



Bureau of Nutritional Sciences
Food Directorate
Health Canada
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Submitted Via Email

To Whom It May Concern:

RE: *Notice of proposal to update the nutrition labelling: Table of daily values*

On behalf of the Canadian Produce Marketing Association, it is my pleasure to provide comments to Health Canada's proposed amendments to the Table of Daily Values. We would particularly like to express our appreciation for the Bureau's flexibility in granting us an extension for our submission.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate, spanning the entire produce industry. The produce industry generates over \$17 billion annually in economic activity throughout the supply chain and supports over 249,000 jobs across Canada. The Association's members include major growers, shippers, packers and marketers; importers and exporters; transportation and logistics firms; brokers, distributors and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

1. The proposed change to the Daily Value (DV) for Potassium from 4700 to 3400 mg would align with the present U.S. DV used for Potassium in a Nutrition Facts Table (NFT), and CPMA agrees with alignment with trading partners when ever possible.
2. CPMA believes it is positive that the proposed change in Potassium DVs will result in more food products meeting the new conditions to make a "source of" (170 mg), "good source of" (340 mg) or "excellent source of" (510 mg) claim, which can be utilized by the fruit and vegetable sector without having to provide an NFT.
3. The 2016 amendments to the *Food and Drug Regulations (FDR)* required that Potassium values be included in the core elements for an NFT and the daily values for Potassium were also

amended to a DV of 4700 mg /day. The transition period for the 2016 *FDR* amendments will end on December 14, 2021, requiring all NFTs included on packaged goods to include all requirements of the 2016 *FDR* amendments, including those for potassium. Although as stated in the rationale for the proposed change to Potassium DVs, redesign of a label will not be required to make this change, changes within the NFT, when provided, will be necessary for compliance with the proposed amendments. Many industry members have already made the required changes to their packaging to include the NFT requirements and will therefore require another change to their NFTs going forward. **See Comment 5 below for CPMA comment on proposed transition period.**

4. Similarly, although the proposed changes to the sodium DVs will not require changes to all labels, there will still be a required change in NFTs for food intended for certain populations, when an NFT is provided, even if voluntarily. A sufficient transition period must be considered, as the previous changes in the 2016 *FDR* amendments to food labels, (for which the transition period ends on December 14, 2021), have already been made by many food industry stakeholders. **See Comment 5 below for CPMA comment on proposed transition period.**
5. Health Canada states that the proposed changes to the Table of Daily Values will be made the day on which the Notice of Modification (NOM) is published on Health Canada's website. Given the nature of the proposed changes, Health Canada proposes to give industry until December 14, 2023, to implement these changes. During this time, the new [2021 Table of Daily Values](#) and the previous [2016 Table of Daily Values](#) may apply. Health Canada suggests that this will provide industry with sufficient time to implement these changes and align with the 2016 nutrition labelling amendments to the *FDR*, and therefore only the new [2021 Table](#) will be in effect by December 15, 2023.

CPMA strongly urges Health Canada to provide at least 5 years for transition. Particularly given that the food industry has been coping with the impacts and economic challenges of the COVID-19 pandemic, and many companies have already recently changed their packaging to comply with both the *Safe Foods for Canadians Regulations* and the 2016 *FDR* labelling amendments, it is both necessary and reasonable to provide a similar transition period as granted for the 2016 *FDR* amendments.