

May 26, 2023

regulation-reglementation@tbs-sct.gc.ca

RE: Regulatory sandboxes and incorporation by reference consultation

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for producers on issues that affect agriculture. KAP represents and promotes the interests of 4,400 producers and 19 commodity associations. KAP is pleased to provide feedback to the Government of Canada regarding its proposed expansion of the application of regulatory sandboxes and incorporation by reference.

KAP is supportive of changes that would reduce red tape, create efficiencies and speed up the regulatory process within government. The broader application of incorporation by reference (IBR) has the opportunity to improve the current regulatory process. The application of IBR may be particularly beneficial to time sensitive issues requiring a quick regulatory response.

KAP believes that certain internal documents that are incorporated by reference do not require stakeholder consultation. This would include corrections to errors, template formats and administrative changes. However, we recommend that other changes involve online stakeholder engagement to ensure transparency while protecting the public interest. Additionally, KAP believes substantive changes to regulations must go through the Governor in Council to ensure a thorough analysis is applied and that all stakeholder viewpoints are considered.

KAP supports the concept of a regulatory sandbox that would allow a regulatory approach to be tested in a controlled environment that would inform future regulatory decision making. It remains unclear how applicable the use of a regulatory sandbox may apply to the agriculture sector and certain sectors may be more reliant on a regulatory sandbox than others. Nevertheless, KAP is supportive of the proposed criteria listed on the government's consultation webpage that would determine the appropriateness and applicability of the regulatory sandbox.

Thank you for the opportunity to provide feedback on the Regulatory Modernization Consultation. If you have any questions about this submission, please contact KAP Policy Manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,



Jill Verwey
President, Keystone Agricultural Producers Inc.