



CANADA
GROCERY
CODE

Office of the Grocery Sector Code of Conduct

Spring Report 2026

COVERAGE PERIOD: JANUARY 1 – MAY 31, 2026





**CANADA
GROCERY
CODE**

© 2026 The Office of the Grocery Sector Code of Conduct (OGSCC). All rights reserved.

Any enquiries regarding this publication should be sent to us at:

Office of the Grocery Sector Code of Conduct (OGSCC)

1 Rideau Street
7th & 8th Floor
Ottawa, ON. K1N 8S7

Table of Contents

Message from the President & Adjudicator	02
1. Early Observations	04
2. Code Compliance	10
2.1 Issue Centre.....	11
2.2 Systemic Issues and Guidance Development.....	13
2.3 Dispute Resolution Management Process (DRMP).....	16
3. Membership	18
3.1 Membership by Class.....	19
3.2 Geographic Distribution.....	21
4. Governance	22
4.1 Board of Directors.....	23
5. Outreach & Education	24
5.1 Activity Summary.....	25
6. Communications	28
6.1 Direct Communications.....	30
6.2 Website and Members' Portal.....	30
6.3 LinkedIn and Media Engagement.....	31
7. Priorities for the Remainder of 2026	32
7.1 Education, Awareness Building and Recruitment.....	33
7.2 Code Compliance Activities.....	34
7.3 Ongoing Governance.....	37
8. Concluding Observations	38



Message from the President & Adjudicator

Since becoming operational in March 2025, the [Office of the Grocery Sector Code of Conduct](#) (OGSCC or the “Office”) has focused on establishing the governance, operational, and administrative foundations necessary to support implementation of the [Canada Grocery Code](#) (the “Code”). Key activities during this period included:

- establishment of operational processes;
- launch of the OGSCC website and Members’ Portal;
- development of reporting and intake mechanisms;
- finalization of the OGSCC [By-Laws](#) and [Operating Rules](#);
- development of the [Dispute Resolution Management Process](#) (DRMP);
- onboarding of members; and
- outreach and education activities across the grocery supply chain.

Together, these efforts established the framework necessary to support full implementation of the Code on January 1, 2026.

The Office is pleased to present this first public report, which provides an overview of the Office’s activities and observations during the period from January 1 to May 31, 2026; the first five months following full implementation of the Code.

The OGSCC is required to publish an annual public report, with the first expected to be released in early 2027. In addition to its annual reporting obligations, the Office may also publish interim public reports from time to time to provide members and stakeholders with updates regarding implementation activities, operational developments, emerging themes, and other matters relating to administration of the Code.

As 2026 represents the first year of full implementation of the Code, the Office determined that it would publish two interim reports during the year, including this report and a second report anticipated in Fall 2026.

The decision to issue interim reports reflects the OGSCC’s commitment to providing members and stakeholders with greater insight into implementation activities, emerging themes, and the Office’s priorities during the first year of full implementation. The Office also recognizes the importance of ensuring that members who raise concerns through the OGSCC have broader visibility into how their input is helping to inform the Office’s activities and priorities across the sector, even where individual matters may not result in direct action or intervention.

While it remains early in the implementation journey, the experiences and observations gathered to date are already helping to shape the Office’s priorities and approach. This report provides an overview of activities to date and early observations arising from this period, including:

- early implementation observations;
- Code compliance activities;
- member growth;
- governance developments;
- outreach and education activities;
- communications activities; and
- operational priorities for the remainder of 2026.



Karen Proud, President and Adjudicator of the OGSCC



1. Early Observations

As the OGSCC moves through its first full year of operations, several early observations have emerged regarding some of the opportunities and challenges associated with implementation of the Code across the grocery supply chain. The observations outlined below are intended to identify emerging implementation themes and experiences rather than draw definitive conclusions regarding long-term outcomes.

Reluctance to Raise Concerns with Designated Code Representatives

As set out in Section 5.1 of the Code, member organisations are required to designate a representative empowered to address matters related to the Code. One of the most significant observations to date is that members appear reluctant to raise Code-related issues or concerns with their commercial counterparts. While support for the objectives of the Code remains strong across much of the sector, the Office continues to observe reluctance among some parties to escalate concerns directly to the designated Code Representatives within counterpart organizations, even in situations where concerns may relate to matters that could be resolved directly between parties.

This reluctance has been observed not only in the context of suppliers raising issues with large retailers, but also among independent retailers raising concerns with suppliers.

Where reasons have been provided, the concern most frequently identified by members relates to the potential impact that raising issues may have on ongoing commercial relationships. In particular, some members have expressed concerns regarding possible retribution, negative commercial consequences, or damage to important business relationships, even where the Code specifically encourages direct engagement between parties through designated Code Representatives.

This observation is significant because the Code places emphasis on direct engagement between parties as a means of addressing concerns at the earliest possible stage. Designated Code Representatives are intended to serve as accessible points of contact for Code-related discussions and, where appropriate, facilitate resolution of concerns before they escalate into broader disputes.

The Office recognizes that not all issues can or should be resolved directly between parties. However, in many situations, early discussion, clarification, or engagement may help address concerns more efficiently and support stronger commercial relationships consistent with the principles and objectives of the Code.

Code Provisions

5.1 All Parties to the Code shall identify and make available, when required, a representative empowered to make decisions on relevant matters, for all issues pertaining to the Code and its administration. This includes points of contact for informal discussion, dispute resolution and overall communication between Parties.



Hesitation to Report Issues to the OGSCC

The Office has also observed hesitation among members regarding reporting issues directly to the OGSCC, even through confidential channels. While confidentiality protections remain a core component of the Office's approach, some members continue to express discomfort regarding bringing issues forward.

The reasons cited are often similar to those expressed in relation to direct engagement with commercial counterparts. In particular, some members have indicated concerns regarding potential retribution or negative commercial consequences should their identity become known, even where information is provided to the OGSCC on a confidential basis. In some cases, members have also expressed uncertainty regarding how information submitted to the OGSCC may be used, particularly given that the Office and its processes remain relatively new and many participants are still developing familiarity with the role and functions of the OGSCC.

The Office has observed that some members appear more comfortable discussing concerns during one-to-one conversations with OGSCC staff than through formal reporting mechanisms. These discussions often focus on broader trends, recurring concerns, or general observations regarding industry practices, rather than detailed information relating to specific incidents or counterparties. While these conversations provide valuable insight into issues affecting the sector, the Office's ability to fully assess concerns and identify patterns may be enhanced where participants are comfortable providing additional detail regarding their experiences.

This is an important issue for the OGSCC because the Office relies significantly on information gathered from members and industry associations to identify emerging themes and potential systemic issues across the sector. Meaningful engagement from industry participants is therefore essential to supporting the Office's broader compliance-support and education mandate.

