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Sent via email

Ms. Jodi White [jodi.white@inspection.gc.ca](mailto:jodi.white@inspection.gc.ca)  
National Manager, Consumer Protection and Market Fairness Division  
Canadian Food Inspection Agency

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Re: CPEPC/CMC joint comments on label streamlining for meat/poultry in SFCR

Please find attached a tabular list of comments from the voluntary working group. In addition to the specifics for each line item, the working group also wished to provide the following comments:

a) Stakeholders request the coming-into-force timeline of 5 years **after the last labelling change**.

Multiple, sequential label changes, developed and introduced independently by Health Canada and the CFIA, create unnecessary costs and burden on industry. To mitigate costs and administrative burden, many industry stakeholders will wait until all of the regulations and policies are final and technical guidance is made available before initiating label amendments. The 5-year compliance timeline of 2021 introduced with Health Canada's nutrition labelling amendments is eroding as the front-of-package labelling policy and the CFIA's Food Labelling Modernization are still under development. It is consequently recommended that the Government of Canada shift the coming into-force and compliance enforcement to 5 years after the last label change is finalized.

(As taken From: *FOOD PROCESSING INDUSTRY ROUNDTABLE REGULATORY INITIATIVES WORKING GROUP RESPONSE TO LABELLING CHANGES PROPOSED BY HEALTH CANADA AND THE CANADIAN FOOD INSPECTION AGENCY. June 2017*)

b) Industry stakeholders would like to request that all standards be in one location within SFCR for ease of use.

c) Schedule 1 from MIR is the *Standards for Meat Products*.

(<http://laws-lois.justice.gc.ca/eng/regulations/SOR-90-288/page-17.html#h-33>)

Schedule 1 should be transposed, as is, into the Safe Food for Canadians Regs as an IbR document. Prior to doing so, Schedule 1 must be revised as per the following. A revision presents an opportunity that would benefit processors of raw, frozen par-fried poultry products that have found to be the source of recent human illnesses and resulted in recalls. Stakeholders also recommend amending the standard of identity for meat products under Schedule 1 Item 2 of to allow addition of Class II preservatives and vinegar. The other option would be to remove this product category from Schedule I in order to be able adhere to requirements of FDR B14.05 and B22.06 without further restrictions set by MIR Schedule I.

d) Schedule 2 from MIR is the *Permitted Weights for Prepackaged Meat Products*. This should also be transposed as is to the SFCR as part of an IbR document.

e) Industry stakeholders would like to request a list of the IbR (Incorporated by Reference) documents which will be cited within the Safe Food for Canadians Regulations. These should include the Wholesale



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Meat Specification, Poultry Grading Standards, and Revised Schedule 1 at least. The full list should be provided to industry for consultation prior to release.

f) The current MIR does not allow flexibility of labelling for sub-standard product (commonly known as #2 product). To ensure future advances in equipment technology, and flexible options for labelling modernization, this should be considered and included in the SFCR.

g) Stakeholders would like to see the government to set a longer term goal of “consolidating” in one regulation all the standards of identity (compositional standards) and related labeling obligations for meat and poultry products as found in the Food and Drugs Regulations (Divisions 14 and 22) and in the SFCR. We acknowledge this is unlikely to occur with CG2, however it should be the goal, starting with Health Canada also making the FDR standards of identity for meat and poultry products an IbR document simplifying future amendments and consolidation. This request was also included in CMC’s April 21, 2017 submission on CG1.

At a minimum, CFIA should carefully cross reference all wording in the SFCRs (and the IbR schedules) that relate to meat and poultry products to ensure there are no contradictions or inconsistencies with the requirements and definitions of FDR Divisions 14 and 22.

Pending the eventual publication of a single IbR schedule, CFIA should publish a guidance document that gives industry a single, consolidated reference for all the obligations that CFIA inspectors will be enforcing for domestic and imported meat and poultry products.

h) Will there be further consultation on this initiative in advance of CG2? (I.e. will industry learn CFIA’s response to our comments ?)

On behalf of the members of CMC, CPEPC, thank you for the opportunity to provide comments.

Erica Charlton  
Technical Director,  
Canadian Poultry and Egg Processors  
Council

Chris Nash  
Director, Regulatory Affairs,  
Canadian Meat Council

CC: Ms. Ashley Michel, CFIA [Ashley.Michel@inspection.gc.ca](mailto:Ashley.Michel@inspection.gc.ca)  
Ms. Grace Ramos, CFIA [Grace.Ramos@inspection.gc.ca](mailto:Grace.Ramos@inspection.gc.ca)  
“Label streamlining working group” volunteers