



Food Labelling Modernization Initiative Engaging on Ways to Modernize Food Labelling

Introduction

The Canadian Food Inspection Agency (CFIA) is continually evolving to meet the challenges of a complex and ever-changing food environment, one that continues to promote food safety, public health, consumer protection and a fair marketplace.

The [Food Labelling Modernization \(FLM\) initiative](#) is part of the CFIA's modernization and agency transformation initiatives. Its objective is to develop a more modern food labelling system within CFIA's mandate that responds to current and future challenges, by engaging stakeholders and linking with other modernization initiatives.

As part of the second phase of FLM engagement, this online questionnaire is intended to gauge the level of support for and collect comments on the proposals to modernize Canada's food labelling system. It builds on what we heard from you during our first phase of engagement in 2013, and from our engagement in early 2015.

To understand the issues that we are trying to address, it is important that you read these documents before completing the questionnaire:

- [Discussion Paper for Food Labelling Modernization – Phase II](#)
- [Food Labelling Modernization Engagement Summary Report on Key Issues – June 2014](#)

This questionnaire has three parts:

1. **Background on the Food Labelling Modernization initiative**
2. **Demographic Information** to help us better understand your perspective;
3. **Key Issues and Proposals** – a brief background and current requirements, what we heard from stakeholders, proposals for discussion, and a series of questions under each area of focus:
 - A. Regulations (6 themes)
 - B. Service Delivery
 - C. Policy Development
 - D. Roles and Responsibilities

On average, it should take approximately 45 minutes to complete the questionnaire.

Please answer all questions and provide your comments where appropriate. Include examples in your comments if you can. If you have no comments, please put N/A in the box to allow for you to continue with the rest of the questionnaire.

You can save your feedback and return to the questions at any time by clicking on the “save” button at the end of each section.

The questionnaire will remain open until **June 30, 2015.**

For more information about this initiative, please visit www.inspection.gc.ca/labelling or email CFIA-Modernisation-ACIA@inspection.gc.ca



Background on the Food Labelling Modernization Initiative

The Canadian Food Inspection Agency (CFIA) and Health Canada (HC) are working together to modernize food labelling. Health Canada, with support from CFIA, is modernizing the Nutrition Facts tables, legibility of ingredients lists, and sugar labelling. CFIA, with HC involvement, is modernizing other labelling regulations, as well as the way we deliver services and develop policies and programs.

The CFIA is seeking your input so that we can get a balanced perspective from all stakeholders on ideas to improve our food labelling system. This will help us to do the following:

- protect Canadians, while enhancing opportunities for industry to be competitive;
- improve access to information about food labelling to increase consumer's awareness and help them make informed decisions about the food they buy for themselves and their families; **and,**
- prepare for the future, that will allow us to respond more effectively to consumer, industry and government needs in the area of food labelling particularly as it relates to CFIA's mandate.

The Food Labelling Modernization initiative was launched in June 2013. In November 2014 the CFIA posted the [FLM Engagement Summary Report on Key Issues](#) which identifies what was heard from Phase I engagement. FLM is closely linked with other modernization initiatives.

Health Canada, with CFIA support, engaged stakeholders on modernizing food labelling, particularly on the way nutrition information is presented on food labels. HC and CFIA posted a joint [What we Heard Report](#) in June 2014.

- This initiative will improve nutrition information available to consumers.
- Specific changes include the format of the nutrition facts table, serving size guidelines, and how nutrients, such as sugar, are presented.

CFIA's Regulatory Modernization, with HC support, is developing the supporting regulations to bring CFIA's [Safe Food for Canadians Act](#) into force. The Act received Royal Assent in 2012. The supporting *Safe Food for Canadians Regulations* will, among other things:

- reduce duplications and complexity of labelling requirements, a key stakeholder issue; **and,**
- improve consistency and strengthen consumer protection.

Based on what we heard from you and other stakeholders such as consumers and industry, we have developed proposals to address your key food labelling issues. These proposals are based on:

- issues, reports and studies you shared with us;
- Codex Alimentarius and other recognized standards, codes of practices, and guidelines;
- alignment with other modernization initiatives such as Health Canada's nutrition labelling, legibility of ingredients list and grouping of sugars; **and,**
- alignment with trading partners and analysis of other countries' regulations and best practices.



