

A REVIEW OF CANADA'S SEASONAL AGRICULTURE WORKER PROGRAM

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Executive Summary

This report provides new evidence regarding the challenges producers experience using the Seasonal Agriculture Worker Program (SAWP) and other Temporary Foreign Worker Program (TFWP) streams to access workers for seasonal farm work when Canadians are not available.

A survey conducted by the Canadian Agricultural Human Resource Council (CAHRC) on behalf of the Foreign Agricultural Resource Management Services (F.A.R.M.S.) was distributed to 1,400 producers in Canada. The purpose of the survey was to collect information on the challenges producers are experiencing with the administration of the TFWP by Service Canada and Employment and Social Development Canada (ESDC). The survey achieved a high participation rate of 39 per cent over a one-week period in November 2017.

In the survey, producers indicated they are encountering critical issues with the administration of the program, which has created a looming crisis for these growth-oriented farms and affected the viability of their farm operations. The issues identified in this report are putting many Canadian businesses and jobs at risk in Ontario and the Atlantic provinces and they are also causing serious physical and mental health issues for farmers and their families, including reports of suicidal thoughts. Many of the respondents to the survey are family businesses that have been farming for over a century or longer.

The SAWP was created over 50 years ago and exists today to help Canadian seasonal producers address chronic labour shortages. This program pre-dates the TFWP. The SAWP was developed in response to agriculture's unique workforce challenges, which include seasonality, rural locations, and the physical nature of the work.

Canadian farmers spend significant time and effort recruiting Canadian workers; however, seasonal farm work does not provide permanent, year-round employment for Canadians. Thus, seasonal farm work positions are very difficult to fill. Seasonal work makes up 53 per cent¹ of Canada's paid agricultural workforce and is an integral part of our Canadian food system, providing safe, sustainable Canadian-grown fruit and vegetables for grocery shelves here in Canada and abroad.

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SAWP Benefits the Canadian Economy

The SAWP benefits the Canadian economy, Canadian consumers and Canadian farmers. It is also an incredibly important program for international workers, providing them with an income to support a better standard of living and education for themselves and their families.

In 2016, horticulture farms produced over \$6 billion in annual direct farm cash receipts,² with Canadian vegetable exports accounting for \$1.5 billion and fresh fruit exports accounting for \$1.2 billion³. According to research conducted for this survey and previous research conducted by CAHRC, horticulture producers are achieving growth for their production and markets that exceeds the forecasted increase of Gross Domestic Product (GDP) for Canada.⁴

The Government of Canada's Economic Advisory Council's report, *Unleashing the Growth Potential of Key* Sectors⁵, spearheaded by Dominic Barton, highlighted agriculture as a high-growth sector with untapped

potential. Horticulture producers who use the SAWP and other TFWP streams are well positioned to help the federal government achieve its Budget 2017⁶ objectives to grow Canada's annual agri-food exports from \$56 billion to \$75 billion by 2025. To achieve the federal government's high-growth agri-food agenda, more farm workers, including seasonal agriculture workers, will be needed.

Government Administration Poses Challenges

Service Canada administers the Labour Market Impact Assessment process that allows farmers to access the TFWP. In addition, the Integrity Services Branch oversees farm audits. Both divisions report to Employment and Social Development Canada (ESDC).

The research collected from the survey indicates that Service Canada's administration of the program has deteriorated significantly for producers who are long-time users of the SAWP and other TFWP programs.

The following topics were included in the survey to collect information on these critical issues:

- Job Bank advertising rules;
- Labour Market Impact Assessment (LMIA) processing times;
- Replacement worker and worker transfer times;
- Agriculture LMIA refusals; and
- The audit process.

Respondents reported that increases in processing times, higher rates of refusal in these administrative areas, and the audit process were preventing them from hiring enough workers and putting their farms and Canadian jobs at risk.

Communication issues were also explored in the survey, with 15 per cent of respondents reporting that they received contradictory information from Service Canada officers in 2017 in the following areas:

- Audits;
- Government of Canada Job Bank advertising issues;
- Changing advertising requirements and other rules; and
- Lack of clarity and coordination among Service Canada officers.

Respondents reported that the Integrity Services Branch audit timelines have not been supportive of farm operations that are reliant on the weather cycles that include spring work and harvest. According to the survey, audits are taking on average 4 months with some audits taking as long as 12 months. Currently:

- 11 per cent of respondents report LMIAs being held up by Service Canada due to farm audits;
- 32 per cent are not receiving enough information regarding their audit process; and
- 17 per cent have not been told what kind of audit their farm is under.

Consequently, many respondents reported a looming crisis, as many of the farms affected are in jeopardy of going out of business by next year if paperwork is not processed in time for their seasonal workers to arrive for spring 2018.



This would constitute an economic catastrophe; the farms at risk of going out of business currently provide direct jobs for 2,315 Canadian workers in Ontario and Atlantic provinces. The livelihoods of 2,390 long-term SAWP employees are also in jeopardy. The wages of these returning farm workers (from Barbados, Eastern Caribbean, Jamaica, Trinidad & Tobago, and Mexico) are the primary income for their families in these host countries. There is also a larger cumulative impact for upstream and downstream jobs in these rural communities.

Service Canada Communication Creates Issues

Service Canada's communications are deteriorating, which is creating confusion and delays that put producers' businesses at risk. This has significant consequences for the Canadian economy and the workers—both Canadian and foreign—who rely on agriculture for their livelihood.

Survey participants suggested practical solutions for improving the administration of the SAWP and the Agricultural Stream. Improved and better communications with producers and supporting industry associations, including consistent administration from Service Canada and ESDC officers, will drastically improve the program delivery for farmers. The proposed recommendations included in this report are important for the Government of Canada to consider in order to avoid the impending crisis facing these Canadian family farms.

Introduction

Agriculture has played an important part in Canada's economy since the country's founding, and primary agriculture production continues to expand to this day. In 2015, Canada's agriculture sector achieved its second-highest level of production on record, exceeded only by the bumper crop of 2013. Today, Canada's agriculture sector plays a significant role in feeding both Canadians and the world; it is a major global producer of many agricultural products, and its exports relative to production are among the highest in the world.

Already, labour shortages have led the sector to steadily increase its reliance on foreign workers, who now account for more than one in ten people in the sector's workforce. While this still leaves domestic workers as the vast majority of the agricultural workforce (88%), it makes the sector increasingly vulnerable to policy changes or other unpredictable factors that could significantly reduce access to foreign labour.⁷

Agriculture Labour Market Information

Agriculture Faces Critical Labour Issues



Research conducted by the Canadian Agricultural Human Resource Council in 2014 shows a critical gap between the demand for agriculture workers and the supply of available workers. This national gap has doubled in the past 10 years, growing to approximately 60,000 workers. By 2025, the labour gap is expected to grow to 114,000 workers. The job vacancy rate for the industry

is higher than any other industry in Canada, at 7 per cent, an issue that translates into \$1.5 billion in lost sales.

