*The Canadian Food Inspection Agency is collecting information from Canadian food industry stakeholders for the purpose of determining expected costs and benefits of amending Canada’s food labelling requirements under the Food and Drug Regulations and the proposed Safe Food for Canadians Regulations. All numerical data will be consolidated on a provincial or national level. No information that could identify a specific company will be published.*

***Note*** *the information provided should only estimate the impacts directly attribute to the proposed FLM regulatory amendments. We ask that you please exclude any impacts that would have occurred in the absence of the proposed amendments, such as other regulatory requirements already coming into force (e.g. Health Canada’s amendments to nutrition labelling and list of ingredients, which were published in Canada Gazette Part II in December 2016).*

**Survey for Canadian Food Industry Stakeholders**

*Please only include information for your* ***Canadian*** *operations as part of your response.*

**PART A - PROFILE QUESTIONS:**

1. Please indicate whether you are responding on behalf of:

Multiple facilities  Individual facility

1. What is the name of your facility? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(Optional)
2. What type of activities best describe your facility that you operate in Canada? *Please check all that apply:*
   1. Manufacturing
   2. Retail/Distribution
   3. Import
   4. Others: please specify \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
3. In which provinces/territories are your facilities located? *Please check all that apply:*

NL PE NS NB QC ON MB SK AB BC YT NT NU

1. Are any of your facilities located on First Nations/Inuit/Métis land? YES NO
2. For the purpose of this survey, a “Small Business” is defined as: *“Any business, including its affiliates, which has fewer than 100 employees or generates between $30,000 and $5 million in annual gross revenue.”*
   1. Does your business currently meet the above definition of a Small Business? YES NO
   2. Number of employees (including full-time, part-time and/or seasonal staff): \_\_ \_\_\_\_\_
3. Does your business currently generate less than $30,000 in annual gross revenue? ☐YES ☐NO

For Parts A to G, each distinct product for sale is associated with a “**Stock Keeping Unit (SKU)**”. This means a product with one unique recipe may have multiple SKU’s as it may be marketed in different types of packaging (bottle, can, etc.), sizes, and/or brands

1. Approximately how many SKUs does your facility have? (i.e. the total number of products and the different packaging sizes or types) \_\_ \_\_\_\_\_

**Of the total SKUs,** what percentage of SKUs are packaged on-site at your Canadian facility: \_\_ \_\_\_\_\_%

1. On average, how frequently do you change the majority of your product labels? \_\_ \_\_\_\_\_
2. How long is your inventory of labels/packaging held before use? Specify the **proportion** of your total labels/packaging held for the following durations:

≤1 year: \_\_\_\_\_\_\_\_%

>1 year and ≤2 years: \_\_\_\_\_\_\_\_%

>2 years: \_\_\_\_\_\_\_\_%

Total: 100%

1. Specify the costs of labels/packaging for your inventory held for the following durations?

≤1 year: $\_\_\_\_\_\_\_\_

>1 year and ≤2 years: $\_\_\_\_\_\_\_\_

>2 years: $\_\_\_\_\_\_\_\_

**PART B – DATE MARKING AND STORAGE CONDITIONS**

**Details of the Regulatory Proposal:**

*The regulatory proposal would require all prepackaged foods (unless exempt, e.g. vinegar, chewing gum, prepackaged fresh fruits and vegetables, etc.) to have a best before date when an expiration date is not required. (As per the current requirement, expiration dates will continue to be required only on formulated liquid diets, meal replacements, nutritional supplements, human milk substitutes, and foods represented for use in a very low-energy diet.)*

*If the best before date of food products is greater than 90 days, the date mark would need to include at least the month and year. (As per the current requirement, best before dates of 90 days or less would need to include the day, month, and if needed for clarity, the year.)*

*Moreover, the regulatory proposal would require any foods declaring a date mark to provide storage instructions if they differ from normal room temperature. It would also require storage instructions to be provided if needed to support the integrity of the prepackaged food on products exempt from date marking.*

*Format options for the best before date and expiration date would include the current format with bilingual month abbreviations, as well as numerical formats. For small packages with an available display surface of less than 100 cm2, an abbreviation, such as “BB/MA” could be used.*