While the Food Labelling Modernization initiative will concentrate only on the areas within its focus, we will direct any comments or issues that fall outside of this focus to the appropriate government organization, as needed. We will continue to work with Health Canada and other government organizations to align our modernization initiatives.

The feedback we receive from stakeholders will be compiled and analyzed with all comments we receive and we will share a report of what we heard.

Any possible future recommendations that require regulatory change would follow the normal Canada Gazette process and include further consultations. If any of the recommendations lead to regulatory changes, these will follow the regulatory process, including Canada Gazette publications. The CFIA and Health Canada will endeavor to align the coming into force date for label changes.



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Alternatively, individuals may contact the Canadian Food Inspection Agency's Access to Information and Privacy Office at ATIP-CFIA-AIPRP@inspection.gc.ca (located at 1400 Merivale Road, Tower 1, Room 0-149 Ottawa, ON K1A 0Y9, Canada), for access to their personal information pursuant to the provisions of the *Privacy and Access to Information Acts*.

I have read, I understand and I agree with the privacy notice stated above.



1. Please select the perspective from which you will be answering the survey.

- Industry (Canadian manufacturing)
- Industry (import or export)
- International stakeholder (outside of Canada)
- Industry association
- Consumer / general public
- Consumer association
- Health professional
- Health association
- Academia / research / consulting
- Government – federal
- Government – provincial, territorial, other
- Government – outside of Canada
- Other, please specify

Other:

2. Please indicate where you live, or if answering from the perspective of an organization or business, where your organization or business is primarily located.

- Alberta
- British Columbia
- Manitoba
- New Brunswick
- Newfoundland and Labrador
- Northwest Territories
- Nova Scotia
- Nunavut
- Ontario
- Prince Edward Island
- Quebec
- Saskatchewan
- Yukon
- Other country, please specify

Other:



3. If you are part of a business or an organization, how many employees or members does your organization represent?
- 1 to 4 employees/ members
 - 5 to 99 employees/ members
 - 100 to 499 employees/ members
 - 500 to 4999 employees/ members
 - 5000+ employees/ members
 - Not applicable
4. If you are answering from the perspective of an industry or an association, which of the following commodities best represent your areas of interest?
- Dairy products
 - Meat and/or poultry products
 - Processed fruits and/or vegetables
 - Fresh fruits and/or vegetables
 - Egg and egg products
 - Fish, seafood and/or marine products
 - Grain and/or bakery products
 - Alcoholic beverages
 - Bottled Water
 - Fats and/or oils
 - Honey and/or maple products
 - Sugar and/or sweetening agents
 - Cocoa, chocolate and mixed nuts
 - Coffee and/or tea
 - Spices, herbs, seasonings and/or dressings
 - Flavouring preparation and/or food colours
 - Salt, baking powder and/or vinegar
 - Not applicable



5. While not required, please provide us with your contact information so that we may contact you if we have questions or need more details.

Name

Title (if applicable)

Company or
organization (if
applicable)

Street address

City/Town

Province/State

Postal Code/ZIP

Country

Email

Telephone



Key Issues and Proposals for Modernizing Food Labelling

The following outlines proposals for modernizing the food labelling system. The questionnaire is divided into the four key areas of focus, starting with regulations.

A. Food Labelling Regulations

In Canada, effective legislation for food safety and consumer protection is the cornerstone of an efficient and innovative food labelling system.

Food labelling regulations protect consumers by ensuring that key information is available in order to help them make informed food choices. Industry is also protected by fair and consistent marketplace requirements. The core mandatory labelling information required on food products must be legible, bilingual (with some exception) and include the following:

- what the food is, or “common name”
- what the ingredients are, or “list of ingredients”
- what the nutrition information is, or “Nutrition Facts table”
- who is responsible for the food, or “dealer name and address”
- how much food there is in a package, or “net quantity”
- how long the food stays fresh, or “best before date”
- For some food, where it comes from, or “country of origin”

See the [Online Labelling Tool](#) on the CFIA website for a review of the key labelling requirements.

The size of the letters, and numbers for net quantity, and where the information appears on the label (or its placement), are specified for some but not for all labelling information.

In addition to labelling requirements, there are also food standards. These are regulations that describe what ingredients a particular food, with a specific name, must contain, or what ingredients may be added, and, in some cases, how it should be made. Some examples of food products covered by specific food standards are vegetable oils, bread, pickles, wine, and spices.

We are proposing six areas of change to labelling related regulations, for discussion.