The Office expects that confidence in these processes will continue to develop over time as members gain greater familiarity with the OGSCC, observe how information is used to inform guidance and operational activities, and become more comfortable with the confidentiality protections available through the Office's reporting and dispute resolution mechanisms.

Lack of Understanding of Agreements

The Office has also observed that, in some cases, members raising Code-related concerns do not appear to have a clear understanding of the terms, processes, or dispute resolution provisions contained within their existing commercial agreements. The Office recognizes that this is not always straightforward, as the terms governing a commercial relationship may be found across a series of documents, including retailer policies, operational guidelines, and other materials that form part of an overall agreement. Nevertheless, this remains an important operational observation, as commercial agreements are foundational to the operation of the Code and many Code provisions rely on, or defer to, the terms established between the parties. Greater familiarity with existing agreements and related operational processes would assist parties in identifying, assessing, and resolving Code-related concerns more effectively.

Ongoing Misconceptions with the OGSCC Confidential Complaints & Issue Reporting

The Office has also observed ongoing misconceptions regarding the role of the OGSCC's confidential complaints and issue-reporting processes. Some members continue to view the Issue Centre as an individual complaint/response mechanism rather than as a broader intelligence-gathering and compliance-support tool.

This distinction is important. The confidential issue-reporting process is intended primarily to support broader intelligence gathering and identification of recurring concerns and potential systemic issues across the sector. Information submitted through the Issue Centre helps the OGSCC better understand the types of issues arising across commercial relationships, identify emerging trends, and inform the Office's education, outreach, and guidance development activities. It is not designed to function as a bilateral dispute resolution or mediation process, and members should not expect that submitting an issue through the Issue Centre will automatically result in direct action or intervention in their specific commercial situation.

At the same time, the Code provides mechanisms for situations where a more formal, bilateral process may be appropriate. In those circumstances, members continue to have access to the DRMP, which remains available for Code-related disputes that fall within the scope of that process.

The Office recognizes that this distinction may not always be immediately apparent, particularly for members who are newer to the Code framework or who may be experiencing a pressing commercial concern and are seeking timely resolution. The OGSCC is committed to ensuring that members have a clear understanding of the tools available to them and how each is intended to function and will continue to prioritize education and outreach efforts aimed at clarifying the role and scope of each process.





Strong Industry Commitment

An encouraging early observation from the first months of full implementation is the strong and broad-based commitment to the Code demonstrated by participants across the grocery supply chain. Through its outreach, engagement, and implementation activities, the Office has consistently encountered support for the objectives and principles of the Code and a shared interest in contributing to its successful implementation.

This commitment has been reflected in the willingness of key industry participants to engage with the OGSCC as implementation of the Code continues to evolve. The Office has established a regular cadence of meetings with large retailers; all of whom have expressed an openness to engage with the OGSCC and participate in ongoing dialogue regarding implementation of the Code. These discussions have helped establish constructive working relationships and foster mutual understanding regarding the role of the Office, creating a foundation for productive dialogue should Code-related issues or implementation challenges arise in the future.

Early Signs of Positive Impacts

The Office has also begun hearing anecdotal reports of positive outcomes in situations where parties have engaged in discussions regarding Code-related concerns. While the number of such examples remains limited at this early stage of implementation, reports received through third parties suggest that, in several instances involving independent retailers and suppliers, the Code has helped frame discussions, facilitate engagement between parties, and support resolution of concerns. Although these observations remain preliminary, they suggest that the Code has the potential to influence behaviours and commercial interactions within certain relationships across the grocery supply chain.

Membership Growth Slowdown

The Office has also observed that, following strong initial registration and onboarding during the implementation period, membership growth has begun to moderate. This trend may reflect that many larger and early-adopter organizations have already joined the OGSCC, while organizations that have not yet registered may require more targeted outreach, engagement, and education regarding the practical operation and value of the Code.

Feedback received by the Office suggests that there is no single reason why some organizations have not yet joined the OGSCC. In some cases, non-participation appears to be driven by limited awareness or understanding of the Code and the role of the OGSCC. In others, the Office has encountered misconceptions regarding membership requirements, fees, or the practical implications of participation.

The Office has also heard varying degrees of skepticism regarding the value of the Code, particularly given its voluntary nature. In addition, some organizations have expressed concerns that joining the OGSCC could be perceived by business partners as an indication that they are experiencing issues within their commercial relationships. While these perspectives are not universal, they highlight the continued importance of education, outreach, and awareness-building efforts as implementation of the Code continues to mature.

Summary

Taken together, these early observations highlight both the opportunities and challenges associated with implementation of the Code during its first months of operation. They suggest that, while confidence in the Code and the OGSCC's processes continues to develop, many participants are still becoming familiar with the practical operation of the framework, the role of designated Code Representatives, and the mechanisms available to raise and resolve concerns. At the same time, the Office has observed strong industry support for the objectives of the Code, constructive engagement from participants across the supply chain, and encouraging early indications that the framework has the potential to support productive dialogue and resolution of concerns between parties.

The Office expects these dynamics to continue evolving as members gain greater operational experience under the Code and as familiarity with the OGSCC's role and processes continues to mature across the sector.





2. Code Compliance

Supporting implementation of the Code and promoting compliance with its principles and provisions is a core function of the OGSCC and the Office’s primary operational priority.

Since membership first opened in July 2025, the Office has:

- monitored emerging issues across the sector;
- supported awareness and understanding of Code obligations;
- gathered information regarding industry practices and concerns; and
- engaged with members regarding potential Code-related issues.

Although the Code only came into full effect on January 1, 2026, the Office had already begun receiving implementation-related observations and Code-related concerns from members throughout the latter half of 2025 as organizations transitioned into the new Code environment. The following section provides an overview of the Office’s Code compliance-related activities and operational statistics during the reporting period.

The OGSCC has established two primary pathways through which members may raise Code-related concerns or issues with the Office, the confidential Issue Centre and the formal DRMP.

The Issue Centre supports:

- ongoing intelligence gathering;
- identification of emerging trends and systemic concerns; and
- broader compliance-support activities across the sector.

The DRMP provides members with access to a structured bilateral dispute resolution mechanism for Code-related disputes that fall within the scope of that process.

2.1 Issue Centre

The Issue Centre has been available to members in the Members’ Portal since July 2025.

As a relatively new resource introduced alongside implementation of the Code, the Issue Centre continues to gain visibility and familiarity across the sector. As mentioned previously, the OGSCC has observed that some industry participants remain hesitant to report concerns through the Issue Centre due to concerns regarding confidentiality and potential impacts on commercial relationships.