**Examples of the Proposed Format Options:**

Best before/ Meilleur avant

**17 JN 28**

**yy/mm/dd-aa/mm/jj**

Best before/ Meilleur avant

**2017 JN 28**

Best before/ Meilleur avant

**28/06/17**

**dd/mm/yy- jj/mm/aa**

1. Approximately what percentage of SKUs would require a label change/modification due to the proposed requirements for date marking and storage conditions? \_\_ \_\_\_%
2. Do you currently use an inkjet printer, or any other type of printer, to apply the date marking and storage conditions on labels? ☐YES ☐NO

**If *“YES”,***

a. Approximately how many inkjet printers, or other printers, do you have? \_\_ \_\_\_\_\_

1. Would you need to buy new printers to comply with the proposed date marking and storage conditions requirements?

☐YES ☐NO ☐UNCERTAIN

**If “*YES*”,**

1. On average, how much would it cost to buy a new printer? $\_\_ \_\_\_\_\_ (per unit)
2. Approximately how many printers would you buy? \_\_ \_\_\_\_\_
3. Would you need to modify your existing and/or new equipment to comply with the proposed date marking and storage conditions requirements?

☐YES ☐NO ☐UNCERTAIN

**If “*YES*”,**

* 1. On average, how many hours would it take to modify all the equipment? \_\_\_\_\_\_\_\_\_

1. Approximately how many hours would be dedicated to graphic design (i.e. to modify the design/layout of the labels/packaging) due to the proposed date marking and storage conditions requirements?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (hours per SKU) OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

**PART C – FOOD COMPANY INFORMATION**

**Details of the Regulatory Proposal:**

*The regulatory proposal would require all prepackaged foods to include one modern form of contact information on the label which would enable two-way communication, in addition to the current requirements for city and country or city and province. Contact information could be a telephone number, email address, postal address, website, or any other means of communication between the dealer and consumer.*

**Examples of the Proposed Change:**

ABC Co.

Toronto, Ontario

**ABC.CO@INFO.CA**

ABC Co.

Toronto, Ontario

**1-800-777-8888**

ABC Co.

Toronto, Ontario

**www.abcfoods.ca**

ABC Co.

Toronto, Ontario

**M5S 1T8**

1. Approximately what percentage of SKUs would require a label change/modification due to the proposed requirements for food company information? \_\_ \_\_\_%
2. Do you currently provide any of the following information on your label? *Please check all that apply:*
   1. ☐ Postal address
   2. ☐ Email
   3. ☐ Telephone number
   4. ☐ Website
   5. ☐ None of the above

**If “*None of the above*”,** which form of contact information, would you choose to provide on your labels? *Please check all that apply*:

1. ☐ Postal address
2. ☐ Email
3. ☐ Telephone number
4. ☐ Website
5. ☐ Other: please specify \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
6. Would you need to add additional resources to manage the new method(s) of communication?

☐YES ☐NO ☐UNCERTAIN

**If “*YES*”,** please specify the additional hours/year needed to manage the new method(s) of communication: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Approximately how many hours would be dedicated to graphic design (i.e. to modify the design/layout of the labels/packaging) due to the proposed food company information requirements?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (hours per SKU) OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

**PART D – ORIGIN OF WHOLLY IMPORTED FOOD**

**Details of the Regulatory Proposal:**

*The regulatory proposal would require all wholly imported foods to include the country of origin on product labels. Wholly imported foods are those that come into being outside of Canada (e.g. candies made in another country), and includes imported foods that are repackaged in Canada. Country of origin would be defined as the country where the food was produced or last substantially transformed (e.g. manufactured, processed, treated, or preserved) in a way that changes its nature. This information would be required on the label with or in close proximity to the dealer name and address declaration and in characters of at least the same prominence. If a food has different countries of origin in a 12 month period, it would be possible to indicate all those countries on the label.*

**Examples of acceptable methods of declaring country of origin:**

*1) listing the name and address of the Canadian dealer, with the country (or countries) of origin;*

*2) listing the name and address of the foreign manufacturer*

1. Approximately what percentage of SKUs would require a label change/modification due to the proposed requirements for origin of imported food? \_\_ \_\_\_%

