



The Honourable Kody Blois  
Minister of Agriculture and Agri-Food  
House of Commons  
Ottawa, ON K1A 0A6

Submitted Via Email : [aafr.info.aac@agr.gc.ca](mailto:aafr.info.aac@agr.gc.ca)

**Subject: Support for Labelling and Grade Modernization for Fresh Produce**

Dear Minister Blois,

On behalf of Canadian Produce Marketing Association, we would like to extend our sincere congratulations on your appointment as Minister of Agriculture and Agri-Food. We are pleased to have a Minister who has such a deep understanding of the fresh produce sector and who has made significant contributions to fresh produce in your previous roles – we look forward to working with you and your office.

We welcomed your recent public statement regarding the need to remove outdated, prescriptive labelling requirements for fresh fruits and vegetables and to modernize Canada's fruit and vegetable grade standards in collaboration with the Canadian Food Inspection Agency (CFIA). Your recognition of these issues underscores an understanding of the pressures faced by the fresh produce industry and sets the stage for meaningful progress. We welcome the opportunity to work collaboratively with you and your team as this important work moves forward.

In support of your efforts, we would like to share a list of key labelling irritants that our members have consistently identified as barriers to efficiency, trade, and regulatory alignment, and which do not provide any benefit for the health or safety of the Canadian food supply:

1. **Net quantity requirement on bulk produce that is considered “consumer prepackaged” due to their packaging:** According to the *Safe Food for Canadians Regulations (SFCR)*, net quantity must appear on the label for consumer prepackaged products ([SFCR, 230](#)). Fresh fruits or vegetable that are packaged in a confining band that is greater than 13 mm (1/2inch) in width or that have an additional tag attached or in a 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](#)), are considered consumer prepackaged products (e.g., bunch of bananas with label that is > 13 mm (1/2inch), bunch of herbs with a tag, wrapped cauliflower with a brand). This means, a net quantity is required on the label. This is problematic as these items vary greatly by weight, given the nature of produce. Not only would it be difficult to put a weight on each item but using a term like “1 bunch” or “1 cauliflower” and its French equivalent, does not add much value for consumers as the quantity is apparent and the information takes up valuable labelling space on an already small label. Additionally, in the USA, a net quantity is not required on these types of bulk produce items, and poses a potential trade barrier.

2. **Minimum type height on consumer prepackaged products:** 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. In the produce industry, smaller labels are often used and applied to packaging (e.g. label applied to tray of corn, label applied to clamshell of strawberries). This makes it difficult for companies to meet the minimum type height requirements, as the PDS is often larger than the label size and the PDS does not remove areas that cannot be physically labelled (e.g. vent holes, raised bumps, etc.) Smaller labels are commonly used for various reasons, such as: allowing consumers to see the product, cost savings, sustainability purposes, allowing for more visual space for retailer to count product, and physical limits such as vent holes (which improves the quality and food safety of produce during transport) and raised bumps on packaging. When large type heights are required, it poses a challenge for industry, who may be forced to fit in all the required information on a label, or decrease the space allocated for company branding, and hence, create a competitive disadvantage. This creates barriers to packaging innovation and to industry compliance, without enhancing consumer protection or food safety.
3. **Minimum type height on shipping containers (North American Harmonized Labels):** As part of an effort to standardize the information shared on cases of fresh produce to comply with regulatory, business and traceability requirements in Canada and the U.S., the fresh produce industry developed a harmonized case label



that includes all of this information enabling a “label once, ship anywhere” approach for the North American market. The current Canadian requirements for minimum type height on country of origin, grade, and size designation labelling on cases of fresh produce pose a significant compliance challenge given the limited “real estate” on the standard case label. It is likely that most cases of fresh produce in Canada are currently out of compliance with this unnecessary and prescriptive requirement in their efforts to meet much more important information requirements (e.g. country of origin, responsible party, traceability information, etc.) There is also concern that the minimum type height requirements for cases/shipping containers would result in bigger labels being required and add multiple costs (e.g. labels, equipment, etc.), pose food safety concerns (e.g. stickers being easily washed off on reusable plastic containers), and create operational issues (e.g. bigger labels printed in field could be destroyed) for the industry.

4. **Organic Certification Body requirements on PLU stickers (ie. the stickers used to identify loose/bulk produce at point-of-sale):** When an organic claim is made on a fresh fruit and vegetable, the requirement is that the name of the certification body who certified the product as organic, also be present ([CFIA industry labelling tool: Organic](#)). This is not only the case for prepackaged fresh fruits and vegetables, but also for fresh fruits and vegetables with PLU stickers sold in bulk. 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](#)). 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. One of the major Canadian retailers also mentioned how when an inspection takes place by CARTV, Quebec’s provincial level enforcers and the product is deemed ‘non-compliant’, they are forced to dump the product, creating unnecessary food waste.



We believe that addressing these issues through a modernized, risk- and outcome-based approach to labelling would reduce unnecessary burden while ensuring continued consumer trust and regulatory alignment, both within Canada and with key trading partners.

We would welcome the opportunity to engage further with your office and CFIA on these matters. Thank you once again for your leadership and commitment to supporting a thriving and dynamic Canadian fresh produce sector.

Warm regards,

A handwritten signature in black ink, appearing to be 'R. Lemaire', followed by a horizontal line.

Ron Lemaire  
President  
Canadian Produce Marketing Association