of investing in recruitment. This would place significant strain on employers who have already undergone the rigorous hiring process, leaving them unable to replace lost workers in a timely manner. This poses a significant

² Ibid

³ Ibid

⁴ Canadian Agriculture Human Resource Council. *The Temporary Foreign Worker Program (TFWP) Used by Canola Growers*.

risk of financial losses, particularly during critical seeding or harvesting seasons when the sudden departure of skilled workers can lead to operational delays. For grain and oilseed growers, who rely on qualified labour to operate complex machinery, such turnover can have substantial financial consequences. Each day of delay during peak season can cost farmers thousands of dollars and add considerable stress, as their annual income depends on a narrow timeframe to complete seeding or harvest, for example. Unlike SAWP workers, our sector's TFWs are highly skilled and not interchangeable across different agricultural operations. It is not as easy to find a new worker who would have the required skills, knowledge and experience, and recruitment takes a long time – usually 6 months in advance.

In regards to “sharing” of employees between farms under the stream-specific permit—while this may work for the fruit and vegetable industry that has different timing of events, it is not possible for the grain sector, which works on the same seasonal cycle.

Recommendations

In conclusion, our recommendation from the previous submission remains the same. We recommend that the work permit remains employer-specific, but we encourage the creation of an online portal that allows a temporary foreign worker to apply for a new work permit with any employer who has a valid and open LMIA in a timelier manner.

Thank you for the opportunity to provide comments on the proposed changes to the Temporary Foreign Workers Program for agriculture. CCGA and GGC look forward to continuing to work together to ensure that the new Agriculture and Fish Processing stream works well for both Canadian grain and oilseed farm employers and temporary foreign workers, helping to address labour shortages and to reach our industry's full potential.

Sincerely,

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