



# CPMA Labelling Task Force

November 23, 2023



# Welcome and Opening Remarks

- Roundtable introductions
- CPMA labelling task force purpose
- CFIA labelling efforts

# Issue #1: Minimum type heights on consumer prepackaged products

- **Current regulation:**

- The labelling for country of origin, grade, size designation, and net quantity must meet a minimum type height on consumer prepackaged products ([SFCR, 229, 270, 312, 321](#)), that is based on the principal display surface (PDS) calculation in Schedule 6 of the SFCR.

## SCHEDULE 6

(Section 229, subsection 270(1), paragraphs 312(b), 320(1)(b), 321(c) and 324(a) and section 325)

### Minimum Type Size — Principal Display Surface

	Column 1	Column 2
Item	Area of Principal Display Surface (cm <sup>2</sup> )	Minimum Character Height (mm)
1	≤ 32	1.6
2	> 32 but ≤ 258	3.2
3	> 258 but ≤ 645	6.4
4	> 645 but ≤ 2 580	9.5
5	> 2 580	12.7

# Issue #1: Minimum type heights on consumer prepackaged products

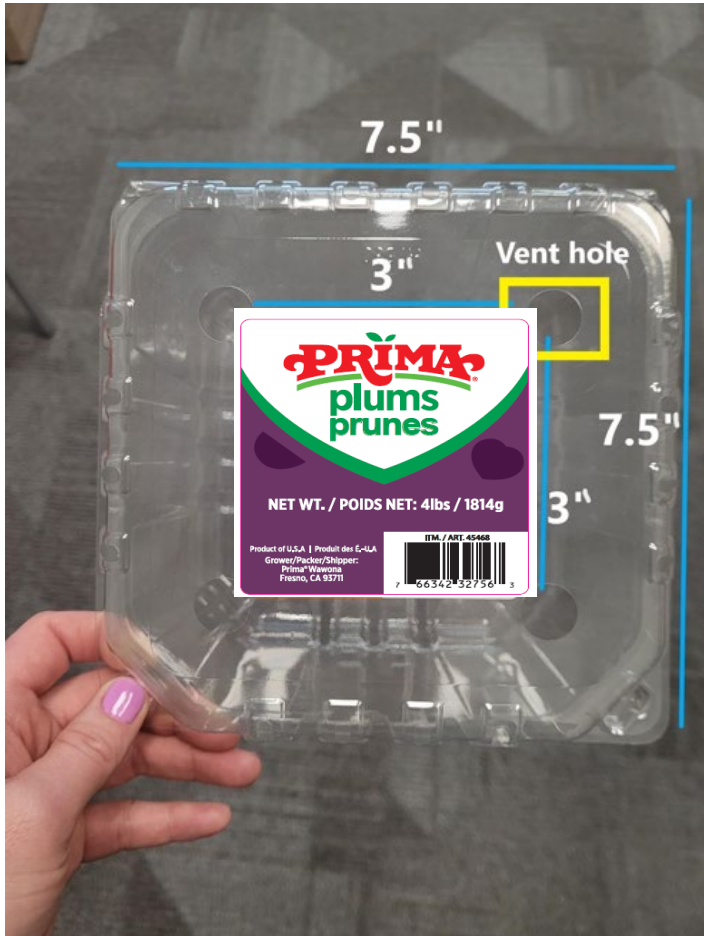
- **Problem:**

- This is a problem as the calculation **does not** consider places on a label where a label **cannot be physically applied**, such as vent holes and curved packaging.
  - Vent holes are needed for food safety and quality
- As a result, larger type heights are required on labels that have minimal labelling space. This can limit company branding and create a **competitive disadvantage**.





# Issue #1: Minimum type heights on consumer prepackaged products



Original label



Revised label to meet minimum type height requirements

# Issue #1: Minimum type heights on consumer prepackaged products

- **Problem:**

- Minimum type heights also hinder innovation in the produce industry.
- Example: Top-seal packaging is often used to increase shelf life. During retail inspections, allowing for more visual space to count product (e.g. strawberries) by the retailer is important.



Clamshell



Top-Seal

# Issue #1: Minimum type heights on consumer prepackaged products

- **CPMA labelling task force recommendation:**
  - Flexibility should be provided for minimum type height that depend on the principal display surface and consider areas where a physical label cannot be physically applied (e.g. vent holes, raised bumps).
  - CFIA could consider using the terms “clear, prominently shown, and readily discernible” on consumer prepackaged fresh fruits and vegetables to allow for innovation in packaging without compromising on food safety and competitiveness in the marketplace.