For horticulture commodities, the labour gap was 35,700. The SAWP, however, is instrumental in filling this critical labour gap; in 2014, the SAWP enabled Canadian farmers to successfully fill this seasonal labour gap with 35,000 seasonal workers. However, over the next decade, fruit and vegetable farmers' difficulty in finding workers is expected to intensify as the domestic workforce continues shrinking. By 2025, this labour gap is expected to increase to 46,500 for horticulture commodities.

Stakeholders consistently report that there would be no horticulture production in Canada without the SAWP. Horticulture producers hire Canadians first, but when Canadians are not available, SAWP and Agricultural Stream workers help them to fill vacancies and mitigate the risks associated with this labour gap.



Seasonal Jobs = 113,000

(53% Paid Workers)

Canadian Agricultural Workforce

F.A.R.M.S Survey Examines SAWP Impact

The Canadian Agricultural Human Resource Council conducted an online survey in November 2017 on behalf of the Foreign Agricultural Resource Management Services members who use the Seasonal Agriculture Worker Program and other Temporary Foreign Worker Program streams. F.A.R.M.S. represents 1,400 producers from Ontario and the Atlantic provinces.

The survey was commissioned to provide details about SAWP economic benefits to the Canadian economy, including production and export data, employment numbers, producer recruitment efforts, and trusted employer factors, as well as to provide feedback regarding ESDC, Service Canada, and Integrity Services Branch administration of the SAWP and the other agricultural streams farmers use for primary agriculture.

A substantial 39 per cent response rate was achieved over a one-week period, with over 548 farmers responding to the survey. This strong participation rate provides solid data from producers who use the TFWP to fill critical vacancies for labour-intensive crops. Of the 548 survey respondents, 92 per cent of respondents are from Ontario, with 1 per cent of responses coming from New Brunswick, 5 per cent coming from Nova Scotia, 1.5 per cent coming from Prince Edward Island and 1 response each from Quebec and Newfoundland. The respondents participating employ a total of 21,348 farm workers: Canadian farm workers and Temporary Foreign Workers through the SAWP, Agricultural Stream and the other TFWP streams.

Seasonal Agriculture Worker Program Benefits

The SAWP is an effective labour mobility program, celebrating over **50** successful years of collaboration with the Canadian government, workers and their respective international governments. Internationally, the SAWP has won many awards as a successful labour mobility model. Employees participating in the

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SAWP complete a season of work in Canada and then return to their home countries. Built on bilateral agreements with Mexico and Caribbean countries, the SAWP includes carefully constructed rules protecting Canada's seasonal workers. The program includes formal signed contracts that outline expectations of growers and benefits to seasonal employees. Local liaison officers are supplied by home countries and they work with Canadian officials to care for SAWP employees while they are in Canada. The program has been developed in cooperation with Canadian authorities and is reviewed annually with growers and participating countries working together on program improvements to safeguard labour rights for seasonal employees.

According to the TFWP directorate, primary agriculture makes up 60 per cent of the TFWP. The SAWP program was designed to ensure Canadian workers would still be hired first before agricultural employers turned to a foreign source of labour. There are many other trusted employer principles built into the SAWP, including fair wages that are regulated by the provinces and the federal government to protect workers. Employers who break the rules are removed from the program. Stakeholders report that they support an integrity approach to the TFWP and seek to work in partnership with the federal government to improve programming. Producers using the SAWP also expect a balanced approach to TFWP administration; when Canadian farms advertise jobs and Canadians do not apply, farmers should have the right to access seasonal foreign workers through a fair and efficient process.

SAWP Benefits the Canadian Economy

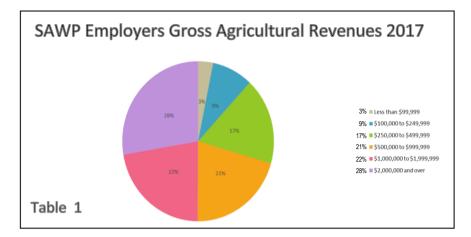


Horticulture crops are comprised of over 120 varieties of fruits and vegetables grown in every region of Canada and contributing over \$6 billion in annual direct farm cash receipts⁸ to Canada's GDP. There are over 27,500 horticulture farms on 1,000,000 total acres of farm land. The 548 survey participants grow the following crops as well as many other crops not listed here:

- The field fruit and vegetable industry includes farms that produce root vegetables, melons, sweet corn, tomatoes, and peppers.
- The tree fruit and vine industry includes farms that produce tree fruits (such as apples, apricots, cherries, pears and peaches), tree nuts (such as walnuts and hazelnuts), berries, and vineyards.
- The greenhouse, nursery, and floriculture industry produces nursery crops, trees, flowers, ornamental plants, and crops of any kind grown under cover.

Growing these horticulture crops is very labour intensive, involving hand picking, harvesting and many other physically strenuous jobs. The vast majority of the work is also seasonal, takes place in rural areas where there is a smaller population, and involves the handling of live plants with growth cycles reliant on the weather.

Survey respondents indicated they are focused on high growth objectives, with 65 per cent of growers expecting to increase their production in the next 2 to 3 years, if they have access to an adequate workforce. According to other Labour Market Information CAHRC has conducted, horticulture commodities are expected to grow production at a rate of 2 - 2.5 per cent per year⁹. This is more than the forecasted increase of GDP for Canada, which is 1.7 per cent per year¹⁰. In this November 2017 survey, half of the respondents reported sales of \$1 million or greater, and the average farm participating in the study had production gross receipts of \$1.78 million.

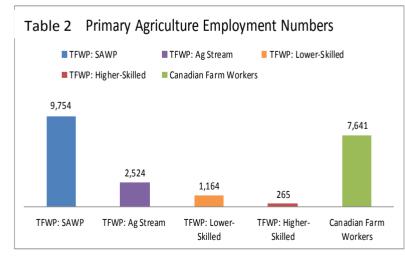


As table 1 indicates, there is a broad variety and size of farm operations that participate in the TFWP primary agricultural programming (SAWP and Agricultural Stream). When Canadian workers are not available, the SAWP and other streams help farmers stay competitive by filling their vacancies with seasonal farm workers. These programs assist small farmers with under \$99,000 in production, mid-sized operations, and farms with over \$2 million in sales. The survey results indicated the average amount of exports per farm for the 2017 season is \$415,862. Over 70 per cent of the survey respondents, however, had sales of \$450,000 or more per year. Canadian vegetable exports totaled \$1.5 billion in 2016, and fresh fruit exports totaled \$1.2billion¹¹.