A1. Enhancing “best before date” labelling

Currently, the “best before” date

- Must appear on prepackaged food products that have a durable life of 90 days or less, such as milk, yogurt or bread;
- Is voluntary for prepackaged products with a durable life longer than 90 days;
- Current format is month and day, with the month as two letters and the day as numbers, such as “JN 28” for June 28th; and
- The year may be included, but is not required.

What we heard: The format and location should be consistent. It should be clear and visible (not on lids). It can be confused with code dates. It should be mandatory on all or more products.

Proposals for discussion:

Consistent with discussions underway at the Codex Committee on Food Labelling, an international standard setting body of which Canada is a member, we propose to improve the format to:

- Allow flexibility to use a numerical date, which means the option of using any one of the proposed formats presented below (including the order format, such as “dd/mm/yy”), and
- Always include the year.

Companies could show the best before date on the label using one of the following proposed options, with additional flexibility in the order of the day, month, and year:

A1 Proposals for Discussion

Current	Proposed
Best before/meilleur avant JN 28	Best before/meilleur avant 2015 JN 28 or Best before/meilleur avant 28/06/15 - dd/mm/yy jj/mm/aa or Best before/meilleur avant 15 JN 28 - yy/mm/dd aa/mm/jj

Based on what we heard, we also propose to review the current exemptions to best before date requirements. The following foods are currently exempt from the requirement to be labelled with a durable life date or packaging date [B.01.007(3), FDR]:

- Foods with a shelf life longer than 90 days, such as canned goods;
- Prepackaged fresh fruits and vegetables (including prepackaged, chopped or shredded fresh fruit and vegetables);
- Prepackaged individual portions of food served by restaurants, airlines or other commercial enterprises with meals or snacks (e.g., milk, cheese packets - as they are intended for immediate consumption);
- Prepackaged individual servings of food prepared by a commissary* and sold in automatic vending machines or mobile canteens (e.g., sandwiches); and
- Prepackaged donuts.

*commissary includes any establishment that packs foods for sale in vending machines or mobile canteens.

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to modernize best before date labelling?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Should foods that have a shelf life of greater than 90 days remain exempt from best before dating? Which other types of foods should require a Best before date?

Limit of 250 words.

4. Do you have any other ideas, comments, or considerations on modernizing best before dating?

Limit of 250 words.

A2. Improving ingredient list class names

Class names in the list of ingredients came into place in Canada in 1975, with updates related to dairy ingredients and sugars in 1992. These are names used for a group of similar ingredients, such as “vegetable oil”, “flavour”, or “milk ingredients”. For example, the class name “milk ingredients” can be used to represent a group of ingredients that includes buttermilk, butter oil, milk fat, cream, and skim milk among others.

[Class names](#) are intended to provide flexibility for industry and to reduce the length of the ingredient list while still providing meaningful information to consumers about the foods they are buying.

What we heard: Consumers told us they want more ingredients listed and the ingredients list to be clear and understandable. Industry identified trade consistency issues with specific class names. We heard that class names should provide clear information to consumers and be revised so that ingredients are not hidden.

Proposals for discussion:

We propose to improve specific “class names” and what ingredients are included in them to meet the needs of consumers and industry. We propose to do this by:

- expanding or revising class names to provide more details about the ingredients that are added to foods; and
- aligning with rules used by international trading partners and CODEX.

A2 Proposals for Discussion

Class Names	Proposals for discussion
“sugar/glucose-fructose”, “vegetable oil” and “seasonings”.	Remove the class names so all ingredients and/or components will be listed out by their specific common names.
“milk ingredients” and “modified milk ingredients”, “sugar”, and other fats and oil class names such as hydrogenated oil, spices and herbs.	Review and modernize the names and what can be included in them.
“glucose-fructose” and “fructose syrup”	Review the names to confirm they are still relevant, or look at adopting “high fructose corn syrup”, the term used in the United States (US)
“flavour”, and “artificial flavour”, “simulated flavour, or “imitation flavour”	Expand the class name categories for flavours by including new class names such as “natural flavour”.

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to modernize ingredient list class names?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Do you have any other ideas, comments or considerations on modernizing ingredient class names?

Limit of 250 words.

