

A NEW SEASON ACROSS THE COLD CHAIN POLICY LANDSCAPE

A busy agenda is shaped by regulatory, legislative, and political developments nationwide.

By Lindsay Shelton-Gross

If the past three months have taught us anything, it's that the cold chain never gets a quiet quarter. So, buckle up: as 2026 heads into its final stretch, GCCA members are navigating a packed lineup of regulatory, legislative, and geopolitical developments across every region.

Here's where things stand and what's worth watching.

United States

- **Cold storage legislation signed into law in California.** Two "gut and amend" bills born out of the June 2026 Boyle Heights fire have now moved through Sacramento. AB 817, introduced by Assembly Member Mark Gonzalez, requires new cold storage facilities over 20,000 square feet to create and maintain a contingency fund of up to \$20 million to receive building approvals.

GCCA led a fierce opposition to AB 817 and was an active part of the opposition coalition for SB716; however, on September 27, California's Governor Gavin Newsom signed both bills into law. While these laws do not go into effect until January 1, 2027, GCCA commits to regularly updating members and industry stakeholders on our next steps in continued engagement with the legislature.

- **Low-oxygen systems for fire prevention.** GCCA is leading an independent, observational field study on cold storage environments operating under reduced-oxygen (low-ox) conditions used for fire prevention. The study aims to give the industry an evidentiary basis for engaging with the Occupational Safety and Health Administration (OSHA) on how to comply with the Respiratory Protection Standard (29 CFR 1910.134).

The research is led by Prof. Thomas Küpper (RWTH Aachen University), with Prof. Peter Hackett (University of Colorado), and PhD candidate Clara Wehle representing the United States. In the past few weeks, 105 fieldwork participants in the United Kingdom, Germany, and the Netherlands tested "lite" gear, like half masks and nose cannulas. The U.S. Small Business Administration's Office of Advocacy recently recommended that the Department of Labor and OSHA review and potentially reform 12 workplace safety

regulations, including reduced-oxygen environments, with cold storage specifically recognized for using low oxygen to prevent and suppress fires.

- **Traceability: FSMA Rule 204 compliance deadline is July 20, 2028.** For 3PL cold storage operators, FSMA 204 carries particular significance because they will be expected to maintain systems that support all customer compliance obligations. GCCA is working to spread the word on deadlines and requirements, update compliance guidance, host webinars for members and industry stakeholders, and engage directly with the Food and Drug Administration (FDA) to educate and inform warehouse operators.

GCCA is a member of the Partnership for Food Traceability coalition, and sits on FDA's Traceability Committee and Pilots Committee. Additionally, GCCA is an active member of two coalitions. The Partnership for Food Traceability (PFT) is an independent, sector-neutral nonprofit developing a shared, overarching vision for food traceability across the supply chain. The Food Industry FSMA 204 Collaboration, organized by GS1, shares industry resources and brings together trade associations and industry groups to provide resources supporting education and guidance.

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Canada

In recent months, the Canadian federal government has strongly emphasized strengthening economic competitiveness by reducing red tape, improving productivity, and building more efficient supply chains. For the cold chain, this creates a policy environment focused on facilitating trade, improving infrastructure, and supporting the movement of goods across Canada.

- **National Food Security Strategy:**

Launched in June 2026, the strategy commits to expanding domestic food production, increasing year-round food availability, strengthening food security, and reducing regulatory barriers across the agri-food supply chain.

- **Trade and Market Access:** Canada is also advancing its trade diversification agenda and expanding market access opportunities for Canadian businesses. Key priorities include strengthening economic partnerships with India, deepening engagement across the Indo-Pacific region, expanding commercial opportunities in the Gulf through the Canada-UAE agreement, and supporting exporters through initiatives such as the Strategic Exports Office.
- **Building Canada Strong Act:** Bill C-39 has already advanced to second reading and remains a key priority for the fall parliamentary session. The legislation includes measures to establish strategic trade corridors, reduce transportation bottlenecks, modernize port governance, advance trade digitalization, and streamline permitting processes. For the cold chain, these developments signal a clear commitment to improving the efficiency and resilience of Canada's agri-food supply chain.
- **Canadian Food Inspection Agency (CFIA) and Digitization:** GCCA members were invited to participate in a listening session with CFIA officials, providing an opportunity to hear directly from regulators as they demonstrated the MyCFIA portal. The session also allowed members to discuss operational challenges and share feedback, reinforcing GCCA's role as a valuable resource to CFIA as it continues to advance its digitization efforts.