The Canadian horticulture sector contributes \$15.7 billion to the Canadian economy and supports 181,600 Canadian jobs¹². The Government of Canada's Economic Advisory Council, led by Dominic Barton, highlighted agriculture as a high-growth sector with untapped potential. SAWP users are growth-oriented horticulture producers who are well positioned to help the Government achieve its 2017 budget objectives to grow Canada's annual agri-food exports from \$56 billion to \$75 billion by 2025. To achieve this high growth agri-food agenda, producers will require more farm workers.

SAWP Positively Impacts Canadian Employment

The 548 farmers responding to the survey employ 21,348 farm workers, including Canadian farm workers



and Temporary Foreign Workers from the SAWP, Agricultural Stream and other streams available. This research focuses primarily on the SAWP as the predominate stream used by farm employers. There was a total of 13,707 TFWs that were reported in this survey. On these Ontario and Atlantic farms, there are 7,641 Canadian farm workers employed. On average, each producer participating in the survey reported that they approximately 20 employ farm

workers through the SAWP. On these same farms, respondents reported that they employed, on average, more than 15 Canadian farm workers.

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Even more Canadian jobs are created downstream from these farms in the primary processing and packing businesses, and also upstream where producers buy their inputs such as fertilizer, seed, and equipment. As mentioned in the previous section, the Canadian horticulture sector contributes \$15.7 billion to the Canadian economy and supports 181,600 Canadian jobs such as processing, trucking, marketing and many other occupations¹³. Alternatively, when farmers cannot get seasonal workers in time for the Canadian crop season, this puts over 180,000 Canadian jobs throughout the value chain, in jeopardy.

According to the *Economic Impact of the Seasonal Agricultural Worker Program in the Ontario Horticulture Sector* report, "field horticulture, as defined above, had direct, indirect, and induced economic impacts in terms of output amounting to just over \$2.1 billion as well as almost \$1 billion in GDP and 10,250 jobs. Greenhouse horticulture had direct, indirect, and induced economic impact of almost \$3.3 billion, with an impact on GDP of about \$1.6 billion and just over 24,000 jobs. When these are combined to provide an estimate of economic impact for Ontario horticulture, the impacts on output are \$5.4 billion, \$2.6 billion in GDP, and about 34,280 jobs.¹⁴" The job multiplier effect of over 2 Canadian jobs for every seasonal job is provided in the **appendices** in an infographic and the online video F.A.R.M.S. produced in the fall of 2017.

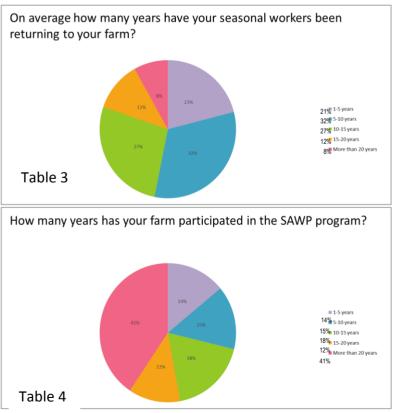
SAWP Trusted Employer Evidence



An experienced and trained workforce is extremely important for producers who farm seasonal crops. Survey participants indicated their seasonal workforce has an extremely high retention rate, with 59 per cent of their SAWP workforce returning to their farms for between 5 - 15 years, as shown in table 3.

Producers participating in the survey also indicated that their longestserving seasonal workers had been returning to their farms, on average, for 15 years. Some respondents reported SAWP employees returning to the same farm for as long as 45 years. This indicates an excellent retention rate of experienced and trained seasonal workers that is a competitive advantage for Canadian producers who farm seasonal crops.

As table 4 indicates, over 40 per cent of respondents indicated that they have participated in the SAWP for more than 20 years. This indicates the vast majority of farm employers that are members of FA.R.M.S. have been using the SAWP for a long time and are familiar with its rules and expectations.



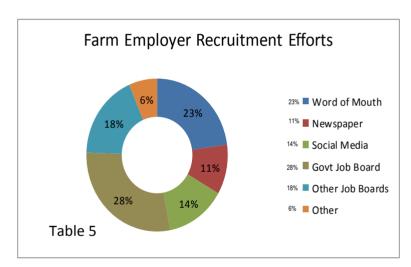
Both the longevity of employers using the SAWP and the longevity of returning seasonal employees is indicative of good human resource management by these SAWP employers and it also indicates a level of satisfaction by the workers themselves.

SAWP Employers Recruitment Efforts for Canadian Workers

Producers hire Canadians first. This is built into the fundamental requirements of the TFWP. The following advertising requirements are documented on the Employment and Social Development Canada website¹⁵:

"All employers are encouraged to conduct <u>ongoing recruitment efforts</u>, including advertising the job or contacting the underrepresented groups that face barriers to employment...Employers must also conduct recruitment activities consistent with the normal practice for the occupation for a minimum of 14 calendar days. To meet this requirement, employers can choose one or more of the following methods to advertise: on recognized Internet employment sites; in local and regional newspapers, newsletters; in ethnic newspapers and Internet sites; in local stores, places of worship, community resource centres; in local and regional employment centres."

The TFWP also requires many other detailed advertising requirements to be included in advertising



including benefits packages, wages, skills requirements and work experience and this proof of recruitment and advertising must be kept 6 years.

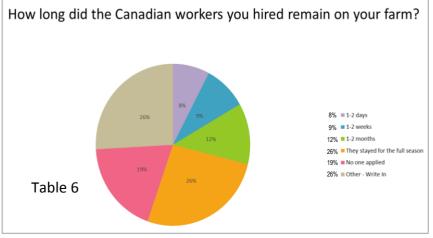
Farm Employer Recruitment Efforts

Survey responses demonstrate that respondents use a wide variety of recruitment methods and participate in ongoing advertising that goes beyond the TFWP requirements. Respondents indicated that they use online outreach and a multi-media

recruitment strategy. Some of the advertising methods used by producers include word of mouth, newspapers, social media, government job boards, other job boards and other strategies beyond those listed.

Canadian Farm Workers

Survey respondents also indicated how long Canadian workers stay working on their farm for the crop season. Farmers participating in the survey reported that Canadian workers tended to stay a short time:



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- 17% of employers reported that Canadian workers stayed for 1 day 2 weeks (8% + 9%);
- 12% of employers reported that Canadian workers stayed for 1 2 months;
- 19% of employers reported that no one applies for jobs after vigorous advertising and recruitment activities; and
- 26% of employers reported that Canadian workers stayed for the full season.

One producer included the following insight, "It depends on the job that they are hired for. If they're [hired for] sales staff, most stay the full season or as long as they're needed. If they're [hired for] staff doing harvesting most Canadian workers stay less than a week and leave without notice or time to find replacements."

Other comments regarding employment of Canadians on fruit and vegetable farms included:

- "No one applied for picking or planting."
- "No one applied that was available for harvest."
- "None; they never even started work. If they apply, once they hear the hours & duties they change their mind and don't show up for work."
- "Of the 4 applicants only 1 was hired. The others did not want the position once they realized it was seasonal. The one person we did hire stayed for the full season."

