



Bureau of Nutritional Sciences  
Food Directorate  
Health Canada  
Email: [hc.bns-bsn.sc@canada.ca](mailto:hc.bns-bsn.sc@canada.ca)

September 9, 2021

**Submitted Via Email**

To Whom It May Concern:

**RE: *Notice of proposal to update the nutrition labelling: Table of reference amounts for food***

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 Reference Amounts for Food. 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**

CPMA is supportive of Health Canada's proposal to include salad kits/bowls consumed as a meal, as well as salads and salad kits consumed as part of a meal, in the *Table of Reference Amounts for Food*. These products offer Canadians a convenient way to make healthy eating choices and to try new combinations of foods. Their inclusion in the *Table of Reference Amounts for Food* can provide clarity and predictability for both consumers and industry. We therefore urge Health Canada to consider the following:

N.2.

We are supportive of the inclusion of a reference amount for salad kits/bowls consumed as meals. This is a growing product category with the potential to contribute positively to increased consumption of fresh

produce among Canadians, particularly as more people return to the office post-pandemic. CPMA would note that single-serving salad kits/bowls consumed as a meal may vary in weight depending on their composition and the ingredients included in the salad, even if they are produced by the same company and packaged in the same container size. **We would urge Health Canada to provide greater clarity in the table as to the composition/types of ingredients needed for a salad kit to be included in N.2. Further clarification is also required as to whether these products would be considered a “main dish”, and this should be included in the Table or as a footnote.**

Q.1. and Q.1.1.

While we are supportive of Health Canada including salads and salad kits consumed as part of a meal in the Table under Q.1 and Q.1.1, **CPMA recommends that greater clarity be provided as to how a product is determined to fall under each of these categories.** For example, it is unclear why “broccoli salad” and “carrot salad” are specifically listed at Q.1 separately from the previously included “vegetable” salads. If Health Canada’s intention is to include pre-mixed salads, including those prepared at retail, under Q.1., and to have salad kits requiring mixing by the consumer included under Q.1.1., this should be more explicitly stated in the table. For example, salads at Q.1 could be referred to as pre-mixed salads; salad kits at Q.1.1 could be referred to as being prepared or mixed by the consumer.

Furthermore, we recommend that the reference amounts for the two categories of salads should be consistent, as many of the same food categories (such as vegetables, meat, cheese and dressing) may be present in both pre-mixed salads and in salad kits requiring mixing by the consumer. Based on internal market research, 100g is regularly used by industry as a serving size for multi-serving salad kits consumed as part of a meal. This is also the reference amount used by the [U.S. Food and Drug Administration](#) for salads. To promote consistency, and given the highly-integrated nature of the North American market, **CPMA recommends that Health Canada use 100g as the reference amount at both Q.1 and Q.1.1.**