A3. Improving the legibility and placement of information

Under current regulations, mandatory information is required to be displayed on the label in a *prominent and clear way*. Some core mandatory information has specified type heights for the letters, for example, 1.6 millimeters (mm) based on the lower case “o” for the name of the food and the dealer name and address. However, this is not the case for all labelling requirements, such as the ingredients list, best before date, and country of origin labelling. For smaller packages, such as those that have a principal display surface of 10 square centimeters or less, the letters must be at least 0.8 mm high.

To improve legibility of labelling information, Health Canada is currently proposing changes to the Nutrition Facts table and list of ingredients.

What we heard: The type size for list of ingredients and common name should be increased. It is difficult to read information off shiny surfaces. Some recommended white backgrounds and that mandatory requirements should have a consistent location on the label.

What we propose for discussion:

Building on the legibility work of Health Canada and current requirements, we are proposing to make the core mandatory labelling information easier to find, read and understand. We propose to:

Make the [common name](#) more prominent and easier to read and find on the label. We propose that all words in the common name:

- a) be in bold type, using upper and lower case letters (e.g. **Strawberry Jam**);
- b) be prominent in relation to any other information shown on the main panel by having a type size of:
 - o no less than 1.6 mm based on the lower case “o”; and
 - o no less than ½ the size of the largest print of other information on the main panel;
- c) be words of the same font, colour and prominence;
- d) have adequate contrast between the common name and the background;
- e) be shown in a consistent location, e.g., within the upper ½ of the main panel; and
- f) be grouped together.

Make other labelling information, such as the dealer name and address, best before date and storage instructions, and country of origin labelling, more prominent and easier to read and find in a predictable location on the label. We propose that other labelling information:

- a) be in a type size of not less than 1.6 mm based on the lower case “o” (unless otherwise specified);
- b) be in upper and lower case letters;
- c) have adequate contrast between the information and the background; and
- d) be shown in a consistent location (for example: grouped with the list of ingredients).

Make the [country of origin labelling](#) format and location more consistent across all products (where this information is required). We propose that this information:

- a) use consistent wording (e.g. “Product of (naming the country)” ; and
- b) be shown in a consistent location (e.g., on the principal display surface or adjacent to the dealer name and address).

Understanding the constraints for smaller size packages, we propose to have considerations for the legibility and placement of information on the label of these foods.

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to modernize legibility?

- o 1
- o 2
- o 3
- o 4
- o 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Do you have any other ideas, comments or considerations on ways to improve legibility and location of information required on a food label?

Limit of 250 words.

A4. Enhancing the Dealer Name and Address

The [dealer name and address](#) identifies the responsible party for a food product. In Canada, only the company name, city and province, or city and country are required. These requirements have not been updated since they came into place in the 1970s.

What we heard: The contact information for the dealer name and address should reflect modern ways for consumers to directly contact companies.

Proposals for discussion:

Taking into account modern ways to communicate and building on requirements of our trading partners such as the United States, New Zealand and Australia, we propose to enhance the dealer name and address requirements to include either a **postal code** or **telephone number, or email** so that consumers can more easily contact companies directly about their foods. Companies could label with one of the following proposed options:

A4 Proposals for Discussion

Example of current requirement	Proposed options
ABC Co. Toronto, Ontario	ABC Co. Toronto, Ontario M5S 1TY or ABC Co. Toronto, Ontario 1-800-777-8888 or ABC Co. Toronto, Ontario abcco@company.com

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to dealer name and address?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Do you have any other ideas, considerations or comments on enhancing the dealer name and address?

Limit of 250 words.

A5. Improving information on key ingredients emphasized through claims or pictures

In Canada, claims on foods that highlight the presence of key or premium ingredients must be presented in a manner that is truthful and not misleading. Currently, the CFIA uses the highlighted ingredient guidelines to interpret if a highlighted ingredient claim is truthful and not misleading.

In principle, any highlighting or emphasis regarding the presence of an ingredient, component or substance should be accompanied by a statement regarding the amount of that ingredient, component or substance present in the food.

What we heard:

Stakeholders have indicated that:

- There is inconsistent interpretation and understanding of highlighted ingredient claims on labels or advertisements to assess whether truthful or misleading.
- The list of ingredients does not let consumers know how much of a specific ingredient is in the product when a claim is made such as “made with fruit”.

- Consumers cannot easily compare products with similar ingredient lists when ingredients are highlighted.