In an open comment section, producers were asked, **"If SAWP and Agricultural Stream workers are not** available to fill your vacancies, what would this mean to your farm?" Over 200 respondents replied that their farm would <u>cease to exist or go out of business</u>. Other comments included:

- "It would be devastating to our farm and business."
- "It would result in crop failure; zero chance to grow."
- "I have not had a local Canadian worker apply for a job in over 5 years of constant recruitment."
- "I can't mechanize anymore."
- "I would be extremely saddened to tell our SAWP workers that they no longer have jobs with us."
- "SAWP workers have to be here to initiate the work in order for Canadian workers to continue."
- "Work is weather related and any delay in the heavy duty jobs only delays the later duties for the older workers and students whose employment term will be shortened."
- "Canadian workers depend on SAWP."

Government Administration Challenges

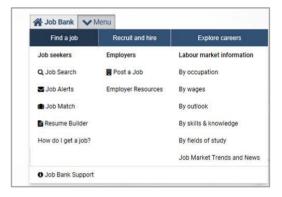
The Labour Market Impact Assessment process, which is overseen by Service Canada, who in turn reports to Employment and Social Development Canada, has been offline for over 8 months. This means that over 50 pages of forms per worker have to be faxed or couriered into Service Canada offices across Canada. Ontario and Atlantic SAWP applications and Ontario Agricultural Stream applications are sent to the Simcoe, Ontario Service Canada office to be processed.

In addition to the inconvenience and delay caused by this issue, survey respondents identified a number of serious challenges posed by the current system, including Job Bank advertising rules, lengthy processing times, an increased refusal rate, and a lengthy and opaque audit process.



Job Bank Advertising Rules Interfere with Recruitment

Issues with the Federal Government Job Bank are hampering producers' ability to conduct ongoing



recruitment efforts. As noted in the previous section, ongoing recruitment is a recommendation on the website of the TFWP primary Agricultural Streams: "All employers are encouraged to conduct ongoing recruitment efforts.¹⁶" When the advertisement expires on the Job Bank, however, there is a 14-day wait time before the advertisement is reposted on the Job Bank. This wait time interrupts ongoing recruitment efforts, since farmers need proof of advertisement on the Job Bank in order to qualify for the TFWP Labour Market Impact Assessment (LMIA) process.

This is a serious issue affecting approximately 46 per cent of survey respondents.

Production of fruits and vegetables and the labour needs of these farms are controlled by the weather, which means that farmers cannot afford any delay in hiring. However, because they must follow full LMIA process, including advertising rules, farmers who need a replacement worker or a worker transfer must wait 14 days for the job advertisement to be re-posted by the Job Bank administration. This lost time is devastating for producers.

In the survey, producers explained how lack of an ongoing advertising option on the Job Bank is impacting their farm operations:

- "If our ads aren't worded exactly to specification of Service Canada we have to redo the 2 week period, setting back the application process; this creates a lot of wasted time uploading advertisements every 2 weeks into the Job Bank that gets 0 Canadian responses."
- "On our farm our family is working 7 days a week 12 to 14 hours a day. We don't have time to continuously extend the job bank expired advertisement. We always post ads for all our positions and we never get a call at all. Mother Nature doesn't wait. Due to the 14 days it took to put our farm's advertisement on the Job Bank, I lost a good part of my crop to frost because I couldn't find workers because my advertisement expired during harvest so we had to wait the 14 days then wait another 4 or 6 weeks for the LMIA to get approved. This doesn't make sense."
- "Some seasonal farm workers may have to leave our farm workforce for personal or health reasons. When this happens we require a worker transfer or a replacement worker immediately to keep up with our production plans. Previously, the replacement worker process was very efficient, however, the new advertising requirements and the 14 day wait time makes the replacement too much work in the middle of an already busy seasonal operation."



Producers also raised other issues, including concerns that they cannot put the actual start date in the advertisement for their spring work as the Job Bank does not allow advertising that far in advance. This point also works against recruitment for Canadian workers who are available for seasonal jobs but who do not apply for these jobs in the winter, 8 months prior to the seasonal job's start time. But the jobs are required to be posted in order to begin the lengthy LMIA process. Producers also report that the categories they have to choose from do not match the work that takes place on their farms and there is no place for them to describe the type of farm work experience they require for their modern farm operations. Another issue for survey respondents is the predominance of foreign applicants – not Canadians. Many stakeholders report that 95 - 100 per cent of the Job Bank respondents are from outside the country and respondents explained that the "only applications I receive through the job bank are people looking for work from other countries (mostly from India and eastern European countries)."

Increasing LMIA Processing Times Impact Production and Sales



Respondents reported that although they are getting their LMIA forms into Service Canada sooner, the approval time is taking longer. In the past, respondents indicated that the LMIA approvals took on average 4.6 weeks. In 2017, survey participants reported that the LMIAs processing time increased, on average, to 6.6 weeks, with some taking over 20 weeks or more.

The increased timelines for the LMIAs means farmers now have to

submit their paperwork in December or earlier while their harvest is still ongoing in order to have workers for spring. The LMIA approval affects their business plans for the next crop season including the quantities of fertilizer, seed and other inputs that are needed to grow their fruits and vegetables and other crops. One farmer explained, "I am waiting on pins and needles to hear back about my LMIA. I am proceeding with crossed fingers, hoping that our labour needs will be met. This is a very nerve-wracking experience."

Respondents also explained their farms were experiencing a labour shortage due to the LMIA not being processed in time. This impacts farmers by causing lost production and sales. Stakeholders reported that they find it difficult to plan ahead when they don't know if they will be able to access workers next year. "When apples can't be picked, they fall on ground, meaning lost revenue," explained one respondent.

Longer LMIA administration impacts on farmers in 2017 included:

- "A lot of the work did not get completed resulting in lower quality product for export."
- "It affected our farm big time, halting our farm's operations."
- "We have considerable anxiety about whether our workers will arrive in time for the crucial pruning season. Are Service Canada workers knowledgeable about agriculture?"
- "We have apprehension and uncertainty regarding the upcoming season: will we have the workforce?"



Increasing Replacement Worker Process Times Reduce Production



The replacement worker process is an essential part of the SAWP and is needed when a worker goes home for emergency purposes or other reasons. Approximately 35 per cent of survey respondents use replacement workers. This farm vacancy needs to be filled quickly in order for the farm to continue its planned operations, including harvesting,

seeding, pruning, irrigation, spraying and many other jobs that are required on the farm.

Survey participants explained why replacement workers are important to their farms:

- "Agriculture is very time sensitive. Any delays or shortage of employee arrival is critical and always results in lost production and revenue that cannot be recovered in that year."
- "Worker replacements are crucially important to our farm. Fruit and vegetable crops need to be picked every day; long wait times can create problems for harvesting our crops."
- "We had one worker return home this year due to a family emergency. We did not even entertain the notion of a replacement because by the time we completed the necessary paperwork (even if our advertising HAD been current), it would have been too late."

