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March 24, 2023  
Submitted Via Email [Codex\\_Canada@hc-sc.gc.ca](mailto:Codex_Canada@hc-sc.gc.ca).

To Whom It May Concern:

**RE: Request for comments on the discussion paper on sustainability labelling claims**

#### **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 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 over 850 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

#### **General comments**

- 1. Whether Codex Committee on Food Labelling should initiate new work on sustainability-related labelling (does the discussion paper provide sufficient information to support new work);**

CPMA supports the Codex Committee on Food Labelling (CCFL) proposed work on sustainability-related labelling. A recent study from Cargill found that 55% of global consumers are more likely to purchase packaged food items that are labelled with a sustainability claim—an increase of four points from the previous year<sup>1</sup>.

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<sup>1</sup> [Cargill, 2022](#)

There is an increasingly pressing demand for some form of sustainability-related accountability, leading to a growing number of standards aiming at certifying sustainability claims, whether practice- or outcome-based. Standards are often designed to address specific concerns, resulting in a landscape of partial and partly overlapping frameworks. Buyer expectations may include meeting a particular standard in addition to other requirements to meet sustainability targets. This leads to organizations having to comply with a set of different standards to substantiate the very same practices or outcomes, multiplying the cost incurred without much value added.

At the same time, the scope and meaning of the term “sustainability” are ever-changing, driven by the progress of scientific knowledge, innovation, and shifting social norms and values. Consequently, it is anticipated that sustainability standards will evolve and may continue to multiply, in conjunction with a growing need for harmonization to improve efficiencies throughout the value chain.

Sustainability claims could potentially allow consumers to differentiate with greater ease between products on the market, so they can make better purchasing decisions concerning the environment. In turn, consumers' purchasing power for such products is a market driver for businesses to invest in more sustainable environmental practices.<sup>2</sup>

However, the way in which sustainability is defined will vary depending on the standpoint, based on the entity (a product, organization, or value chain), the geography (global vs. regional vs. local), and the dimensions considered (financial, environmental, social, governance, and nutrition). This leads to a key challenge at the heart of effective sustainability labelling: without standardized definitions relative to the use of terms such as “sustainable”, “sustainably grown”, “sustainably produced” and others, sustainability labelling could at best be considered misleading to consumers and at worst become an avenue for deliberate “greenwashing”. Therefore, if CCFL begins work on sustainability labelling, the first task must be to agree to definitions of terms which can be used on consumer labelling. In the absence of this standardized guidance, Codex efforts will be rendered futile.

CPMA acknowledges that many definitions of sustainability exist. CCFL’s current definition of sustainability is based on the United Nations Brundtland Commission, which defines sustainability as "Meeting the needs of the present without compromising the ability of future generations to meet their own needs." This is a very broad definition and therefore inappropriate for use in governing consumer claims.

**2. That such work should be limited to high-level guidance and principles for developing sustainability-related labelling on food**

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<sup>2</sup> [Innovation, Science And Economic Development Canada](#), 2008

CPMA is generally supportive of the development of high-level guidance and principles for developing sustainability-related labelling on food, which fits within the CCFL's mandate to draft provisions on food labelling that apply to all foods and to study issues related to food labelling, such as:

- (a) to draft provisions on labelling, and definitions, applicable to all foods;
- (b) to consider, amend if necessary, and endorse draft-specific provisions on labelling prepared by the Codex Committees drafting standards, codes of practice and guidelines;
- (c) to study specific labelling problems assigned to it by the Commission; and,
- (d) to study problems associated with the advertisement of food with particular reference to claims and misleading descriptions.

As noted above, CPMA emphasizes that the first step in any such effort must be to define the terms under consideration/acceptable as consumer claims. This would help ensure a clearer understanding of how to substantiate claims per the *General Guidelines on Claims* and support science-based sustainability-related labelling claims. The establishment of principles to assist governments (or other stakeholders) in developing, implementing, or regulating sustainability-related labelling will facilitate harmonization between trading partners and establish a foundation for national legislation and/or regulations.

CPMA also emphasizes that the Government of Canada should ensure that sustainability labelling requirements for Canada should reflect the guidance and principles established by this Codex work to ensure consistency and minimize the potential downstream impacts on the cost of food resulting from Canada-specific requirements.