Proposals for discussion:

Building on the labelling requirements used in other countries like the United States, United Kingdom, New Zealand, and Australia, as well as the European Union, we propose to require the amount of any ingredients that are emphasized or highlighted on a label through words or picture, as a percentage in the ingredient list. This is not a proposal to require the percentage of all ingredients, only the percentage of those that have been highlighted such as through claims.

The declaration will provide consumers with information on how much of the highlighted ingredients are actually in the product as a percentage of the whole food and will allow consumers to compare similar products side by side. For example, consumers could compare cereals that highlight whole grains and see the percentage of whole grains contained in each one and make more informed purchasing decisions.

A5 Proposals for Discussion

Example of current label - Highlighted ingredient in a claim	Example of proposed label - includes % amount of highlighted ingredients in the ingredient list
<div style="border: 1px solid black; padding: 10px;"> <p>Brand A Cookies, “made with blueberries” Ingredients: Enriched Flour, Sugar, Water, Blueberries, Canola Oil, Eggs, Baking Powder, Salt, Flavour.</p> </div>	<div style="border: 1px solid black; padding: 10px;"> <p>Brand A Cookies, “made with blueberries” Ingredients: Enriched Flour, Sugar, Water, Blueberries (5%), Canola Oil, Eggs, Baking Powder, Salt, Flavour.</p> </div>

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to improve information to consumers on key ingredients in food that are emphasized through claims or pictures?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Do you have other ideas, comment, or considerations on improving the information to consumers on ingredients that are emphasized or highlighted on labels or in advertisements?

Limit of 250 words.

A6. Modernizing Food Standards

Food compositional standards or “food standards” is a set of established requirements in Canadian food regulation, usually including the ingredients and processes that identify a particular food and often also set out the name of that food. Standards use technical specifications and other criteria such as composition, strength, potency, purity and quality, to establish a baseline for what a food shall or may contain. Standards also provide specifications regarding nutritional quality and, in some cases, food safety.

The CFIA and Health Canada share responsibility for food standards. There are currently more than 500 food standards for 20 food commodities. Examples of foods with standards include milk, bread, wine, pickles and chocolate.

What we heard: Outdated standards are a barrier to trade, stifle innovation, limit consumer offerings and contribute to administrative burden. It is difficult to update or amend food standards in a timely manner.

Proposals for discussion:

Working in collaboration with Health Canada and Agriculture and Agri-food Canada (AAFC), we will develop a plan that will lead to food standards that are modern and keep pace with industry and consumer needs. We propose the following approach:

- Identify which standards are out of date and need to be amended or are no longer required;
- Partner with stakeholders and use a transparent process for amending standards according to readiness;
- Use modern regulatory tools, such as “Incorporation by Reference”¹; and
- Explore other ways to meet the objectives of some standards, such as labelling requirements for amount of ingredients, or using industry codes of practice.

Any possible future recommendations that require regulatory change would follow the normal Canada Gazette process and include further consultations.

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for the proposed approach to modernize food standards?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. Thinking about the commodities that represent your areas of interest:

a. What food standard(s) limit innovation and require updating? Briefly describe what changes are required and a rationale.

Limit of 250 words.

b. What food standard(s) are no longer needed and should be removed? Please identify the specific regulation(s) and provide a rationale.

Limit of 250 words.

c. What food standard(s) could be collapsed or combined to make a generic standard? Please identify the specific regulation(s) and provide a rationale.

Limit of 250 words.

d. Are there any standards that could be replaced through other means, such as codes of practice or labelling and, if yes, what alternative means could be used?

Limit of 250 words.

4. In order for CFIA to identify engagement opportunities with industry who may be interested to modernize particular standards of identity, the CFIA would like to gauge and understand the state of readiness of the industry commodity sector. Fully ready means having agreement within the commodity sector on the changes to standards and a proposal for amendment that has been agreed to.

a) Keeping your commodity sector and food standards in mind, are your members, and any other related associations, ready to start making amendments to the standards?

- Yes
- No

b) If your members, and other interested associations, are not ready at this time, would you be ready in (check one):

- 1 to 3 years
- 3 to 5 years
- more than 5 years

Other

B. Service Delivery

The CFIA provides a variety of services to consumers, industry and other government departments in the enforcement of Canada's fair packaging and labelling laws. Some examples of these services are:

- promoting compliance to industry and consumers, through [the online labelling tool](#);
- conducting inspections;
- following up on complaints; and
- providing inspector training and information sessions.