Respondents explained that in the past, if a worker went home for emergency reasons, the paperwork for the replacement worker was processed in a week. In 2017, however, approximately 58 per cent of survey respondents reported that the replacement worker process was now taking over a month, which is not timely enough to meet their labour requirements. One producer explained that the process was "so slow this year, we didn't bother asking."

If the Job Bank advertisement expires while harvest activities are ongoing, even though the LMIA is approved for the same number of workers, the LMIA process starts all over again. Delays are costly when handling perishable crops, "Our livelihood is dying out in the field," explained one of the survey respondents.

Increasing Worker Transfer Times Delay the Hiring Process





Almost 65 per cent of respondents use worker transfers on their farms, indicating that worker transfers are very important to seasonal producers. Respondents reported that SAWP worker transfers are essential to their farm

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operation and also extremely important to the seasonal workers, allowing them seasonal job-sharing opportunities on Canadian farms, where they are able to complete a full 8-month term of work rather than returning to their country early. **Survey participants explained:**

- "Without it I wouldn't be able to maintain my work force and retain experienced workers. Once we have completed our 2 month asparagus season I have to transfer some of my workers to another farm because I don't require all of them for my watermelon crop. If they had to go home it would be unlikely they would want to return to my farm next year because they couldn't justify such a short employment period."
- "Extremely important because it allows the workers to complete their full 8 month work term if they so choose. During the growing season there are busy times and slow times. During slow times SAWP workers can be transferred to other farmers in the program and then come back when it's busy here."
- "Worker transfers are extremely critical at harvest it is important to be able to bring in additional workers to achieve harvest according to the seasonal needs."

Nearly one in three survey respondents (32 per cent) said that in 2017, the worker transfer process was not timely enough to meet their farm operation's labour needs, commenting that, "it takes between 1 to 2 weeks longer than it did in the past" and "if you don't have your ads placed in advance on the Job Bank, the waiting period is devastating." Respondents also clarified that the worker transfer process worked very efficiently in the past: "2 years ago it worked fine." Several farmers explained that they have given up on utilizing the worker transfer process. **Respondents wrote:**

- "We have given up on this and reduced our production instead."
- "I don't even try anymore; there is way too much paper work and it takes too much time to process."
- "Because of the complicated process we avoid transfers."

Agriculture LMIA Refusals Reduce Access to Critical Labour



Survey respondents reported an LMIA refusal rate of 4.2 per cent in 2017, and many also reported that the number of workers they requested was decreased by Service Canada officers. Producers were told that their role was to "employ Canadian workers," and one farmer explained, "We have been told by Service Canada that they believe we can operate our business without offshore workers, which is absolutely inaccurate."



Respondents report being refused by Service Canada because:

- "We could not get a worker transfer for harvest because our LMIA was denied. This happened because we filled out the wrong form because Service Canada changed the form Sept. 1 / 17. But we did not receive notification by Service Canada or ESDC that they had changed the form."
- "The job advertisement did not match exactly how the Service Canada wants to see it. Minor 'errors' in our advertising. This is open to interpretation."
- "I had all the information needed for the LMIA. However, it was just not worded the way Service • Canada wanted. It was absolutely ridiculous. We are so frustrated with Service Canada. We used to have such effective service and now it is a frustrating mess."
- "Service Canada claimed we did not demonstrate sufficient efforts to hire Canadians in the occupation due to the fact that we did not offer the seasonal job to a Canadian that lives 45 to 60 minutes away from the farm. Then when we offered him the job he declined it!!!"

Several producers also reported their LMIAs being held or refused due to ongoing audits.

Audit Process Puts Farm Viability and Canadian Jobs at Risk



Survey respondents reported 29 per cent of their farms have been placed under audit from the ESDC's Integrity Services Branch. The administration of the LMIAs and audit processes is creating a looming crisis for these growth oriented farms that use the TFWP to supplement their Canadian workforce. Survey respondents reported the following:

- 17 per cent have not received communications indicating what kind of audit their farm is under. ٠
- 32 per cent say they are not receiving enough information regarding their audit process, the parameters of the audit and its timelines.
- 11 per cent of farms under audit have LMIAs being held or refused due to the audit. •
- These LMIAs are being held for 4 months with some audits taking as long as 12 months. ٠

The delays and lack of transparency in the audit process jeopardize Canadian farms, Canadian farm workers, foreign workers and their families. The farms with LMIAs held due to audits employ 2,315 Canadian farm workers in rural Ontario and Atlantic communities whose jobs are being directly affected because the farms are unable to line up the seasonal workers required for spring. The situation is also directly affecting jobs for 2,390 long-term SAWP and Agricultural Stream employees who work in Canada to support their families in poor countries. The benefits from the SAWP help the "off-shore" seasonal workers build homes and educate their children. This research has been documented by the Inter-American Institute for Cooperation on Agriculture (IICA)¹⁷. IICA is an international group that supports the sustainable development of agriculture through cooperation between governments in the Americas and



Canada. There is also a larger cumulative impact for upstream and downstream jobs in these rural Canadian communities.

Many producers explained that auditors are not taking into consideration the seasonality of their farm businesses. Many of the audits are being conducted during their peak harvest periods. This is causing severe stress and anxiety to many farmers participating in the program. One farmer said, "I was audited during the harvest season. This is not the extra work and emotional stress I needed during harvest. I nearly snapped." Producers reported serious critical impacts for their farms, families, and also their mental well-being. **Survey respondents commented:**

- "I worked around the clock and now have mental and physical illness from working with minimal sleep for 4 months. Our farm pays over \$100,000 in source deductions and probably another \$30,000 for WSIB. I treat my workers like family I felt like it was a kick in my face to demand all my records for this audit during the peak harvest season. I lost approximately \$40,000 worth of squash because my energy was focused on "compliance." Mother Nature's deadline passed with a frosty night. After 3 weeks of the audit being initiated I was informed that I could get an extension. I wasn't told this at the beginning. I'm frankly very displeased with the state of affairs around this waste of money and undue stress during a very stressful time (harvest)."
- "We were not advised we were under audit until we put in an LMIA for a replacement worker and it didn't come and didn't come and then F.A.R.M.S looked into it and advised us that we were under audit and our LMIA's were being held. It was still a couple of weeks after that before Service Canada notified us we were under audit. Our farm could lose millions and there is a good possibility we will have to shut it down. Emotional state is terrible and my spouse could probably go into deep depression or kill themselves. Our family eats and sleeps to farm."
- "In 2016, we were audited. The audit took over 5 months to complete. We ended up having a net loss of profit of \$80,000.00 due to the audit. We almost lost everything financially, even our sanity over not having workers. We had to dismiss 2 Canadian jobs as a result and restructure our company. It took a whole year to recover financially and still having issues financially because of the audit. The SAWP workers we rehire every year, lost around \$5,000 to \$10,000 each in income. But they gained \$50 each in accounting inconsistency that was found in the audit process."
- "I understand the need for the audit and agree with the principles but asking for sensitive information when farmers are the busiest is not considerate and is a sign of disrespect especially when it pertains to events in the past and appear to have no urgency. The information was submitted by mid-September (it was shameful how much paper had to be copied and sent for 10 workers). It would definitely be cheaper to have the auditor come out and review the documents on site. As of this date, I have still not heard anything about the audit results."
- "It affected my harvest this year and without a work force I will not be doing any more expansions and I may be decreasing my farm size. All the planning in the world will not get the crop harvested if there is no help to harvest. My busiest time of year is during harvest and that is when the audit process happens. Ridiculous!!!"

