

CPMA Response to CFIA Request for Additional Information on Labelling Modernization – December 2013

(From CFIA): From the online consultation, **some of the issues you raised with respect to regulations:**

- Placement on panel and size of required information should be the same for all commodities
- Harmonize date marking and nutrition labelling with international standards
- Reserve bolding of text only for safety on labels (e.g. allergens)
- Exempting fresh fruit and vegetables from having a nutrition facts table limits the ability to make health claims on their products
- CFIA will be further engaging you in the next couple of weeks to obtain your views on food labelling regulations. We will be looking for any additional input you have, as well as specific examples.

Food Labelling Modernization (FLM) – Key Questions

1. Considering the FLM scope, regulations that fall under CFIA's responsibility (non-health and safety requirements) and international agreements and standards, **what, if any, mandatory requirements require revision?**

- **Placement format and type size of required information** – this should be the same for all food commodities (Presently there are differences in the size requirement for information related to **net contents** on pre-packaged foods for processed products and fresh fruits and vegetables (e.g. Fresh Fruit and Vegetable Regulations 12.2 (2), Processed product regulations **36.** (1) and (2), and Consumer Packaging and Labelling Regulations **14.** (1), (2), and (4)). In fact, font size should reflect government's desire for outcome based results – prescriptive font size beyond a minimum presents unnecessary challenges to industry with little benefit to consumers. (Fresh fruits and vegetables are presently required to use font sizes relative to the size of the principal display surface of the package)
 - Net contents declaration on prepackaged produce items should continue to allow for declaration as weight, volume or numerical counts (whichever is appropriate for the commodity). Terms such as, one bunch should also be accepted for products sold in this manner.

- **Date markings (e.g. Best Before Dates)** – this should be harmonized with international requirements and standards to eliminate costly and complicated packaging requirements by country. Eliminate unnecessary prescriptive terms allowed for use in expressing date.
 - **Nutrition Labelling** – Efforts should be made to harmonize, as much as is possible, nutrition facts table format and information with other countries.
 - **Grade marks** – prescriptive grade requirements for **fresh fruits and vegetables**, as per the grade standards, should not be housed in the regulations but rather in documents or standards incorporated by reference
 - **Labels on fresh fruits and vegetables in clear transparent packaging, such as open bags for grapes and cherries, which have been packaged at other than retail and have included labelling information, should be considered catch-weight** packages and exempted from declaration of net weight markings, as the weight will be determined at the check-out cash.
 - Every attempt should be made to harmonize all labelling requirements as much as possible with international trading partners.
2. For the commodities of which you have knowledge, what standards of identity, if any, would you change?
- Standards of Identity are regulations that describe what ingredients a particular food, with a specific name, must contain or what ingredients may be added (and, in some cases, how it should be made). Some examples are vegetable oils, bread, pickles, and spices.
 - In light of the above, standards of identity do not apply to fresh fruits and vegetables; we therefore will forgo comment to this question and leave it to the industry stakeholders representing the foods to which Standards of Identity apply to provide input.
3. Considering commodity specific labelling, what would you maintain, amend or remove?
- Mandatory information required under the FFVR (e.g., grade, country of origin, size, variety, registration number, etc.) may be printed on a tag attached to a prepackaged container of apples – **this provision should be extended to all commodities.**
 - As mentioned in our previous submission to the on-line consultation on Labelling Modernization, Government should have in place a regulatory framework that is

responsive to consumer and industry needs and that is adaptive to market and technological change and innovation.

- As mentioned above the requirements for different font sizes relative to the size of the principal display surface of a fresh fruit and vegetable package should be removed. (See answers in previous question 1)

Online Labelling Tool Questions

1. What are the most important types of information you look for on the CFIA Website?

Information related to Fresh Fruit and Vegetables such as:

- Links to regulations, specific regulatory requirements, policy and decisions made on areas of regulation that have required interpretation
- Guidance documents – such as labelling guides, organic products, food safety
- Questions and answer pages
- Inspection manuals
- Recall information
- What's new
- Links to CFIA staff for assistance
- Links to consultations, webinars etc.
- Press releases

2. How can the content of the Online Labelling Tool best serve the needs of industry?

- A main directory of all requirements should be made available with links to the different regulations and the administering agency.
 - Commodity specific sections to address specific requirements
- A directory of reference and guidance documents should be included
- A link to CFIA or relevant department to submit questions or provide feedback relative to regulatory requirements or labelling should be available
 - A directory of policy decisions based on the questions or feedback above should also be available