**Of the SKUs requiring a label change/modification,**

* 1. What percentages of SKUs are labelled by your Canadian facility? \_\_ \_\_\_\_\_%

1. Do you currently have origin of imported food information available (e.g. through invoices)?

☐YES ☐NO

**If *“YES”,***onaverage, how many hours would it take to **organize and compile** origin of imported food information for **all** the SKUs that would need to be changed/modified? \_\_ \_\_\_\_\_\_\_ (total hours)

**If *“NO”,*** approximately how many hours would it take to **obtain**, **organize and compile** origin of imported food information for **all** the SKUs that would need to be changed/modified?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

1. Approximately how many hours would be dedicated to graphic design (i.e. to modify the design/layout of the labels/packaging) due to the proposed origin of imported food requirements?
   1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (hours per SKU) OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

**PART E – INFORMATION ON EMPHASIZED INGREDIENTS**

**Details of the Regulatory Proposal:**

*The regulatory proposal would require prepackaged food products that highlight or emphasize an ingredient (through words or pictures) on the label to declare the percentage of the highlighted ingredient. There would be certain exceptions:*

*- ingredients referenced as part of a prescribed common name of a food with a standard of identity (e.g. meat burger);*

*- herbs, spices or other ingredients added in small amounts to flavour a food, or other minor ingredients such as food additives;*

*- ingredients with amounts that do not differ significantly between foods; and,*

*- ingredients that already declare the amount such as through a quantitative statement or drained weight declaration.*

*For flexibility, the percentage for highlighted claims could be grouped with the ingredient list, common name or with the most prominent claim.*

*In addition, the regulatory proposal would require an indication that the food is flavoured on prepackaged foods when flavours (instead of the emphasized ingredient) or ingredients added in flavouring amounts have been used. The percentage of the emphasized ingredient would then not need to be shown.*

**Examples of the Proposed Changes:**

**Strawberry Yoghurt**

**Ingredients:** Milk ● Sugar ● Strawberries (3%) ● Bacterial culture● Flavour● Carob bean gum

● Allura Red.

**Strawberry Flavoured Yoghurt**

**Ingredients:** Milk ● Sugar ● Bacterial culture● Strawberry Flavour ● Carob bean gum ● Allura Red

1. Approximately what percentage of SKUs would require a label change/modification due to the proposed requirements for percentage of key emphasized ingredients? \_\_ \_\_\_%
2. Do you currently have percentage of key emphasized ingredients information available (e.g. through product formulations)?

☐YES ☐NO

**If *“YES”,***onaverage, how many hours would it take to **organize and compile** percentage of key emphasized ingredients information for **all** the SKUs that would need to be changed/modified? \_\_ \_\_\_\_\_\_\_ (total hours)

**If *“NO”,*** approximately how many hours would it take to **develop**, **organize and compile** percentage of key emphasized ingredients information for **all** the SKUs that would need to be changed/modified?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

1. Approximately how many hours would be dedicated to graphic design (i.e. to modify the design/layout of the labels/packaging) due to the proposed percentage of key emphasized ingredients requirements?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (hours per SKU) OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

**PART F – LEGIBILITY AND LOCATION**

**Details of the Regulatory Proposal:**

*The regulatory proposal would require all prepackaged food products to:*

*a) Display most mandatory information (such as date marking, storage instructions, country of origin, dealer name and address) using prescribed minimum type heights in font that is not condensed or scaled\*;*

*- Minimum 1.6 mm height, based on the lower case “x”, when upper and lower case letters are used;*

*- Minimum 2.4 mm height, based on the upper case “H”, when only upper case letters are used; and,*

*- Smaller type heights may be used for very small packages with a principal display surface of not*

*more than 10 cm2 (i.e., 0.8 mm when mixed case letters or 1.2 mm when all capital letters).*

*b) Display mandatory information using adequate contrast and in a manner that is not obscured by packaging or labelling designs or crowded with other information such that the visibility of mandatory information on the label is diminished;*

*c) Display the common name in a single boldfaced font using a type height proportional to the size of the main panel of the label (same type height as used for the net quantity declaration when mixed case letter are used, and 1.5 times that size if all upper case)\*.*

*\* applies only to consumer prepackaged food products*

*In addition, the regulatory proposal would provide consistent location requirements for certain labelling information: country of origin would have to be* *grouped with dealer name/address and storage instructions would have to be on front of package, or grouped with the list of ingredients.*

1. Approximately what percentage of SKUs would require a label change/modification due to the proposed requirements for legibility and location? \_\_ \_\_\_%
2. Approximately how many hours would be dedicated to graphic design (i.e. to modify the design/layout of the labels/packaging) due to the proposed legibility and location requirements?