"The Integrity Service Branch selected my farm for an audit and the process took longer than 12 months to complete the review which automatically added my farm to the non-compliance list. There were no warnings or communication or other information from the Integrity Branch, so I did not know there was anything wrong or that I had anything to fear. It took 10 days to find out why my LMIA application for harvest workers was being held up from processing. By that time the damage was done it was not able to be reversed. It did create economic loss for me. The information that was asked of me and submitted to the Integrity Service Branch was done on time so there were no delays on my part. My farm also passed the Integrity Review process."

Service Canada Communication Issues

An overwhelming majority of survey respondents (96 per cent) explained that they rely on F.A.R.M.S. for current information regarding the SAWP and Agricultural Stream programs. The other 4 per cent get their information from other sources such as commodity groups, calls to Service Canada and some use both the ESDC and F.A.R.M.S. websites to find information. Comments about F.A.R.M.S. included that they are "excellent to work with and work tirelessly for the farmers." Producers participating in this survey go to the F.A.R.M.S. website first to find information and use the F.A.R.M.S. employer handbook.

However, survey respondents reported that Service Canada's communication is deteriorating, with many issues being reported in the open comments section of the survey. **Over 15 per cent of respondents** reported that they received contradictory information from Service Canada in 2017 in the following areas:

- Audits: Farmers reported that they are receiving different timelines for the integrity audits. One farmer reported that he was sent a package from Integrity Services Branch regarding 63 TFWs that were to be audited. He called and found out this was a mistake. They resent the package saying that 1 TFW was under audit but it was a name of someone that never worked on his farm. He has not heard back from the Integrity Service Branch since he informed them about this second mistake.
- Changing LMIA Advertising Requirement and Other Rule Changes: Survey participants explained that forms changing mid-season and halfway through their LMIA application is "not conducive to a smoothly run program and does not benefit the farmers of this country." Answers to the LMIA questions are accepted for 2 3 months and then on the next application they are denied. They also explained that the requirements change drastically from year to year and often mid-LMIA. For example, in Nova Scotia, they require a yearly Foreign Worker Recruitment Employer Registration Certificate. The farm's certificate is valid for a full year, from January to January. However, last year, Service Canada officers would not process the LMIA in November/December unless the farmer renewed the certificate before it expired, while the previous year, it was accepted.
- Interpretation Issues: Respondents indicated that each LMIA appears to be reviewed by different people at Service Canada and that each individual conducting the review process seems to interpret the guidelines differently, causing inconsistencies in the process. One respondent wrote that each officer "guides me differently and then they say it is not done correctly and it delays my process." Several producers stated that the primary definition of agriculture was being



questioned. Service Canada officers questioned primary agriculture operation activities, not understanding that modern farm operations today are spread over several municipalities and townships. Service Canada officers also questioned, "Why are these programs in place?" One producer stated that Service Canada officers "do not have a good understanding of the SAWP or Agricultural Stream program and so they give contradictory information," a sentiment echoed by many other respondents.

• Job Bank Advertising Issues: Producers report that they will use previously approved advertising in Job Bank advertisements only to have another Service Canada officer decline the same advertisement. The Job Bank expiry date not allowing ongoing advertising is one of the biggest issues, as previously indicated.

Recommendations to Improve Administration of LMIAs

Survey respondents provided recommendations to improve the Government of Canada Job Bank. They also provided recommendations to improve overall administration by ESDC and Service Canada for the TFWP's primary agriculture streams (SAWP and Agricultural Steam).

Respondents' recommendations to improve the effectiveness of the Government of Canada Job Bank and ensure greater success for their LMIA applications:

- An ongoing advertisement option supporting ongoing recruitment and/or a notification system to warn employers before the advertisement expires.
- A filter to screen out foreign applicants who do not live in Canada or do not have a valid work permits or access to work in the TFWP.
- A way to filter out applicants who have less than 3 criteria matched to the job. These applicants are not viable matches and clutter the employers' accounts.
- A space where employers can add comments, enabling them to explain the requirements of the agricultural job in greater detail.

Respondents' recommendations to improve overall administration of the SAWP and the other TFWP streams:

- Orientation training of the SAWP workers prior to arrival at the farm.
- Faster turn-around approval times for transfer requests.
- Consistent advertisement requirements that don't change so often.
- A consistent LMIA application form that doesn't change so often. (Respondents pointed out that the form needs to be very clear because Service Canada's personal interpretation of program guidelines is creating uncertainty in the LMIA process.)
- A pre-approved checklist of the information the farm employer is expected to provide with the LMIA.
- An information package, with complete requirements, produced by Service Canada prior to the beginning of the application season.
- Firm timelines so farmers can have a business plan rather than emergency new requirements.
- A better summary of the Agricultural Stream program.

• A Service Canada staff member who is available to answer questions by email or phone.

Conclusion

The SAWP and Agricultural Stream programs were created to serve certain needs and meet defined objectives. To ensure the success of these programs, it is important to collect stakeholder input and evaluate whether these needs and objectives are met. As part of this research, stakeholders have told us some very sobering and stark information about the administration of LMIAs and other related issues to the Job Bank and farm audits. The problems producers encounter while trying to fill their vacancies are working against the sustainability and growth of the agriculture sector in Canada.

The information collected through the survey demonstrates serious but correctable flaws that are currently restricting access to the SAWP and Agriculture Stream. Many respondents said their business would suffer catastrophic losses without the benefit of the SAWP, while others said they would be forced to cease farming operations.

Producers also indicated that the Job Bank, though well-intentioned, does not work well in practice because it does not allow them to specify the agricultural experience or skills required by the job or provide detailed descriptions of the work involved. It also does not reflect the reality of hiring farm workers well in advance for a crop season.

Respondents reported critical issues with government audits that not only increase the stress of their daily lives, but also impact their ability to do their primary job of farming. This, in turn, is jeopardizing their operations and putting many Canadian jobs at risk.