What we heard:

CFIA's and HC's websites have labelling information in too many different places and they need to be updated and organized better. CFIA's Online Labelling Tool (OLT) was announced in June 2014 by the Minister of Health, the Honourable Rona Ambrose. Although industry and consumers have web access to labelling information that is centralized, easy to find, and accessible, some stakeholders would like further enhancements to make the tool more user friendly and modern.

Industry also said they need more training and awareness of labelling requirements to promote compliance. Consumer education on labelling will help them make informed decisions.

Stakeholders indicated that inspection and enforcement of labelling requirements could be more consistent and transparent. In addition, the inquiries and complaints process could be more efficient and timely.

Proposals for discussion:

We propose to:

- Enhance the Online Labelling Tool by linking with Health Canada's tools and education materials. Consult stakeholders on how to enhance these tools for better consumer awareness and industry training.
- Enhance focused compliance promotion efforts within priority areas by working with associations and using technology to distribute information.
 - For example, we have learned that the allergen and nutrition labelling information on the Online Labelling Tool are most frequently visited. These could be areas to focus information and efforts to improve awareness, understanding, and compliance.
- Incorporate the proposed new CFIA risk-based inspection model for labelling. The main elements of this model are licensing, preventative control plans, and audit approach.
- Promote an awareness of the existing complaints and enquiries process and build on improved dealer contact information for consumers.

Questions:

1. On a scale of 1-5, (1 being the lowest, 5 being the highest) what is your level of support for proposals for service delivery?

- 1
- 2
- 3
- 4
- 5

2. Where there is a low level of support, what is the concern and how can the approach be improved to address it?

Limit of 250 words.

3. The following are some ideas we heard from stakeholders on additional information on the web that could contribute to better awareness of food labelling for consumers and provide learning opportunities for industry. Please pick the top three that you believe would contribute to improved awareness:

- More stakeholder training on the effective use of the Online Labelling Tool
- Make the OLT more user interactive by allowing the user to input criteria, words or questions to better find information
- Provide access to more frequently asked questions or a decisions databank
- Improve website navigation through use of sequenced or numbered chapters, decision trees, and better navigation keys.
- Better indication of what's new, what's changed, and what is under review or development
- Use technology to make the OLT, policies, and other website information more portable and shareable. This is particularly important if associations are asked to assist or input into either compliance promotion or policy development directions.
- Provide more indication of risk or risk criteria associated with labelling policies and requirements
- Better integrated search capacity for inter and intra government labelling requirements

- Better graphics, mock labels, and examples within the OLT
- Better contact and support through live chat, email, or telephone for regulatory or policy interpretations or clarifications

4. Are there other approaches that should be considered?

Limit of 250 words.

5. The following are some ideas we heard from stakeholders on how we can proactively work together to distribute information, improve awareness, and promote compliance in priority areas. Please indicate if you support these options.

- | Yes | No | |
|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | More active role of industry working groups and associations to share information with members |
| <input type="radio"/> | <input type="radio"/> | Provide associations with summaries of complaints and compliance challenges in an effort to promote compliance and understanding among stakeholders |
| <input type="radio"/> | <input type="radio"/> | Provide more information to industry, such as access to guidance and training |
| <input type="radio"/> | <input type="radio"/> | Co-ordinate with industry to improve messaging in relation to new policies |

6. Are there other approaches to proactively work together to distribute information, improve awareness, and promote compliance you would add?

Limit of 250 words.

C. Policy Development

Currently in Canada, the CFIA and HC lead the development of most food labelling policies to help guide industry and inspectors to consistently interpret regulations and inform the public. Together, all stakeholders rely on clear policies and guidelines to ensure claims are not misleading. Policies are developed for labelling based on a risk continuum that relates to food safety, health, and consumer protection, including social value or consumer values claims.

