



*Long-Term Thinking
for Today's Issues*

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Food Labelling Issues for Canada A CFFO Position Statement

Preamble

The Christian Farmers Federation of Ontario (CFFO) is concerned with the manner in which food products in Canada are labelled. The CFFO believes that regulations that govern labelling in Canada allow misleading marketing practices to occur, as uninformed consumers make purchases based on assumptions regarding the meaning of the label.

Concerns

- 1.) The current requirements of "Product of Canada" labelling are designed in a manner that appears to be misleading from the viewpoint of Canadian farmers. Specifically, the allowance for the label to be used provided 51% of the value-adding takes place in Canada. Our members believe that in order for food to be labelled Canadian the actual food used in the process should originate in Canada.
- 2.) "Canada #1/Grade A" labelling refers to quality, yet the use of the word Canada creates the assumption that the food originated in Canada.
- 3.) The criteria used for terms such as "local" and "natural" enforced by CFIA are extremely restrictive. Farmers should play a more active role in the development of these terms.

Canada's proposed new direction for "Product of Canada" and "Made in Canada" labelling

The Canadian Government has released a discussion document proposing the following changes:

- 1.) "Product of Canada" labelling would change to mean "all or virtually all" of the contents of a food product are Canadian. All significant components, ingredients, processing and labour used would need to be Canadian.
- 2.) The "Made in Canada" label would be used for any food in which its last substantial transformation occurred in Canada, allowing Canadians to support manufacturing in Canada.
- 3.) Other Qualified Claims, such as "roasted in Canada", "distilled in Canada" or "packaged in Canada" would still be allowed, provided they are not false or misleading.

The CFFO's Primary Objective in Labelling Reform

- 1.) The overarching goal of the CFFO recommendations is to produce truth in advertising for Canadian food products. The consumer has the right to know where their food comes from and the right to choose whether to buy that product or not.

Recommendations

- 1.) The CFFO endorses the change to "Product of Canada" labelling. It gives Canadians the opportunity to support the entire value chain and assures them that they get the quality product they expect when they see the "Product of Canada" label.
- 2.) The CFFO believes that the proposed "Made in Canada" label falls short in achieving our primary objective in labelling reform. In order for consumers to make an informed choice, the knowledge surrounding the origin of their food must be available to them on any imported product. However, the CFFO also acknowledges that accurate origin labelling would add costs to processors, which would hurt their competitiveness. The CFFO recommends the following alternative when placing such information on the product is impossible:
 - a. Rather than include the origin of imported products on the label, a reference to a website and phone-number that contains accurate, up-to-date and easily accessible information on product origin be included on the label. This will provide consumers with the information they desire and will be relatively low cost for food processors.
- 3.) The CFFO recommends the voluntary Country of Origin Labelling legislation be enabled by the federal government.
- 4.) The CFFO recommends that water be removed from any measure of Canadian content for any label. We would be very disappointed if the "Product of Canada" label could be used if "all or virtually all" of the product was water, while the perceived primary ingredient was from another country.
- 5.) The CFFO recommends that the use of symbols for qualified claims be closely monitored to ensure that false and/or misleading imagery is not used.
- 6.) The CFFO also recommends that "Canada #1/Grade A" be renamed in such a fashion that the use of the word "Canada" does not mislead consumers.
- 7.) The CFFO recommends that the CFIA hold open consultations on the development of criteria for food labelling adjectives such as "local" and "natural", rather than operating in what seems to be an arbitrary fashion.

Adopted by
CFFO Provincial Council
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