Finally, respondents to the survey indicated that the rules at Service Canada seem to constantly change and involve differing interpretations by Service Canada officers who cannot provide consistent advice or direction. If farmers were only reporting administration issues that resulted in minor inconveniences, it would still necessitate an evaluation of the responses with a view to finding solutions to improve the programs.

However, the magnitude of the issues reported, and the devastating impact they have had on the farmers and their operations, suggest a far greater problem. The fact that respondents indicated serious impacts of these issues to their health (including thoughts of suicide) and spoke of seeing their livelihoods terminated due to the challenges of accessing labour for their farms indicates the seriousness of this situation and clarifies how critical it is to industry to ensure the process is improved in a timely manner so that producers have a successful 2018 crop season.

Industry respondents recognize that government is adept at designing solutions and delivering assistance programs in a fair and professional manner. However, they believe those who receive the service should be prioritized to achieve a functional program that is transparent for all parties. Stakeholders reported they support an integrity approach to the TFWP and seek to work in partnership with the federal government to improve programming.



Appendices

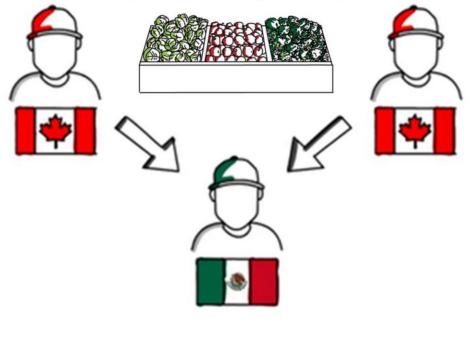


Seasonal Job Multiplier Infographic

Seasonal

2 jobs for Canadians are created

for every worker employed through SAWP



[VIDEO] Watch the video communicating SAWP benefits

Research conducted by the Agri-Food Economic Systems



Seasonal Agriculture Worker Program Integrity Fact Sheet

SOWING GROWTH WITH CANADA'S SEASONAL AGRICULTURE WORKER PROGRAM **50 Years of Integrity**

CANADIAN GROWERS VALUE AND APPRECIATE SEASONAL AGRICULTURE WORKERS: The Seasonal Agriculture Worker Program (SAWP) is an effective labour mobility program celebrating 50 successful years of collaboration with the Canadian government, workers and their respective international governments. Employees participating in SAWP complete a season of work in Canada and then return to their home countries. Built on bilateral agreements with Mexico and Caribbean countries, SAWP includes carefully



constructed rules protecting Canada's seasonal workers. The program includes formal signed contracts that outline expectations of growers and benefits to seasonal employees. Local Liaison Officers are supplied by home countries and they work with Canadian officials to care for SAWP employees while they are in Canada. Internationally, the SAWP has won many awards as a successful labour mobility model. The program has been developed in cooperation and is reviewed annually with Canadian authorities, growers and participating countries working together on program improvements to safeguard labour rights for seasonal employees.

SAWP WORKERS HELP FILL THE AGRICULTURE LABOUR SHORTAGE: Research conducted by the Canadian Agricultural Human Resource Council (CAHRC) shows a critical gap between the demand for workers and the supply of available workers. This gap has doubled in the past 10 years to approximately 60,000 workers. By 2025, the labour gap is expected to grow to 114,000 workers. The job vacancy rate for the industry is higher than any other industry in Canada, at 7 per cent. This is resulting in \$1.5-billion in lost sales. SAWP helps to fill this critical labour gap. Feedback received in consultations with producers suggests that there would be no horticulture production in Canada without the SAWP. When Canadians are not available, international workers fill vacancies and help mitigate the risks associated with this labour gap. According to the Agri-Food Economic Systems report, every foreign worker participating in the SAWP creates 2 additional Canadian jobs.

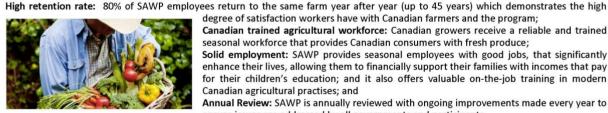
SAWP BENEFITS CANADA AND WORKER FAMILIES

The SAWP was created 50 years ago to address farmers unique workforce needs which include: rural location, handling of live plants and animals, and a high degree of seasonality. Seasonal paid workers make up 53% of Canada's paid agricultural workforce. Canadian

farmers spend significant time and effort to recruit and retain Canadian workers, however seasonal farm work does not provide permanent year round jobs for Canadians and these positions are difficult to fill. Seasonal work is necessary and an integral part of our Canadian food system, providing safe and sustainable Canadian grown fruit, vegetables, meat and honey for grocery shelves here in Canada and abroad. This program benefits Canadians and farmers. It is also an incredibly important program for international workers, providing them with an income to support a better standard of living and education for themselves and their families.



WHY DOES SAWP WORK SO WELL? SAWP GIVES OPPORTUNITIES TO GROWERS, WORKERS AND THEIR FAMILIES:



degree of satisfaction workers have with Canadian farmers and the program; Canadian trained agricultural workforce: Canadian growers receive a reliable and trained seasonal workforce that provides Canadian consumers with fresh produce;

Solid employment: SAWP provides seasonal employees with good jobs, that significantly enhance their lives, allowing them to financially support their families with incomes that pay for their children's education; and it also offers valuable on-the-job training in modern Canadian agricultural practises; and

Annual Review: SAWP is annually reviewed with ongoing improvements made every year to ensure issues are addressed by all governments and participants.

WORKER'S RIGHTS: CAREFULLY CONSTRUCTED RULES TO PROTECT SAWP EMPLOYEES:

- Housing: SAWP housing is provided by farmers and is annually inspected by local certified health inspectors;
- Health Care & Workers' Compensation: Ontario SAWP workers receive Health Insurance Plan & Workers' Compensation benefits from day 1;
- Wages: The Canadian Government determines and regulates prevailing wages for seasonal workers;
- International Governments Support Workers: Participating SAWP countries employ liaison officers in Canada who provide support to SAWP employees on a number of issues: non-workplace personal medical care, Worker Compensation issues, and personal issues;
- Farm Integrity Inspections: Canadian growers who participate in the SAWP program are subject to integrity inspections at any time chosen by the Federal Government's Integrity Services Department. If a grower breaks the rules, the employer is penalized, fined or banned from the program.

HIRING CANADIAN WORKERS: Canadian growers recruit and hire Canadian workers first, however, there are unique workforce challenges:

- Producers are located in rural areas;
- Many jobs are SEASONAL and are not full-time, year round positions that most Canadians are seeking; and
- Critical, time sensitive seasonal crop cycles, weather conditions, and the handling of live plants and animals mean growers
 need seasonal employees during peak periods to avoid devastating losses.