Some examples of claims related to food safety and health are:

- allergen such as “gluten free”, “peanut free”
- nutrition and diet such as “low-fat”, “no sugar added”
- safe handling and storage instructions such as “ready to eat”, “keep refrigerated”
- composition such as “pesticide free”, “no MSG”, “made with whole wheat”

Other governments are examining its involvement in the development of labelling policies within the risk continuum, and exploring ways to involve consumers and industry on policy development for food labelling claims that relate to consumers’ beliefs and values, often described as “consumer values claims”. These claims have or may have a low or minimal effect on health and safety but can be important to consumers’ purchasing decisions. Some examples of this type of claim include:

- Method of production such as “grain fed” “fair trade”, free range”
- Environmental welfare such as “sustainable”, “organic”
- Endorsements such as “proud sponsor of the Olympics”
- Grade or quality standards such as “grade AA beef”, “vegetarian”
- Origin such as “local”

What we heard:

Industry, consumers and others told us that the current policy development process:

- is not proactive or timely;
- is not sufficiently based on risk;
- does not leverage partnerships and involvement of stakeholders, particularly industry and consumers;
- does not allow for varying government oversight depending on the level of risk; and
- does not always result to policies that provide the guidance and information needed.

Consumers and industry told us they wanted to play a larger role in policy development. Some stakeholders also suggested using certification and recognized third party models for policy development.

Proposals for discussion:

Taking into account stakeholder suggestions of using certification and recognized third party models, we propose to explore with stakeholders, particularly consumers and industry about increasing the roles they could play in the development and maintenance of existing policies, such as local and natural, and new policies.

For example, industry and consumers, including their associations, can have a more active role in the definition, management and resolution of consumer values type of claims, with government oversight only as required, for example in areas of fraud and misrepresentation, or market disruption.

Companies, associations, or third parties could manage the maintenance of the claims and

- be proactive in developing policies on new claims,
- communicate the meaning of the claim to consumers, and
- follow up with respect to consumers and company to company complaints.

The CFIA could enhance the Online Labelling Tool to provide clear criteria for developing truthful and not misleading claims, the process to develop claims (including engagement), and clear definition of “consumer values” claims”. It can assist consumers in understanding their role or the purpose of the consumer values claim and the impact of this claim on them.

Questions:

1. Are you in favour of a model in which industry takes a more active role in the development and maintenance of policies on consumer values claims?

- Yes
- No

2. Why or why not?

Limit of 250 words.

3. How can consumers and industry work better together in the maintenance of existing policies around consumer value claims and in the development of new ones? How can government support this?

Limit of 250 words.

D. Roles and Responsibilities

Consumers, industry and government all have roles and responsibilities in food labelling.

- HC and CFIA share responsibility for federal food regulations and regularly interact with each other and with consumers and industry.
- Industry is responsible for ensuring that the food they sell is compliant with all legislation, and communicating with consumers and government.
- Consumers play an active role in food labelling by seeking out information to help make informed purchasing decisions, reading labels, and identifying issues with labelling.

What we heard: Roles and responsibilities of all stakeholders, including consumers, industry, CFIA and Health Canada, are not clear.

Proposals for discussion:

Taking into account stakeholder's comments, we propose to:

- Seek to understand how we, by working with Health Canada, can better clarify HC and CFIA roles in food labelling by asking you for your ideas;
- Encourage consumers to make appropriate contact with industry on the products they purchase, such as bringing their complaints on consumer value claims and making requests for product information, using the enhanced dealer name and address requirements; and
- Re-enforce the message in the Online Labelling Tool related to consumer awareness about what a specific claim on a food product means, such as natural or free range claims, and help consumers to navigate through the information and to interact with industry on complaints and inquiries.

Questions:

1. From stakeholder feedback we heard ideas on how we can enhance our web site to better inform about the roles and responsibilities particularly for consumer values claims, such as local and natural. Please indicate your support for areas that would increase your level of understanding.

- | Yes | No | |
|-----------------------|-----------------------|---|
| <input type="radio"/> | <input type="radio"/> | Continued integration of HC and CFIA websites to improve stakeholder access to food labelling information. |
| <input type="radio"/> | <input type="radio"/> | Clearer identification of roles and responsibilities between HC and the CFIA, on our respective websites. |
| <input type="radio"/> | <input type="radio"/> | Provide industry and consumers with tools and guidance to support their respective roles in the labelling system. |
| <input type="radio"/> | <input type="radio"/> | Be more clear and transparent on roles and responsibilities for labelling activities between government, industry, and consumers, |

particularly in the area of consumer values claims
2. Are there suggestions not captured above?

Limit of 250 words.

Final Questions:

1. Please provide any additional ideas that you have that will address the key issues and help support development of a more modern and innovative food labelling system.

Limit of 250 words.

2. Please provide any additional comments you may have.

Limit of 250 words.

We thank you for your participation and valuable input into the Food Labelling Modernization engagement on proposals to improve the food labelling system.