



Canadian Spice Association
Association Canadienne des Épices



TECHNICAL & REGULATORY AFFAIRS REPORT

77th Annual CSA Convention

May 11, 2018

Presented by: Anthony Gene

CSA Meeting Agenda



- Food Industry Overview
- CSA Strategic Updates
- Safe Foods For Canadians Regulations (SFCR)
- Safe Imported Foods Initiative (SIFI)
- Healthy Eating Strategy
 - *Front of pack labeling*
- Pesticides and MRL Database
- Allergen Labeling
- Modernizing Spice Standards of Identity
- CFIA Spice Authenticity Survey
- WHMIS 2015

Food Industry Overview – Regulatory Environment

- **Modernization has increased speed and complexity of updates**
 - *Incorporation by Reference*
 - *Need to monitor changes through Canada Gazette process, Government websites and provide comments*
 - *Regulatory changes may happen on date of document publication if incorporated by reference and a transition period may apply*

- **Quantity and scope of regulatory initiatives is large**
 - *SFCA & SFCR*
 - *Labeling modernization*

Food Industry Overview – Regulatory Environment



■ Increased transparency

– *Regulatory Plans list of anticipated regulatory changes and actions*

■ CFIA's Regulatory Plan: 2017-2019 (published 2017-08-14)

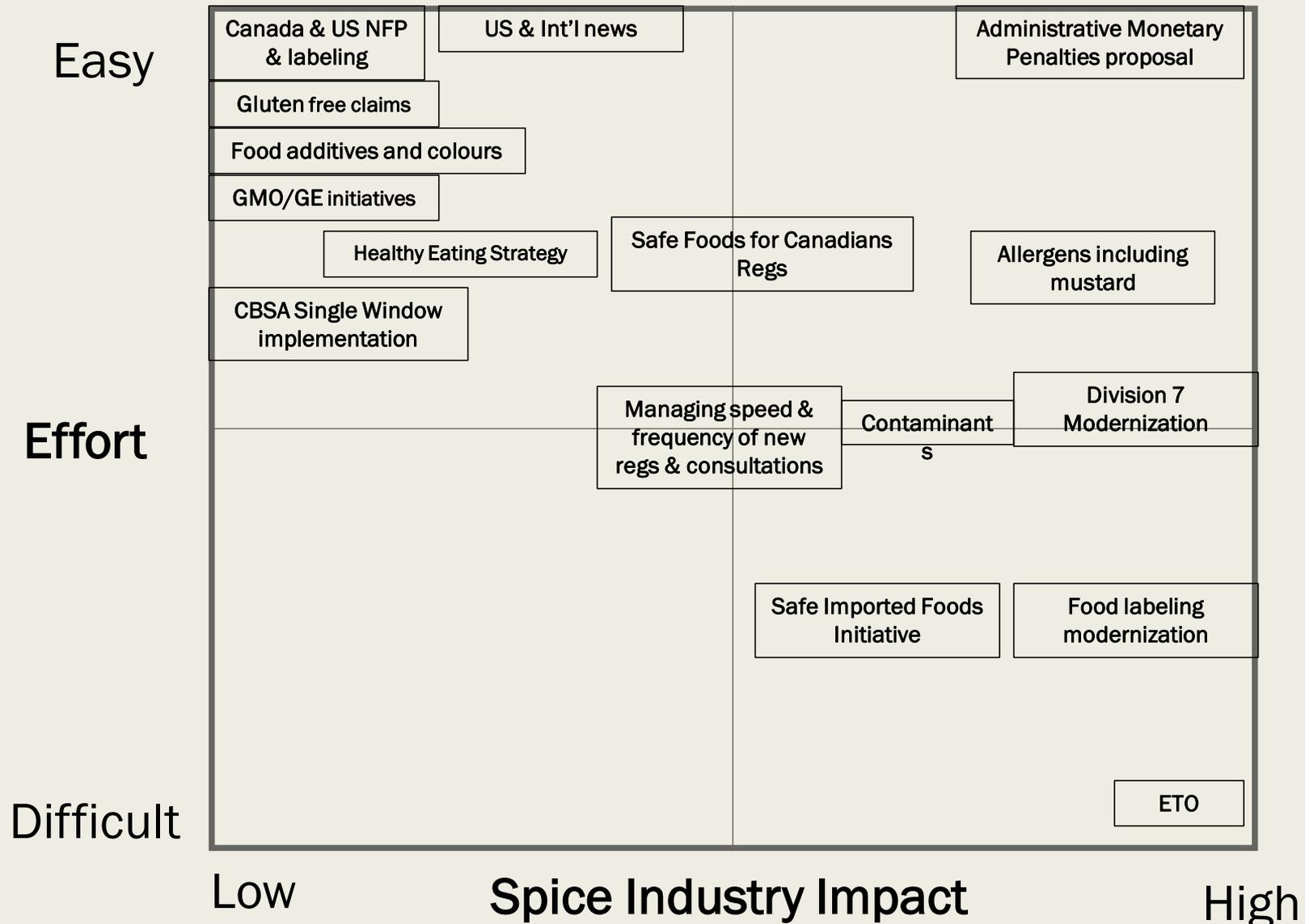
■ Health Canada's Regulatory Plan: 2017-2019 (published 2017-10-06)

