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November 3, 2023

Standing Committee on International Trade 131 Queen Street, 6<sup>th</sup> Floor House of Commons Ottawa, Ontario K1A 0A6

Dear Committee members:

Subject: Study on the effects of the proposed Canadian Biocides Regulations on competition from foreign products on Canadian soil

The Canadian Federation of Independent Business (CFIB) represents 97,000 small and mediumsized businesses across every industry and region in Canada.

We are writing to share our members' views on the proposed Canadian Biocides Regulations as they relate to competition from foreign products on Canadian soil. Our Quebec members in this sector have told us that the proposed regulations will affect their ability to remain competitive with American products and could jeopardize their viability.

In particular, the proposed regulations would introduce lower fees and shorter registration timelines for foreign products. According to our members, this could benefit American multinationals at the expense of Canadian manufacturers.

Health Canada has committed to implementing a single regulatory framework for biocides (disinfectants and surface sanitizers). Under this regulatory framework, Canadian products will be subject to more cumbersome administrative procedures to obtain registration. Our members in this sector are concerned that creating a new category of regulated products will slow down the file review process, particularly for surface sanitizers.

We strongly encourage Committee members to recommend changes to these proposed regulations and to work with the industry to find solutions that work for all stakeholders.

Yours sincerely,

Jasmin Guénette

Vice-President of National Affairs