CANADIAN GROWERS COMPETITIVENESS FAST FACTS



Seasonality: The SAWP is an essential part of the success of the agriculture industry that fills short-term, seasonal positions. 53% of agricultural paid jobs are seasonal;

Family Farm Competiveness: Seasonal programming for labour supports sustainability and strengthens competitiveness of family farms, restricting access to seasonal workers could result in fewer family farms;

Canadian Grown Produce: Seasonal agriculture workers support the availability of Canadian grown and local fresh vegetables, fruit, honey and other commodities; and

Canadian Job Creation: every foreign worker in the Seasonal Ag Worker Program creates 2 additional Canadian jobs.

FACTORS AFFECTING THE COMPETIVENESS OF GROWERS AND PROCESSORS:

- Agriculture and Agri-Food is a High Growth Industry: Canadian farmers feed the world, and demand for Canadian food is growing. Farmers need a secure workforce to allow Canada to participate in new trade agreements and to remain 5th largest Agri-food exporter in the world.
- U.S. Undocumented Farm Workers: Canadian growers are competing directly with unregulated American wages related to illegal workers in the United States. Unauthorized U.S. immigrants represent the largest share of the total work force in farming occupations in most states, according to data from the Pew Research Center, a nonpartisan think tank based in Washington, D.C. The American Farm Bureau estimates there are 1.5 to 2 million hired farmworkers in the US and that 50 to 70 per cent of them are illegal.
- Canada is losing its Agri-Food Primary Processing: The Globe and Mail reported in January 2016 that food prices are outpacing
 inflation; rising 1.4% to 3.7%. One of the things increasing Canadian consumer food costs is that Canada is becoming increasingly
 reliant on imported food, losing 143 food manufacturing facilities and only building 63 between 2006 and 2014 according to the Ivey
 School of Business.

SEASONAL AGRICULTURE WORKER PROGRAM RESEARCH

When Canadian workers are unavailable, international agriculture workers are needed. These workers help to sustain farm businesses and create permanent full-time jobs for Canadians. According to *The Economic Impact of the*

Seasonal Agricultural Worker Program in the Ontario Horticulture Sector by A. Mussell from Agri-Food Economic Systems, every foreign worker in the SAWP creates 2 additional Canadian jobs. When the industry is short workers, Canadian jobs are at risk. Dr. Sara Mann from the University of Guelph and Dr. M. H. Budworth from York University have conducted extensive research on SAWP, including Overcoming Labour Challenges in the Agri-Food Sector and Seasonal Agricultural Worker Program: Understanding the Social Impact.





"The SAWP is built on shared interests between nations. Canada benefits from access to a labour force that fills an important gap in a key industry. The home nations benefit from access to employment for their nationals as well as economic gain through remittances, money sent back to the family in the home country, and salary dollars that are spent in the home country – a boost to both economies." (Budworth & Mann, 2015).

The Canadian Agricultural Human Resource Council and the Conference Board of Canada have also completed research clarifying labour shortages in the industry and documenting the positive impacts of SAWP to alleviate risks due to job vacancies.

AGRICULTURE AND AGRI-FOOD LABOUR TASK FORCE: Canada's Agriculture and Agri-Food Labour Task Force recommends that SAWP be used as a programming model for addressing critical labour issues. The program is demand driven and includes the timely processing of paperwork. The LTF recommends that no changes be made to the SAWP.

HUMA TEMPORARY FOREIGN WORKER PROGRAM REPORT: The Parliamentary Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA) made no recommendations for any changes to the SAWP.



SAWP CELEBRATES 50TH ANNIVERSARY



An important part of the Seasonal Agriculture Worker Program are the bilateral discussions that take place every year to continuously improve SAWP for seasonal employees. SAWP's 50th Anniversary was celebrated this year and highlighted the integrity and proud history of the program. This long-standing, special Canadian program provides real value to the lives of the seasonal workers and their families. Saint Lucia's Minister of Labour was one of the many dignitaries who participated in the ceremony. Below is his perspective on the continued relevance of the program and its meaningfulness to the lives of those involved.

Canada Caribbean Seasonal Agricultural Workers Programme: A Relevant Perspective By Hon. Stephenson King, Minister for Labour, Saint Lucia

The Canada Caribbean Seasonal Agricultural Workers Programme; now in its fiftieth year, has transformed families, changed economic fortunes, and built strong societies in the participating countries throughout the Caribbean region.

In most instances, the programme has eliminated among its people, the culture of social dependency and replaced it with the science of economic independence. Many citizens/families who were hopeless after the demise of the sugar and banana industries, are now optimistic by the opportunities offered by the programme, which has provided social and economic stability over the last fifty years.

Many who have benefitted from the programme have provided stability to their families, purchased property, built their homes, educated their children, and equipped society with first class professionals, thus providing management capacity to our small island states.

Today; more than ever before, at a time when friendly "First World Governments" are diminishing the value of diplomatic and economic cooperation in a changing global economic environment, Canada is considered the final bastion in defence of our Caribbean citizenry, whose only wish is to capitalize on the opportunities through the SAWP and venture into a "World of Opportunities" that can only transform our societies into true nations of independence.



1 CAHRC AgriLMI 2014 Canadian Agricultural workforce (infographic)

- ² <u>https://www.hortcouncil.ca/en/about-us/horticulture-stats/</u>
- https://www.hortcouncil.ca/en/about-us/horticulture-stats/
- https://www.fin.gc.ca/pub/ltefp-peblt/report-rapport-eng.asp
- https://www.budget.gc.ca/aceg-ccce/pdf/key-sectors-secteurs-cles-eng.pdf
- https://www.budget.gc.ca/2017/docs/plan/budget-2017-en.pdf
- 7 CAHRC AgriLMI Agriculture 2025: How the Sector's Labour Challenges Will Shape Its Future
- ³ https://www.hortcouncil.ca/en/about-us/horticulture-stats/
- ⁹ https://cahrc-ccrha.ca/programs-services/agrilmi/commodity-data
- ¹⁰ https://www.fin.gc.ca/pub/ltefp-peblt/report-rapport-eng.asp
- ¹¹ https://www.hortcouncil.ca/en/about-us/horticulture-stats/
- ¹² https://sencanada.ca/en/Content/Sen/Committee/421/NFFN/42ev-53565-e
- 13 ibid

- ¹⁵ https://www.canada.ca/en/employment-social-development/services/foreign-workers/agricultural/seasonal-agricultural/recruitment.html
- ^bhttps://www.canada.ca/en/employment-social-development/services/foreign-workers/agricultural/seasonal-agricultural/recruitment.html
- 17 https://cahrc-ccrha.ca/sites/default/files/Emerging-Issues-Research/4-Seasonal%20Agricultural%20Worker%20Release%20and%20Report.pdf

⁴ <u>https://cahrc-ccrha.ca/sites/default/files/2015-04-EconomicImpactSAWPHorticulture-Apr-15.pdf</u>