Europe

- **European priorities and the cold chain:**

Trade and tariff uncertainty, the ongoing geopolitical crisis, and energy and supply chain resilience remain the dominant themes for European members this fall. An analysis of online food security conversations showed that the cold chain has low visibility as a standalone sector and is mentioned indirectly in transportation, storage, or supply chain topics.

Policymakers generate 85% of engagement, focused mainly on energy costs, food waste, and climate resilience.

- **GCCA policy influence:** Strengthening the base of GCCA's European policy presence begins with policy setting and prioritization by the European Advisory Council and Government Affairs Committee. Opportunities include developing a European Cold Supply Chain Roundtable to raise cold chain issues at the EU level and deepening engagement on topics such as energy costs, fisheries, resilience, and food waste. Additionally, GCCA is examining the 2026 EU Maritime Strategy and the new EU Maritime Alliance to advocate for cold chain visibility in maritime and port sectors.

Latin America/Brazil

- **Brazilian Tax Reform:** Brazil's tax reform continues to be the headline issue for GCCA members. Starting January 1, 2026, Brazil began the practical rollout of its major indirect tax reform, introducing two new consumption taxes – CBS at the federal level and IBS at the state and municipal level under Complementary Laws No. 214/2025 and 227/2026 – replacing five existing levies. Authorities have described 2026 as an “educational year,” with a penalty-free testing period once detailed rules are published. For cold chain operators, this affects invoicing systems, pricing, supply chain contracts, and cash flow. The transition is expected to run through 2033.
- **EU Restrictions on Imports:** On September 3, the European Union began implementing restrictions on the entry of animal protein products originating from Brazil, pursuant to Regulation (EU) 2019/6 regarding the use of antimicrobials. A recent European Commission audit concluded that Brazil's control systems provide enough information to certify that poultry meat exported to the EU complies with new restrictions. Its findings should pave the way for poultry exports

to resume once Member States vote to restore them at the relevant Standing Committee on Plants, Animals, Food and Feed (SCOPAFF). While good news for poultry, Brazilian beef exports are not expected to resume for at least two years, reflecting the time it takes to raise beef cattle to slaughter. The report will be discussed at the next SCOPAFF Controls and Import Conditions meeting in October.

Africa

- **GCCA convenes in Johannesburg.** GCCA's 2026 Africa Cold Chain Conference in September examined how policy and government decisions shape the continent's perishables trade. Discussions covered the regulatory environment for Africa's food supply chain, infrastructure financing, and operating costs. Delegates also considered how geopolitical tensions, shifting trade relationships, energy supply volatility, and economic pressures are affecting perishable imports and exports. Additionally, GCCA Africa's Food Safety & Compliance Committee met during the conference. A revised draft of VPN 38: Veterinary Quarantine and Public Health was announced by Dr. Mphane Molefe, Director of Veterinary Public Health, Department of Agriculture. GCCA is working with the Department of Agriculture, Forestry, and Fisheries to obtain the draft and respond with an industry perspective.

Finally, GCCA's Africa Council continued work on setting future priorities around engagement with governments and regional authorities, collecting insights on Africa's cold chain businesses, creating networks to tackle shared challenges, collaborating on new opportunities, and determining the role cold chain infrastructure can play in increasing intra-African trade under the AfCFTA.

- **Member-exclusive information from the Center for Risk Assessment (CRA).** Members are eligible to receive monthly political and economic analysis briefings from CRA, typically linked in GCCA's Policy Weekly. Interested in receiving this brief directly? Contact Lindsay Shelton-Gross, lsheltongross@gcca.org. 📧

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