In recognition of these concerns, in May 2026, the OGSCC implemented an enhancement to the Issue Centre that allows members to submit issues to the OGSCC anonymously. While anonymous reporting may limit the Office’s ability to seek follow-up information in some circumstances, the additional option is intended to support greater comfort and participation in the issue-reporting process.

Given its newness and concerns about its use, the relatively low volume of submissions received through the Issue Centre during this initial implementation phase is not unexpected. The Office anticipates that use of the Issue Centre will increase over time as members become more familiar with the resources available through the OGSCC, gain trust in the confidentiality protections supporting those processes, and become aware of additional reporting options, including anonymous issue reporting.



14

issue submissions received between July 2025 and May 31, 2026.

- 9 issues were reported within this reporting period; and
- 5 issues were reported between July and December 2025;

10

issues involved supplier concerns regarding retailers;

3

issues involved retailer concerns regarding suppliers;

1

issue involved concerns regarding other parties in the supply chain and, as a result, was not covered by the Code; and

The Code provisions most frequently referenced in submissions were sections 1.1 (obligation to negotiate with one another in good faith), 1.3 and 1.4 (unilateral changes to agreements), 3.1 (payments) and 3.4 (charges and deductions), and 1.4 (unilateral changes to agreements), 2.5 (designing agreements to work around the Code), 3.1 (payments) and 3.4 (charges and deductions).

Issue Centre at a Glance

Aggregate Overview of Issues

While the overall number of submissions remains modest, the issues received nevertheless provide useful insight into the commercial practices and operational issues currently generating concern among members.

The most common theme identified through issue submissions involved concerns related to unilateral changes to commercial arrangements or insufficient notice regarding contractual changes. These submissions are frequently related to:

- pricing;
- promotional arrangements; and
- operational concerns involving negotiation, notice, or agreement processes.

A second recurring theme involved administrative fees and deductions. Members raised concerns regarding:

- disputed deductions;
- substantiation for charges; and
- the application of non-compliance fees.

Several submissions also referenced concerns regarding communication and good-faith negotiations between parties.

In particular, members identified situations where they believed notice periods, escalation discussions or negotiations did not align with the principles of transparency and fair dealing contemplated by the Code.

At this stage of implementation, the issues received through the portal are helping the OGSCC better identify areas where additional education, guidance and operational clarity may support more consistent application of the Code across the grocery sector. They also provide a starting point for

broader engagement with members and industry associations, allowing the Office to further explore recurring concerns, gather additional perspectives, and better understand how issues are being experienced across the supply chain.

2.2 Systemic Issues and Guidance Development

A significant role of the OGSCC is to maintain ongoing dialogue with members and industry associations to better understand the systemic and recurring Code-related issues affecting the grocery supply chain.

Throughout the reporting period, the OGSCC engaged with members and industry associations regarding implementation-related concerns and operational practices arising under the Code. Two areas where the OGSCC heard concerns during the reporting period involved “click-to-accept” agreement processes and unilateral amendment practices.

In response to recurring questions and concerns related to these practices, the OGSCC launched a Request for Information (RFI) process on March 2, 2026, seeking member input.

A questionnaire was distributed to all OGSCC members in both English and French and remained open until March 31, 2026. Responses were collected anonymously to encourage candid feedback and participation.

62

responses received;

37%

member participation across all classes of members;

82%

of respondents reported encountering “click-to-accept” mechanisms; and

73%

reported encountering unilateral amendment clauses either frequently or occasionally.

RFI Results at a Glance



What We Heard

- **Transparency regarding proposed changes:** Respondents noted concerns regarding the level of information provided when amendments or new terms are introduced, including whether the nature and practical implications of changes are sufficiently explained.
- **Notice periods before amendments take effect:** Participants raised questions regarding whether sufficient notice is provided to allow organizations adequate time to assess, review, and operationalize proposed changes.
- **Opportunity to review and discuss changes:** Some respondents raised concerns regarding whether parties are provided with a meaningful opportunity to engage in discussion and negotiation regarding proposed amendments prior to acceptance.
- **Practical implications of declining amended terms:** Some participants raised questions regarding the consequences of declining amended terms, particularly where acceptance may be linked to ongoing access to systems or continuation of business arrangements.
- **Clarity regarding when acceptance occurs:** Respondents highlighted the importance of clearly understanding how and when acceptance is deemed to occur within electronic processes.

Emerging Themes from the RFI

Feedback received through the RFI highlighted differing perspectives across the supply chain regarding the operational use and commercial impact of “click-to-accept” processes and unilateral amendment clauses.

Many respondents indicated that electronic acceptance mechanisms and standardized amendment processes are commonly used in high-volume commercial environments and may support operational efficiency and administrative consistency. At the same time, respondents identified several recurring considerations relating to how these practices are implemented and experienced in commercial relationships.

While perspectives varied depending on the role and operational realities of the responding organization, the feedback provided valuable insight into how these practices are currently being used across the grocery supply chain and informed subsequent OGSCC guidance development activities.

Guidance Documents Issued by the OGSCC

Following analysis of the information received through the RFI, the OGSCC published two guidance documents on May 6, 2026.

Click-to-Accept Practices:

Focused on sections 1.1, 1.2 and 2.4 of the Code, the [Click-to-Accept Practices and Agreement Formation](#) guidance document clarifies the OGSCC’s expectations regarding the use of electronic “click-to-accept” processes in commercial agreements.

The guidance recognizes that these mechanisms may support operational efficiency. At the same time, it emphasizes that agreement formation under the Code requires a practical and meaningful opportunity for parties to review and discuss proposed terms as part of a negotiation process, particularly where acceptance is tied to continued access to purchasing systems or ongoing business operations.

The guidance also clarifies that the Code does not prohibit the use of “click-to-accept” mechanisms, but that such processes should be implemented in a manner consistent with mutual consent, transparency, good faith engagement and fair dealing under the Code.

Code Provisions

1.1. Parties to the Code have an obligation to negotiate with one another in Good Faith and conduct business in the spirit of fair and ethical dealing.

1.2. If two or more Parties wish to enter into an Agreement, such Parties will have an obligation to negotiate and conclude Agreements by mutual consent.

2.4. No Party who conducts or intends to conduct business with another Party shall purposely avoid or refuse entering into an Agreement (particularly a written Agreement) with that other Party.

Unilateral Amendments:

The [Unilateral Amendments Permitted by Agreement](#) guidance document provides clarification regarding the application of sections 1.1, 1.2, 1.4 and 1.5 of the Code in situations where commercial agreements permit one party to make unilateral amendments. The guidance recognizes that unilateral amendment clauses may serve legitimate business purposes. At the same time, the guidance emphasizes the importance of providing reasonable notice, sufficient detail regarding proposed changes and an opportunity for parties to assess and respond to amendments, while also clarifying that the Code does not prohibit unilateral amendment clauses or require mutual agreement for every amendment where such rights exist under an agreement.