– *Every Healthy Eating Strategy consultation is public*

■ Globalization

CSA Strategic Planning Session

Activity/Key Issue Mapping



Changing the Way We Work

■ *What continues*

- *Member engagement*
- *Reliance on member knowledge and expertise*
- *Utilizing our networks for information and influence*

■ *What starts*

- Increased focus on strategic priorities
- Updates via a Newsletter
- Increasing engagement by more members
- More regular outreach and engagement with regulators and other stakeholders

Safe Food for Canadians Act and Regulations

LICENSING

Clear mechanisms for identification and oversight of regulated parties

PREVENTIVE CONTROLS

Industry documentation of hazards, and measures to address them in preventive control plans (PCPs)

TRACEABILITY

Facilitating effective response in case of non-compliance

Reflects consistent, internationally recognized requirements for all food **imported, exported, or traded inter-provincially**

Expected to be published in Canada Gazette II in Q2
2018

What businesses Can do Now



- Get to know and understand the proposed SFCR
- Plan ahead and start practicing some commonly known food safety controls
- Preventative Control Plans
 - *Draft guide for preparing a PCP for importers*
 - *Draft PCP templates for domestic food business and exporters*
- Ask questions and stay connected (AskCFIA email)
- Sign up for a secure My CFIA account today and apply for a license

- Draft Regulations: www.gazette.gc.ca
- Tools & Guidance Materials: www.inspection.gc.ca/safefood
- Email Questions: www.inspection.gc.ca/AskCFIA
- My CFIA Account: www.inspection.gc.ca/MyCFIA

Safe Imported Foods Initiative

- IE Canada project, funded by Agriculture and Agrifood Canada (AAFC), to develop an imported food safety program:
 - System based on new regulations
 - Utilize and build HACCP models
 - Develop guidance documents
 - Establish an audit verification system
 - Certification recognized by CFIA
- End product is a **standardized, repeatable and auditable** process to prove imported food meets Canadian food safety standards



From Importers Exporters Association of Canada Oct 5 & 6
Working Group Kick Off Meeting

Development of IE Canada's Canadian Imported Food Safety Assurance Model

- **Phase 1 (completed in March 2018):** Determine which food commodities to cover
 - *CSA participated on the working group*
 - *Spices, herbs and seasonings were selected, and 3 supply chains mapped as examples*
- **Phase 2 (not started):** Build Food Safety HACCP Models & Create Guidance Documents
- **Phase 3:** Develop an audit verification system
- **Phase 4:** Release models and guidance documents & launch certification



From Importers Exporters Association of Canada Oct 5 & 6
Working Group Kick Off Meeting

Highlights of IE Canada's Report to AAFC at end of March 2018

Conclusions from phase 1:

- Supply chains are unique and complex
- Ownership of product varies throughout the supply chain
 - *Physical possession and legal ownership vary*
 - *Numerous responsible parties with inconsistent roles*
- Developing standards for every single food category is not feasible
- HACCP models can be based on three basic categories: Ambient, Refrigerated and Frozen

Next Steps:

- Proposal submitted to AAFC to develop Food Safety Standard, HACCP models and supporting guidance documents for:
 - *food that is transported and stored at ambient temperature;*
 - *food that is transported and stored refrigerated; and*
 - *food that is transported and stored frozen*