# Issue #2: Minimum type heights on shipping containers/cases

- **Current regulation:**

- The labelling for country of origin, grade, and size designation must meet a minimum type height on cases/shipping containers ([SFCR 270, 320, 321a](#)), that is based on the principal display surface (PDS) calculation in Schedule 6 of the SFCR.

## SCHEDULE 6

(Section 229, subsection 270(1), paragraphs 312(b), 320(1)(b), 321(c) and 324(a) and section 325)

### Minimum Type Size — Principal Display Surface

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**Problem:** Most shipping containers/cases are a size that require a 12.7 mm font size, for labelling items that are based on PDS





## Issue #2: Minimum type heights on shipping containers

- **Problem:**

- Many companies in the produce industry have adopted the use of a Produce Traceability Initiative (PTI) label on shipping containers/cases to track and trace product through the supply chain, where font sizes have been agreed upon by industry for legibility across the supply chain and in distribution centres in both the USA and Canada. These font sizes may not meet the prescriptive minimum type height requirements as per the SFCR.
- The PTI label will be more widely adopted in the industry with the implementation of the USDA FSMA 204 Traceability Rule.
- Minimum type heights on shipping containers does not exist in the US. Alignment is encouraged, to avoid an impact on trade.

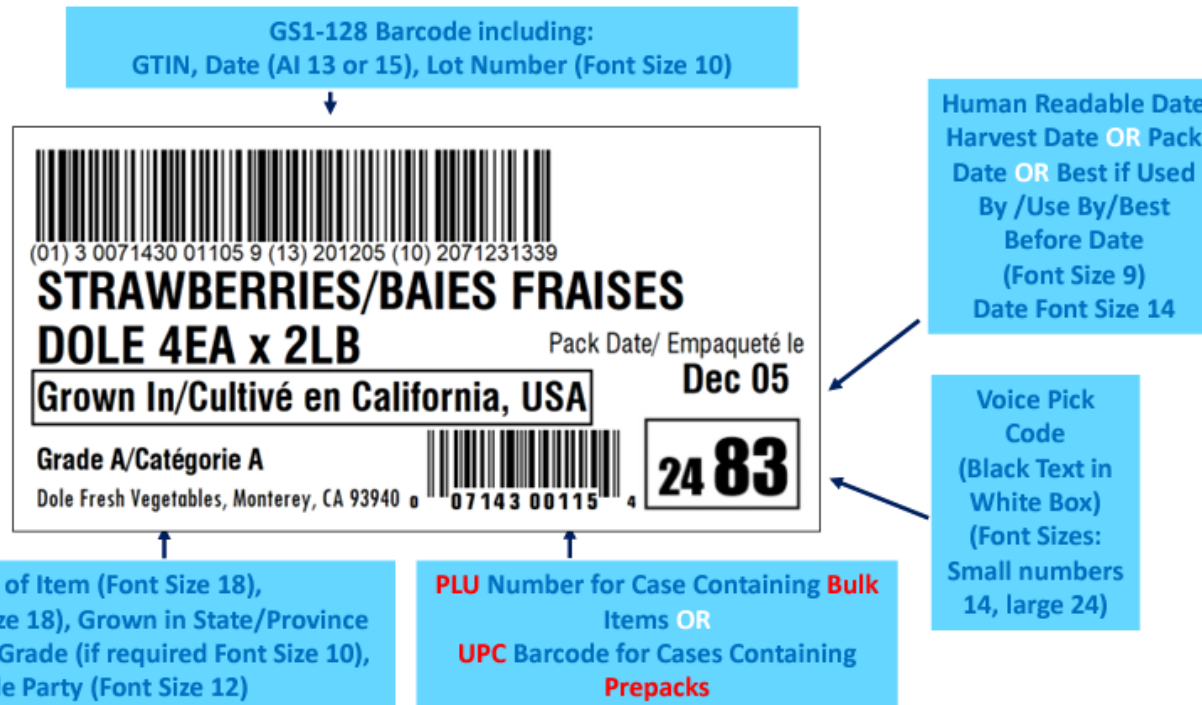


# Issue #2: Minimum type heights on shipping containers

## Sample Case Label:

(Please note font sizes used are in Swis721 Cn BT – If a different font is used please strive to maintain a similar size.)

