



Food directorate  
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### **Submitted Via Email**

To Whom It May Concern:

### **RE: Comments to front-of-package nutrition labelling proposal**

On behalf of the Canadian Produce Marketing Association, it is my pleasure to provide comments to Health Canada's proposal to front-of-package nutrition labelling. We would particularly like to express our appreciation for the food directorate's decision to share the FOP nutrition labelling proposal with stakeholders and granting us an opportunity to provide additional comments.

### **About CPMA**

The produce industry generates over \$17 billion annually in economic activity throughout the supply chain and supports over 249,000 jobs across Canada. 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 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 today proud to represent over 850 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

### **Comments**

#### **1. 30% DV threshold**

- CPMA agrees with Health Canada's decision to loosen the definition for main dish, whereby a reference amount of food from two food categories is no longer required. Salad kits are a popular meal choice for many Canadians. A recent consumer tracking study by Numerator, showed that nearly 11% more Ontario households bought salad kits in the last quarter and salad kits are now purchased by almost one third of Ontario households. By allowing salad kits to fall into the 30% DV threshold category, Canadians are encouraged to continue choosing healthier convenience meal options.



- CPMA would like to clarify whether this 30% D.V. threshold applies only to single-serving salad kits with a reference amount of 200g or more (e.g. salad kit/bowl sold as a meal), or also to multi-serving salad kits (e.g. family-style salad kits)?

## **2. Aggregate nutrition labelling**

- More guidance is welcome on how FOP nutrition labelling will impact food that includes multiple products and displays multiple nutrition facts tables on the package. More specifically, if a company chooses to use aggregate nutrition labelling on their salad kits (e.g. separate NFT for dressing, lettuce, add-on's), how will FOP nutrition labelling be applied if the threshold for one food item (e.g. cheese) is surpassed, but not another (e.g. lettuce greens)?

## **3. Public education**

- CPMA works closely with registered dietitians across Canada, and more specifically with retail dietitians who can play a key role in educating Canadians about FOP nutrition labelling in a point-of-purchase setting. CPMA welcomes the opportunity to work with Health Canada in its national consumer education campaign.