The guidance documents do not reinterpret or replace the Code provisions. Rather, they are intended to support greater clarity and consistency regarding the application of the Code. The guidance documents explain how commercial practices are expected to be applied and assessed in light of the provisions of the Code.

The Office expects guidance-development activities to continue evolving as implementation experience under the Code matures and additional systemic issues emerge across the sector.

Code Provisions

1.4. Parties may prospectively or retroactively alter an Agreement, provided that the Agreement provides for so doing or such change is mutually agreed to.

1.5. Parties to the Code shall not undertake punitive or vexatious acts (or threaten same) against Parties for exercising rights provided for under the Code.



2.3 Dispute Resolution Management Process (DRMP)

The DRMP came into effect on January 1, 2026, and is the formal dispute resolution framework established under the Code and administered by the OGSCC.

The DRMP provides members with access to impartial dispute resolution processes relating to the application of the Code, including mediation and adjudication where appropriate. The DRMP applies only in situations where both parties were OGSCC members at the time of the events giving rise to the dispute.

During the first five months of 2026, the OGSCC focused on operationalizing the DRMP to ensure the process was secure, accessible, and prepared to support members should formal disputes arise under the Code.

DRMP Manual Provisions

4.1 (a) Members must begin by contacting the OGSCC to initiate the pre-application step. This preliminary stage is intended for the OGSCC to identify whether the dispute is Code-related, ensure that Members are aware of relevant Code guidance materials, and confirm that the internal resolution steps outlined in section 3.2 have been fully exhausted. This step is informational and does not constitute formal entry into the DRMP.

National Mediator Roster

In 2025, the OGSCC worked in collaboration with the Alternative Dispute Resolution Institute of Canada (ADRIC) to issue a national call for mediators with experience in commercial law or commercial mediation to support the OGSCC's mediator roster for use in the DRMP process.

In January 2026, the OGSCC finalized a national roster of 11 mediators to support operation of the DRMP. The roster includes mediators from across Canada, including bilingual representation, in order to support accessibility for members in different regions and in both official languages.

DRMP Pre-Application Discussions

During this reporting period, the OGSCC received three requests for pre-application discussions pursuant to section 4.1(a) of the DRMP Manual.

Of the three requests received, two were determined to fall outside the scope of the Code and the applicants were advised that the matters could not proceed under the DRMP. In the third matter, the issue raised was assessed by the OGSCC to be Code-related; however, the applicant was advised to complete additional preliminary steps, including reviewing their related commercial agreement and pursuing the dispute resolution mechanisms identified within that agreement (or those outlined in section 6.3 of the Code if their agreement is silent) before proceeding further under the DRMP.

Code Provisions

6.2. A key principle of dispute resolution under the Code will be that the Parties should first exhaust all internal dispute resolution and escalation mechanisms set out in any Agreements prior to resorting to the DRMP.

6.3. If the Agreement is silent on a dispute resolution and escalation mechanism, then the following steps should be fully exhausted as a precondition of either Party referring any dispute relating to the Agreements or the Code to the DRMP:

- a. The dispute should be reviewed by the representative, as set out in section 5.1, in a timely and effective manner; and
- b. If dispute is still unresolved, the dispute should be escalated to a designated member of senior management for each Party with a decision to be provided to the Parties in a timely and effective manner.



3. Membership

Membership in the OGSCC officially opened on July 2, 2025.

Despite the fact that the OGSCC was still finalizing key elements of its governance framework, membership growth throughout 2025 was strong, with spikes following the launch of the membership program and again following the registration of all major retailers. By the end of 2025, membership in the OGSCC had reached 149 members across all six membership classes.

The early months of 2026 marked a period of incremental growth for the OGSCC membership, although the pace of new registrants slowed during the Spring.

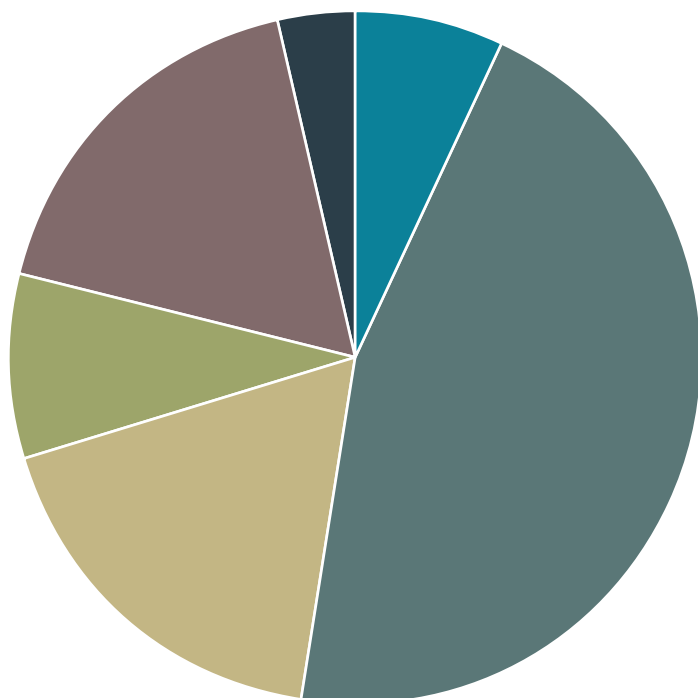
As of May 31, 2026, the OGSCC had a total of 200 members across all membership classes. While membership continues to expand, the pace of new registrations has moderated in recent months, with the Office generally receiving approximately one to two new member registrations per week.

This trend may indicate that the OGSCC is moving beyond its initial growth phase and into a period where more targeted outreach and engagement efforts and continued demonstration of the value of the Code for smaller participants in the grocery sector will be required to reach organizations that have not yet joined the OGSCC.

3.1 Membership by Class

Membership to the OGSCC reflects representation across all six membership classes established under its governance framework. As of May 31, 2026, the distribution of members by class was as follows:

- **Class A** – Primary Producers: 14 members
- **Class B** – SME Manufacturers (\leq \$350M Annual Sales): 91 members
- **Class C** – Large Manufacturers ($>$ \$350M Annual Sales): 36 members
- **Class D** – Non-Affiliated Wholesalers/ Distributors: 17 members
- **Class E** – Independent Retailers (\leq \$1B Annual Sales): 35 members
- **Class F** – Large Retailers ($>$ \$1B Annual Sales): 7 members





Membership distribution continues to reflect full participation from Class F (Large Retailers), consistent with the early commitment from major national retailers. Representation among Class C (Large Manufacturers) is also very well established.

Growth in 2026 has been more pronounced in Class B (SME Manufacturers) and Class E (Independent Retailers); however, these segments remain underrepresented relative to their share of the broader grocery ecosystem. Similarly, Class A (Primary Producers) participation remains an important area of focus for future recruitment efforts.

