



March 18th, 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: Transportation Requirements Discussion Paper

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 Temporary Foreign Worker Program (TFWP) transportation requirements.

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 in 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 vacancies in 2022, resulting in an estimated loss of \$1.27 billion². In 2022, two in five employers in the

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

² Ibid

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.

Transportation Requirements

Approach #3 of transferring transportation obligations is the fairest solution for managing transportation for temporary foreign workers in the grains and oilseeds sector. Under this approach, employers who recruit workers from other farms should bear the full responsibility for transportation costs. This is because recruiting, vetting, and hiring a worker involves considerable time and effort, including ensuring the worker has the necessary skills, managing work permits, booking flights, and organizing transportation and housing. As such, it is seen as unfair for employers to gain workers without making a similar investment. Employers who “poach” TFWs—i.e., hire workers already employed elsewhere—should fully cover the transportation costs, including airfare and any related expenses.

Approach #1, which suggests creating a centrally managed transportation pool, would add unnecessary administration and increase costs, particularly for grain farmers, who would need to retain control over flight schedules and other logistics. Government involvement should be limited to resolving disputes, not managing transportation. This ensures that employers who invest in the hiring process and related logistics are not unfairly burdened by additional costs.

Regarding housing and job transitions, it is suggested that workers be given at least two weeks to find a new job or prepare for departure, similar to the notice period when someone resigns from a job. The responsibility for providing housing should be contingent upon the situation. If a worker is let go or their position is no longer available, the housing previously provided may be needed for a replacement. On the other hand, employers should not be required to cover the cost of last-minute changes to return flights when a worker decides to leave early. In such cases, workers should be responsible for the additional costs of last-minute airfare.

In terms of transportation arrangements, flexibility is key. While sectors like grains and oilseeds may book flights three months to one week in advance, last-minute changes may be allowed depending on the type of ticket purchased, with a cost difference based on seat availability. Workers traveling from distant locations may experience multi-day travel periods, though lodging is rarely required for short layovers, and meals are generally an out-of-pocket expense.

Recommendations

Overall, the approach to transportation should be flexible and sector-specific, allowing employers to maintain control over the hiring process and related logistics. Government involvement should be kept to a minimum, ensuring that employers are not burdened by additional administrative processes. The focus should be on fairness for employers who bear the costs of recruitment and training, while also giving workers adequate time to transition between jobs or prepare for their return home.

³ Ibid

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

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 transportation requirements work 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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