

Codex Point of Contact for Canada
Food Directorate, Health Canada
Room C416
Tunney's Pasture
Ottawa, ON K1A 0K9

September, 20 2024

Submitted Via Email to Codex_Canada@hc-sc.gc.ca

RE: request for comments (through Circular Letters) on 4 agenda items for the 48th Session of the Codex Committee on Food Labelling (CCFL).

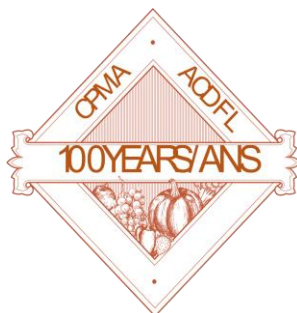
To Whom It May Concern,

On behalf of the Canadian Produce Marketing Association, it is my pleasure to provide comments to inform the Government of Canada's contribution to the Codex discussion on food labelling, and specifically to the discussion paper on sustainability labelling.

About CPMA

The produce industry generates over \$15 billion annually in economic activity throughout the supply chain and supports over 185,400 jobs across Canada. Based in Ottawa, 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 880 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Sustainability is a core focus area for many across the fresh produce supply chain. CPMA is pleased to contribute to the government's considerations related to sustainability labelling. We are committed to supportive innovative and environmentally responsible solutions that promote sustainability and public trust in the food industry.



Comments

CPMA agrees that the Codex Committee on Food Labelling's (CCFL) recent changes and suggestions to ensure that claims are meaningful and not misleading as outlined in the rationale in Table 1¹ are a positive step forward, addressing key issues and improving the overall framework. We anticipate that these key changes reflect a growing awareness in terms of environmental issues and a commitment to minimize labelling issues within the industry.

CPMA would like to reiterate that it is crucial to establish a clear, standardized and consistent definition of the term "sustainability". Without this clarity, the guidelines risk being interpreted inconsistently, leading to a misalignment of General Guidelines or any sustainability-related labelling claims. This is especially the case given leading sustainability frameworks and related definitions seek to address social, economic and environmental considerations as well as prevent avenues for "greenwashing" – a complexity which risks hindering the effectiveness and accuracy of future food labelling.

The fresh produce industry is among the most globally integrated supply chains in the world. In fact, due to climatic realities and our shorter growing season, \$4 out of every \$5 spent on fresh produce in Canada is spent on imported product. CPMA therefore 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 and availability of food resulting from Canada-specific requirements.

We thank you for the opportunity to share these comments and for your consideration.

Sincerely,

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

Ron Lemaire
President
Canadian Produce Marketing Association



CPMATM
ACDFL^{MC}

CPMA ACDFL
CANADIAN PRODUCE MARKETING ASSOCIATION
ASSOCIATION CANADIENNE DE LA
DISTRIBUTION DE FRUITS ET LÉGUMES

¹ [JOINT FAO/WHO FOOD STANDARDS PROGRAMME - DISCUSSION PAPER ON SUSTAINABILITY LABELLING CLAIMS](#)