The Office expects that future membership growth may occur more gradually than during the initial implementation period and may require sector-specific engagement and education activities.

The Office also recognizes that continued growth and broader participation in the Code framework will depend not only on the OGSCC's direct outreach activities, but also on ongoing support and engagement from industry participants and associations across the grocery supply chain. Industry associations can encourage participation within their membership, while OGSCC members can encourage their customers, vendors, and business partners to participate.

The Office believes that increased promotion and engagement by existing members across their commercial networks could play a significant role in supporting broader adoption and participation within the Code framework over time.

3.2 Geographic Distribution

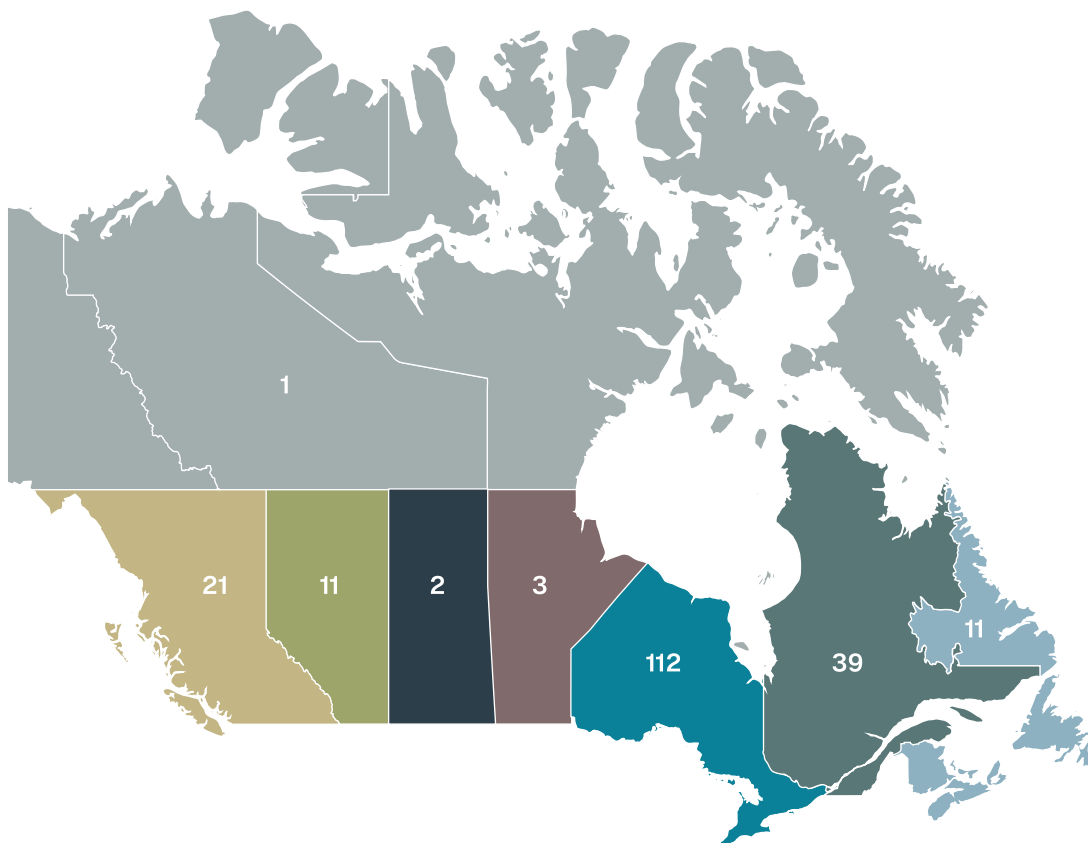
Membership to the OGSCC spans multiple provinces and territories, reflecting the national scope of the grocery sector and the Code. Members are currently distributed geographically as follows:

- **Ontario:** 112 members
- **Quebec:** 39 members
- **British Columbia:** 21 members
- **Alberta:** 11 members
- **Manitoba:** 3 members
- **Saskatchewan:** 2 members
- **Atlantic Canada (NB, NS, PEI, NL):** 11 members
- **Territories (YT, NT, NU):** 1 member

Membership concentration remains highest in Ontario and Quebec, consistent with the size and structure of the grocery sector in these provinces. There is also meaningful representation in Western Canada, particularly in British Columbia and Alberta.

However, participation levels in Atlantic Canada and the territories remain more limited, highlighting potential gaps in regional coverage. These gaps are particularly relevant for ensuring that the perspectives of smaller, regional, and remote market participants are reflected in Code implementation.

As overall membership growth begins to stabilize, improving participation in underrepresented regions and sectors is expected to become an increasingly important focus of future outreach and recruitment efforts.





4. Governance

The first five months of 2026 represented an important transition period in the governance evolution of the Office.

While the OGSCC was legally incorporated in 2023 and governed through an Interim Board structure, the Office itself only became operational in 2025 following the appointment of the President & Adjudicator and establishment of core operational functions.

4.1 Board of Directors

On March 31, 2026, the OGSCC completed its transition to its permanent governance structure through the holding of its inaugural Annual General Meeting (AGM) and appointment of its permanent Board of Directors.

Immediately following the AGM, the newly elected board met and approved proceeding with recruitment of an Independent Chair of the Board.

The decision to hire an Independent Chair reflects the OGSCC's ongoing focus on governance neutrality and operational independence. Pending completion of the recruitment process, the Board approved the appointment of Michael Graydon, CEO of Food, Health & Consumer Products of Canada to continue serving as Interim Chair to ensure continuity during the transition period.

The Board also approved the reappointment of two government observers in accordance with the OGSCC By-Laws, which permit the participation of up to two non-voting government observers at Board meetings.

Prior to the AGM and transition to the permanent Board structure, the Interim Board of Directors met twice during the reporting period. These meetings focused on finalizing key governance, financial, and operational elements required to support the transition to full implementation of the Code and the establishment of the permanent governance structure.

Newly Elected Board of Directors

(in alphabetical order):

- Rob Allsop, Empire Company Limited
- Marc André Bally, Costco Wholesale Canada
- John Danyluk, Earth's Own Food Company
- Jodat Hussain, Loblaw Companies Limited
- Stacey Kravitz, UNFI Canada
- Iain McRuvie, Burnbrae Farms
- Rhonda Mitchell, The Clorox Company of Canada Ltd.
- Pierre Morin, Boulangerie Humanité
- Martin Payant, Unilever Canada
- John Pritchett, Powell's Supermarket
- Steve Roosdahl, BCfresh Vegetables
- Giancarlo Trimarchi, Vince's Market



5. Outreach & Education

Building on the significant outreach, education, and stakeholder engagement activities undertaken during the Office's establishment and implementation phase in 2025, the OGSCC continued to focus on increasing awareness and supporting practical implementation of the Code across the grocery supply chain.