\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (hours per SKU) OR \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (total hours)

**PART G – STANDARD CONTAINER SIZES**

**Details of the Regulatory Proposal:**

*The regulatory proposal would repeal standard weight and container size requirements for certain products and commodities. In addition, the remaining standard container sizes would be moved to a compendium to be incorporated by reference.*

1. Do you currently submit Ministerial Exemption (ME) applications under the *Fresh Fruits and Vegetables Regulations* (FFVR, form 4685)and the *Processed Products Regulations* (PPR, form 5567)?

☐YES ☐NO

**If *“YES”,***

1. On average, how many minutes does it take to **fill out** one form:
   1. form 4685 \_\_ \_\_\_\_\_\_ \_ (per form)
   2. form 5567 \_\_ \_\_\_\_\_\_\_ (per form)
2. Onaverage, how many hours does it take to **organize and compile (including proof of shortage documents)** the information required each time when you apply to the CFIA for:
   1. FFVR \_\_ \_\_\_\_\_\_ \_
   2. PPR \_\_ \_\_\_\_\_\_\_
3. Do you currently submit Test Market Authorization (TMA) applications for the *Processed Products Regulations (PPR) or* the *Fresh Fruits and Vegetables Regulations (FFVR)*?

☐YES ☐NO

**If *“YES”,***

1. On average, how many minutes does it take to write the **letter accompanying the application**:
   1. For a PPR TMA \_\_ \_\_\_\_\_\_ \_
   2. For a FFVR TMA \_\_ \_\_\_\_\_\_ \_
2. On average, how many hours does it take to **organize and compile** the information requiredto apply to the CFIA:
   1. For a PPR TMA \_\_ \_\_\_\_\_\_ \_
   2. For a FFVR TMA \_\_ \_\_\_\_\_\_ \_

**PART H – GENERAL QUESTIONS**

1. Approximately what percentages of SKUs currently meet **all** of the proposed amendments? \_\_\_\_\_\_\_\_\_\_\_%
2. Would there be any efficiency gains in graphic design (i.e. to modify the design/layout of the labels/packaging) if changes/modifications for **2 and/or more** of the amendments were made simultaneously: ☐YES ☐NO

**If *“YES”,***please indicate the estimated percentage reduction in total hours required:

☐25% ☐50% ☐75% ☐other \_\_\_\_\_\_ (if other, please specify amount in %)

1. Please provide/describe any additional costs related to potential modifications to label designs for the following provisions (specify dollars per item):
   1. Date Marking and Storage Conditions:
   2. Dealer Name and Address:
   3. Country of Origin:
   4. Percentage Ingredient Declaration:
   5. Legibility and Location:

**PART I – BENEFITS/SAVINGS**

Please provide any comments regarding positive impact/benefits, including dollar amount, if possible, on your facility. When providing any comments, please consider the list of proposed changes as outlined in the survey cover letter.

**PART J - OTHER**

Please provide any additional comments.

**OPTIONAL:**

Please provide contact information in case we need to follow-up and verify any information in the response.

NAME:

EMAIL:

PHONE NUMBER:

ADDRESS:

*Thank you for completing this survey. Please return your reply by* ***July 20, 2018*** *at:*

[cfia.labellingmodernization-modernisationetiquetage.acia@canada.ca](mailto:cfia.labellingmodernization-modernisationetiquetage.acia@canada.ca)

**Or mail to:**

Attention: Food Labelling Modernization Team

Consumer Protection and Market Fairness Division

Canadian Food Inspection Agency

Tower 2, 6th floor

1400 Merivale Road, Ottawa, Ontario K1A 0Y9

**Or fax to: 613-773-5603**