



Canadian Association  
Propane canadienne  
Association du propane

February 28, 2025

The Competition Bureau of Canada

Via email: [environmentalclaims-declarationsenvironnementales@cb-bc.gc.ca](mailto:environmentalclaims-declarationsenvironnementales@cb-bc.gc.ca)

**Re: Competition Bureau draft guidance regarding Competition Act's new greenwashing provisions**

The Canadian Propane Association (CPA) is the national association representing the Canadian propane industry. With members across Canada, the CPA represents every segment of a growing, multi-billion-dollar propane industry that impacts the livelihood of tens of thousands of Canadians. Many of the CPA members are small and medium sized companies, many of whom are family-owned generational operations. CPA members produce, transport, retail and support the propane sector in every community across Canada and form an integral part of Canada's energy future. CPA welcomes the opportunity to provide feedback on the guidance proposed on the greenwashing provisions on behalf of our 400 members.

The recent amendments to the Competition Act, particularly those governing environmental claims under section 74.01(1), pose a significant threat to small and medium-sized enterprises (SMEs) in Canada, including CPA members. The lack of clear compliance guidance risks the unnecessary suppressing of business communications, obstructing investment, and stifling innovation—particularly for SMEs that lack the legal and financial resources of larger corporations.

Unlike large corporations with resources to navigate the requirements, SMEs will be disproportionately burdened by navigating the uncertainty and by potential compliance costs associated with these proposed changes. The threat of legal repercussions will force many businesses to avoid making environmental or sustainability claims altogether, leading to a competitive disadvantage both domestically and internationally. Worse still, companies in other jurisdictions—operating outside these strict regulatory constraints—will continue to promote their respective initiatives, drawing away investment and customers from Canadian businesses. The amendments risk handicapping homegrown enterprises while giving competitors operating in other jurisdictions free rein.

Additionally, these provisions will undermine collaboration between businesses, government, and non-profits that rely on clear and open communication regarding sustainability goals. Small businesses depend on strategic partnerships and transparent marketing to build trust with consumers and investors. By introducing vague and overly restrictive rules, the amendments create an environment of fear and hesitation, rather than fostering responsible corporate behavior and transparent communications.

These amendments will be particularly crippling for the propane sector, as new pathways that reduce emissions, such as renewable propane and rDME (renewable dimethyl ether), are beginning to see fruition in other jurisdictions. Canada has a critical opportunity to position itself as a leader in the global biofuel sector, but these proposed amendments may further hinder progress at a time when other regions are surging ahead. Companies are constrained and cannot openly communicate advancements in renewable propane and other low-carbon alternatives, Canadian companies risk falling behind in an emerging global market. This not only jeopardizes investment and innovation in the propane sector but also undermines Canada's ability to transition to cleaner energy solutions—a direct contradiction to the country's stated climate and economic goals.

The CPA strongly urges the immediate repeal of all Section 74.01 (1) of the Competition Act amended in 2024. The lack of regulatory clarity poses an untenable burden on SMEs, threatening their ability to innovate, compete, and contribute to Canada's sustainability goals. We have once again jointly signed a letter with other associations, urging for the immediate repeal of these changes.

Thank you for your time and consideration. We look forward to discussing our submission in further detail at your earliest convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shannon Watt', with a stylized flourish at the end.

Shannon Watt  
President & CEO  
Canadian Propane Association