5.1 Activity Summary

Outreach and Education activities during the reporting period focused primarily on:

- supporting member understanding of the Code;
- promoting use of OGSCC resources and processes; and
- increasing awareness and promoting membership in the OGSCC.

Code on the Road

In April 2026, the OGSCC also launched "[Code on the Road](#)," a national engagement and education initiative designed to meet stakeholders where they are through regional sessions, conference appearances, association engagement, and customized educational programming. The initiative is intended to support sector-wide understanding of the Code through accessible and practical engagement opportunities tailored to different audience needs and levels of familiarity with the Code.



Karen Proud – Grocery Innovations Canada 2025 Event



21

Participation in 21 industry events, including conferences, association meetings, and sector roundtables, providing opportunities to engage directly with stakeholders across the supply chain;

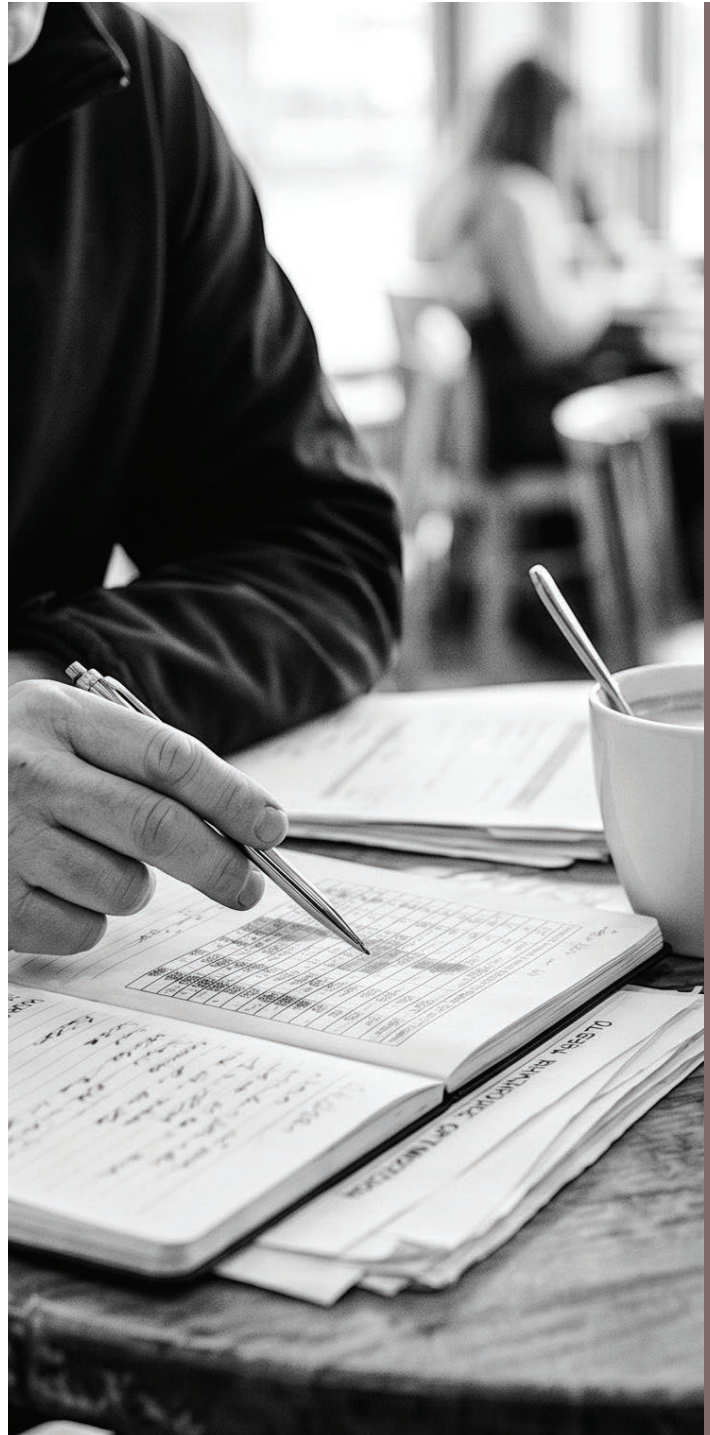
21

Conducting 21 one-on-one meetings with members and prospective members, enabling tailored discussion of organization-specific questions, challenges, and implementation considerations; and

2

Hosting of 2 webinars, designed to provide accessible, introductory, and topic-specific guidance including an overview of the DRMP and how the OGSCC and the Fruit and Vegetable Dispute Resolution Corporation work together in practice.

OGSCC Stakeholder Engagement at a Glance January 1-May 31, 2026



Engagement with Fruit and Vegetable Primary Producers

In April 2026, the OGSCC established the Fruits and Vegetables Primary Producer Liaison Group in recognition of the unique characteristics and commercial realities of this sector of the grocery supply chain.

The Group is comprised of fruit and vegetable grower associations across Canada, including national and provincial associations as well as Class A fruit and vegetable growers. The objective of the Group is to work collaboratively to develop a list of systemic and recurring Code-related issues faced by produce growers across Canada in their commercial dealings with retailers for consideration by the OGSCC in its outreach activities.

Input from the Liaison Group is helping the OGSCC better understand the unique context and commercial realities of this segment of the grocery supply chain. The OGSCC may consider applying a similar engagement approach with other groups within the grocery sector, where appropriate, to better identify and understand issues affecting specific segments of the supply chain.





6. Communications

Since its establishment, the OGSCC has prioritized development of clear, accessible, and transparent communications channels to support awareness and understanding of the Code across the grocery supply chain.

The Office launched its monthly newsletter in April 2025 shortly after becoming operational, providing regular updates regarding implementation activities, governance developments, operational milestones, outreach initiatives, and emerging Code-related issues.

This was followed by the launch of the OGSCC website and Members' Portal in July 2025, creating a centralized platform for:

- member resources;
- governance documents;
- education materials;
- issue reporting; and
- ongoing stakeholder engagement.

Together, these communications tools have become important mechanisms for supporting ongoing communications, transparency, and engagement as implementation of the Code continues to evolve.

5

Newsletters were distributed to a broad range of members and stakeholders, providing updates on the OGSCC's implementation, events, and milestones

10

Member Memos were issued to provide members with timely updates on governance, operational developments, and guidance materials

2

OGSCC Event Emails were circulated to members promote webinars, outreach activities, and key milestones such as the Annual General Meeting; and

3

Code Representative Notice emails were distributed to each organization's assigned Code Representatives.