**FINAL**



Font size	Type height (in mm)
9	2 mm
10	2.5 mm
12	2.8 mm
14	3 mm
18	4 mm
24	5 mm

These type heights are much smaller than the type heights in Schedule 6, where the largest type height is 12.7 mm

## Issue #2: Minimum type heights on shipping containers

- **CPMA labelling task force recommendation:**
  - CFIA could consider using the terms “clear, prominently shown, and readily discernible” for all labelling components on shipping containers/cases of fresh fruits and vegetables.

# Issue #3: Net quantity on consumer prepackaged products

- **Current regulation:**

- According to the SFCR, net quantity must appear on the label for consumer prepackaged products ([SFCR, 230](#)).
- The exemption from SFCR regulations ([213 b,c](#)) **does not** apply to fresh fruits and vegetables that are packaged in a:
  - Confining band that is **greater** than 13 mm (1/2 inch) in width or that have a tag attached; and
  - Protective, transparent wrapper or bag, that contains labelling information, **beyond** price, bar code, number code, environmental statement or protect treatment symbol
- This means a net quantity, as part of the SFCR labelling requirements, is required for these items

## Issue #3: Net quantity on consumer prepackaged products



- Examples of consumer prepackaged products that do not meet [SFCR 213 \(b,c\)](#) exemption



## Issue #3: Net quantity on consumer prepackaged products

- **Problem:**

- These items vary greatly by weight, given the nature of produce. It would be difficult to put a weight on these items.
- The use of terms like “1 bunch” and its French equivalent, does not add much value for consumers and takes up valuable labelling space on a label that is already small.

# Issue #3: Net quantity on consumer prepackaged products

- **CPMA labelling task force recommendation:**

- CPMA asks that an exemption be provided for net quantity labelling on consumer fresh fruit or vegetable products that are packaged in a:
  - confining that is **greater** than 13 mm (1/2 inch) in width or with a tag attached, or
  - protective, transparent protective wrapper or bag that shows information **beyond** a price, bar code, number code, environmental statement or product treatment symbol (SFCR 213 b, c)
- CPMA proposes that net quantity not be required, if the quantity is visible and identifiable, by consumers.

# Issue #4: Organic certification body on PLU stickers

- **Current regulation:**

- If an organic claim is made on a label accompanying a bulk product, such as on a sticker, then the name of the certification body must also appear on this label. Example: this applies to the use of organic claims and the organic logo on a Price Look-Up (PLU) sticker ([CFIA ILT](#))
- [SFCR 354](#) If an expression that is referred to in subsection 353(1) or (2) is shown on the label of a food commodity, the label must also bear:
  - **(a)** in the case of a food commodity that is sent or conveyed from one province to another, the name of the certification body that certified the food commodity as organic;
  - **(b)** in the case of a food commodity that is imported, the name of the certification body or the name of the entity accredited by a foreign state referred to in subparagraph 357(1)(a)(ii) or (iii) that certified the food commodity as organic;

# Issue #4: Organic certification body on PLU stickers

- **Problem:**

- This is a problem for PLU stickers, given their small size and the limited space present for labelling information.
- The name of the certification body is also not a requirement on PLU stickers in the USA and poses a trade barrier, as different PLU stickers need to be made for Canada, increasing their costs.
- This information is also a repetition of information that may already be available on the master case/shipping container, and where documentation and organic certificates can easily be pulled to prove authenticity.

# Issue #4: Organic certification body on PLU stickers

**Problem:** Small size and limited space on PLU stickers





# Issue #4: Organic certification body on PLU stickers

- **CPMA labelling task force recommendation:**
  - CPMA asks that an exemption be provided on PLU stickers, to not require the name of the certification body when an organic claim is made on a PLU sticker. The exemption should include language to ensure the certifying body is available in sellers' records should CFIA require the information.

# Other topics



- **Non-GMO labelling**

- **Issue:** The omission of an explanatory statement when a non-GMO logo appears on produce can create consumer fear and pose unintended consequences.
- **CPMA labelling task force recommendation:** We ask that non-GMO logos be treated as non-GMO claims and require an explanatory statement if present on a fresh fruit or vegetable that has had no genetically engineered strains for sale



# Other topics

- **Cucumber labelling**
  - **CPMA labelling task force recommendation:** In addition to the extension of the low-priority approach for labelling inspections, we ask that greenhouse-grown cucumbers be exempt from SFCR labelling requirements in the next iteration of the SFCR.



# Other topics

- **Transition period timelines**

- Transition periods that impact labelling when new regulations are released needs to be standardized across the Canadian government.
- For example, a new grade standard for greenhouse miniature seedless cucumbers was provided with **only a 6-month transition period**. This is too short of a timeline as labelling is impacted.

# Next steps