Email Communications at a Glance



6.1 Direct Communications

Communications activities during the first five months of 2026 focussed on providing members and stakeholders with clear, timely, and practical information through a range of channels.

Member email communications remained a primary tool for direct engagement. During the reporting period, the OGSCC sent a total of 20 email campaigns across its primary distribution streams:

- Newsletters;
- Member Memos;
- OGSCC Event Emails; and
- Code Representative Notices

These communications supported member awareness of new tools, operational developments, governance updates and opportunities for engagement.

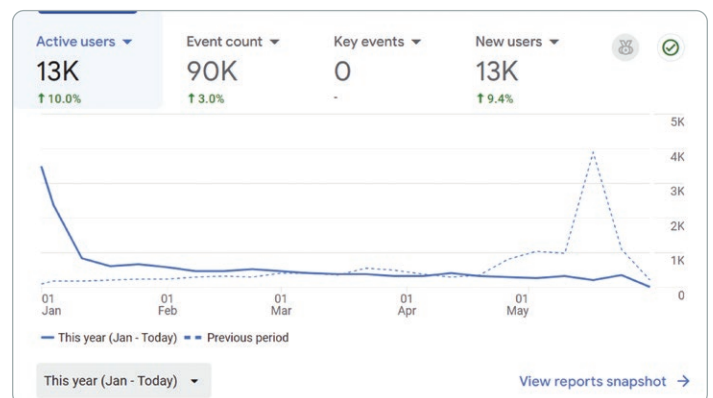
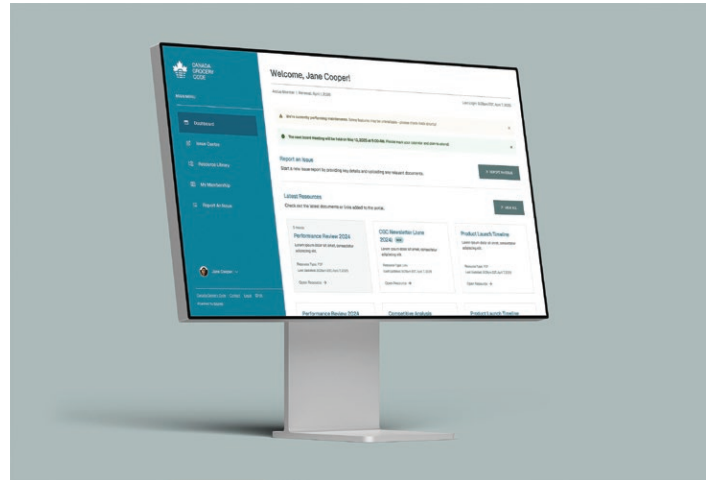
Combined, these email campaigns have an average open rate of 52% and an average click rate of 11%, exceeding industry benchmarks across most communications streams.

6.2 Website and Members' Portal

The OGSCC's website, canadacode.org, continues to serve as a central hub for information and resources.

During the reporting period, the site recorded 13k total active users, reflecting sustained interest from both members and external stakeholders.

The decrease in active users compared to initial launch period was expected and reflects normalization following key implementation milestones, including the launch of the website and membership onboarding activities. Current usage levels remain consistent with steady, ongoing engagement.



6.3 LinkedIn and Media Engagement

As a professional organization serving businesses across the grocery supply chain, the OGSCC has focused its social media presence on LinkedIn, which remains the Office’s sole social media platform. LinkedIn serves as a key channel for external communications and stakeholder engagement, providing an effective means of reaching retailers, suppliers, industry associations, and other participants involved in implementation of the Code.

During the reporting period, the OGSCC published 11 posts and updates, highlighting:

- organizational announcements;
- operational updates;
- new resources; and
- upcoming engagement opportunities.

As of May 31, 2026, the OGSCC’s LinkedIn page had 660 followers, representing an increase of 38% compared to the previous year.

LinkedIn activity continued supporting broader awareness-building and extended the reach of OGSCC communications across the sector.

The OGSCC also responded to seven media inquiries during the reporting period and achieved 379 instances of earned media coverage and pickup across trade publications and other outlets including radio, television, and podcasts.

Media engagement focused primarily on:

- the implementation of the Code;
- the launch of new tools and processes; and
- key organizational milestones.

In 2025, early communications efforts focused on explaining the purpose and scope of the Code to counter common misconceptions, including the mistaken belief that the Code was intended as a mechanism for consumers to address food price inflation. As implementation matured into 2026, communications activities have shifted toward ensuring that members and stakeholders had access to clear, practical, and accessible information regarding the Code and the role of the OGSCC.





7. Priorities for the Remainder of 2026

As the OGSCC moves beyond its initial implementation phase and into full operationalization of the Code, the Office's priorities for the remainder of 2026 will focus on three interconnected areas:

- 1 education, awareness building and recruitment;**
- 2 Code compliance activities; and**
- 3 ongoing governance development.**

Together, these activities are intended to support continued adoption of the Code, strengthen understanding of Code obligations and processes across the supply chain, and ensure the OGSCC's governance and operational frameworks continue to mature alongside the organization.

7.1 Education, Awareness Building and Recruitment

A key priority for the remainder of 2026 will be ongoing awareness-building and education regarding the Code and the role of the OGSCC across the grocery supply chain.

The Office will continue onboarding and engaging members across all six membership classes, with a particular focus on SMEs, independent retailers and primary producers.

This focus is informed in part by the OGSCC's [2025 State of Readiness Survey](#), which identified:

- lower levels of familiarity, preparedness, and expected benefit among smaller industry participants; and
- misconceptions regarding membership requirements, costs, and applicability of the Code for smaller organizations.

The Office will continue to undertake education and awareness-building activities throughout the year, including webinars, presentations, informational materials, and direct engagement with members and stakeholders.





7.2 Code Compliance Activities

The OGSCC's compliance-related work during the remainder of 2026 will focus on:

- monitoring emerging implementation issues;
- ongoing engagement with members and stakeholders;
- guidance development activities;
- Issue Center operations; and
- DRMP management.

As the Office moves from implementation into operational experience under the Code, an important priority will be continuing to refine and regularize internal processes related to issues management and Code-related concerns raised by members and stakeholders. While foundational processes and procedures are now in place, the Office recognizes that ongoing operational experience will be required to determine which approaches are most effective and where further refinements may be needed.

Throughout the remainder of 2026, the Office expects to evaluate how issues are identified, prioritized, assessed, and addressed, including consideration of:

- resource allocation;
- confidentiality considerations;
- stakeholder engagement approaches; and
- broader systemic impacts.

This work will be iterative in nature and informed by practical experience as the Office continues to operationalize its mandate.

Prioritizing Systemic Issues

In addition to managing day-to-day intake of issues, complaints, and stakeholder concerns, the Office intends to identify and prioritize specific systemic or thematic areas for enhanced review and engagement activities throughout the year.

This approach is intended to allow the OGSCC to dedicate focused attention to practices, policies, behaviours, or recurring issue areas that may warrant broader information gathering, stakeholder engagement, educational activities, or potential guidance development.

A particular area of interest for Summer/Fall 2026 will be the issue of “fill rates,” including associated deductions, forecasting practices, and supply allocation concerns. The Office has heard feedback from multiple stakeholders indicating that fill rates represent a significant and complex issue across the grocery supply chain, with differing perspectives among retailers and suppliers.

At this stage, the OGSCC's approach will be to better understand the issue, the operational realities facing different parties, and how these practices intersect with the Code and broader commercial relationships. The Office anticipates that this work will require substantial engagement and information gathering over time.

No predetermined outcome has been established with respect to this work, and the Office has not made any decisions regarding whether the process may ultimately result in guidance development, best practices, educational materials, further information gathering exercises, or other initiatives.

The Office also anticipates assessing what additional issue area or areas may warrant more attention during Fall/Winter 2026. These future focus areas may relate either to broader industry-wide practices and trends or to more targeted policy, operational, or behavioural concerns arising within segments of the supply chain.

The Office expects this thematic and issue-focused approach will become an important component of its broader compliance-support, information-gathering, and education mandate as operational experience under the Code continues to evolve.

Role of the Code Representative

The Office also recognizes that effective implementation of the Code depends not only on formal processes, but also on strengthening direct engagement and problem-solving between parties at the operational level. In this regard, the OGSCC intends to increase effort on supporting the role of designated Code Representatives within member organizations, furthering the work that was completed in March and April to introduce a Code Representative Directory in the Members' Portal and to release a member resource outlining best practices for Code Representatives.

Throughout the remainder of 2026, the Office will look for opportunities to facilitate greater communication, collaboration, and issue resolution among Code Representatives across the sector, with the objective of encouraging earlier discussion and resolution of issues before escalation to more formal OGSCC processes.

The Office believes that one of the most positive long-term outcomes for the sector would be the development of a stronger community of Code Representatives who are comfortable engaging directly with one another regarding Code-related questions, concerns, and implementation challenges. Over time, greater familiarity and trust among Code Representatives may help support earlier dialogue, increased sharing of best practices, and more efficient resolution of issues at the operational level. While this type of community-building will take time to develop, the OGSCC intends to take initial steps during 2026 to support greater interaction and collaboration among Code Representatives across the sector.

As part of this work, the OGSCC is planning to host a virtual meeting of Code Representatives in Fall 2026 focused on the practical operation of the Code during its first months of implementation. The session is expected to provide an opportunity for participants to discuss:

- emerging challenges;
- operational learnings;
- best practices; and
- approaches to resolving issues within the spirit and framework of the Code.

The Office anticipates that strengthening the effectiveness and visibility of Code Representatives will be an important component of supporting collaborative implementation of the Code and promoting more consistent operational practices across the grocery supply chain.



Annual Member Survey

The Office also plans to conduct its first annual member survey during the September–October 2026 period. Unlike the OGSCC’s 2025 industry survey, which focused primarily on assessing the grocery sector’s state of readiness, awareness, and preparedness for implementation of the Code, the 2026 survey is expected to place greater emphasis on gathering operational feedback and implementation experience from members.

The OGSCC expects the survey approach to evolve over time in a manner similar to the [annual supplier surveys](#) conducted by the United Kingdom’s Groceries Code Adjudicator, which are used to gather confidential supplier feedback regarding retailer practices, Code compliance trends, operational challenges, and emerging issues across the sector.

The Office expects this type of ongoing feedback mechanism to become an increasingly important tool for:

- identifying trends;
- informing education and guidance priorities; and
- supporting broader continuous improvement efforts related to Code implementation.

Regular Reporting

The OGSCC will also publish a Fall Report. The report is expected to provide updated information regarding:

- operational activities;
- stakeholder engagement; and
- emerging themes and trends.

In parallel, the OGSCC will begin preparations for its first Annual Report, which is expected to be published in early 2027. Work during the latter half of 2026 will focus on data collection, survey analysis, operational reporting, and identification of key themes and observations arising from the Office’s first full year of operations under the fully implemented Code.

7.3 Ongoing Governance

The remainder of 2026 will also involve significant ongoing governance work as the OGSCC continues to mature as an organization.

A key governance priority during the remainder of 2026 will be the completion of the recruitment and appointment process for the Independent Chair of the Board.

Another governance priority will be the launch of the first formal Code review cycle through the Code Advisory Group. This process will provide a structured mechanism for members and stakeholders to provide feedback and recommendations related to the Code and associated governance documents. The review process is intended to support continuous improvement while maintaining the collaborative and industry-led nature of the framework.

The OGSCC will also begin preparatory work related to the first biannual review of the DRMP, which is scheduled for completion in January 2027. Given the early stage of implementation of the Code and DRMP framework, there may be limited experience with formal DRMP proceedings available to inform the initial review process. While the Office has had experience with pre-application discussions and inquiries related to the DRMP, formal mediation and adjudication processes have not yet proceeded through the full framework.

As a result, the initial review is expected to focus on operational experiences arising from the intake and pre-application stages, stakeholder understanding of DRMP processes, administrative clarity, and identification of any early implementation issues or opportunities for procedural refinement. The OGSCC expects that future review cycles will become increasingly informed by practical operational experience as use of the DRMP framework evolves over time.





8. Concluding Observations

The first five months following full implementation of the Canada Grocery Code have represented an important learning period for both the OGSCC and participants across the grocery supply chain. While implementation remains at an early stage, the experiences and observations outlined in this report are helping to inform the Office’s priorities, guidance-development activities, outreach efforts, and broader approach to supporting implementation of the Code.

The Office recognizes that meaningful change across commercial relationships takes time and that confidence in new processes and institutions develops gradually through practical experience. As organizations continue to operate under the Code, the OGSCC expects to gain additional insight into emerging issues, implementation challenges, and areas where further support, education, or guidance may be beneficial.

Looking ahead, the Office’s focus will remain on supporting awareness, encouraging participation, promoting constructive engagement between parties, and helping members develop greater familiarity with the tools and processes available under the Code. The OGSCC remains committed to working collaboratively with members and stakeholders across the grocery supply chain to support effective implementation of the Code and its long-term success.



This project is funded through the Regional Collaboration Program under the Sustainable Canadian Agricultural Partnership, an agreement between federal, provincial and territorial governments.





CANADA
GROCERY
CODE

Office of the Grocery Sector
Code of Conduct (OGSCC)

1 Rideau Street
7th & 8th Floor
Ottawa, ON. K1N 8S7

613.670.5893
info@canadacode.org
CanadaCode.org