HEALTHY *eating* Strategy

VISION: Make the healthy choice the easy choice for all Canadians



Healthy Eating Strategy Highlights

- Trans fat
 - *Regulations changed to prohibit the use of PHOs in foods by adding to the list of Contaminants and Other Adulterating Substances in Foods*
 - *Transition period of one year*
- Sodium Reduction
 - *Health Canada concluded in a recent progress review not enough has been done to reduce sodium*
- Canada`s Food Guide





Nutrition Labeling Modernization

Proposed extension of nutrition labeling regulation transition period to Dec 14, 2022 will align with FOP implementation deadline

New Requirements:

- Consistent serving sizes
- % Daily Value (DV) for total sugars
- DV footnote to explain concept

Nutrition Facts Valeur nutritive

Per 1/2 cup (125 mL)
pour 1/2 tasse (125 mL)

Calories 80	% Daily Value*
	% valeur quotidienne
Fat / Lipides 0.5 g	1 %
Saturated / saturés 0 g	
+ Trans / trans 0 g	0 %
Carbohydrate / Glucides 18 g	
Fibre / Fibres 2 g	
Sugars / Sucres 15 g	15 %
Protein / Protéines 3 g	
Cholesterol / Cholestérol 0 mg	
Sodium 0 mg	0 %
Potassium 200 mg	4 %
Calcium 0 mg	0 %
Iron / Fer 0.3 mg	2 %

*5% or less is a little / 5% ou moins c'est peu
15% or more is a lot / 15% ou plus c'est beaucoup

- Added sugars grouped in ingredients list
- Declare food colours by common name

Ingredients: Sugars (fancy molasses, brown sugar, sugar) • Wheat flour • Vegetable oil shortening (soybean and/or canola oil and modified palm oil) • Liquid whole egg • Salt • Sodium bicarbonate • Spices • Allura Red
Contains: Wheat • Egg • Soy
Ingédients: Sucres (mélasse qualité fantaisie, cassonade, sucre) • Farine de blé • Shortening d'huile végétale (huile de soja et/ou huile de canola et huile de palme modifiée) • Oeufs entiers liquides • Sel • Bicarbonate de sodium • Épices • Rouge allura
Contient: Blé • Oeufs • Soya

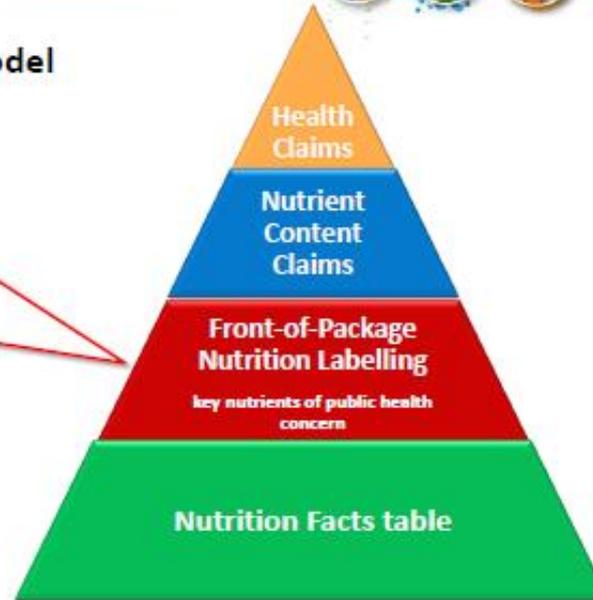
Front of Pack Labelling

FOP Proposal

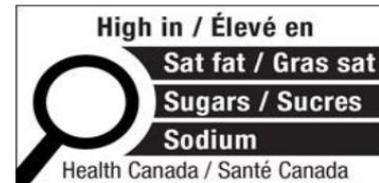
Nutrient-specific 'HIGH IN' Model

Would Be:

- Mandatory
- Symbol-based
- Visible when a food is "high in" sugar, sat. fat and sodium
- Built on existing nutrition labelling



Proposed symbols



FOP's Objective is to Enable Consumers to Make Better Informed Food Choices

FOP Proposal Concerns

- All Industrial and food service product labels will require FOP labeling
- FOP calculation proposal will require FOP labeling of seasonings as serving size rounded up to 50 g, when the reference amount is only 1 g
 - *Creates inconsistency between FOP label warning and NFT information*

CSA's Comments

- Exempt industrial and food service labels when NFT is not present
- Proposed new criteria for calculation
 - *Eliminate the 50 g criteria supported by consumer consumption data*
 - *Increase the DV to 15% from 5%*

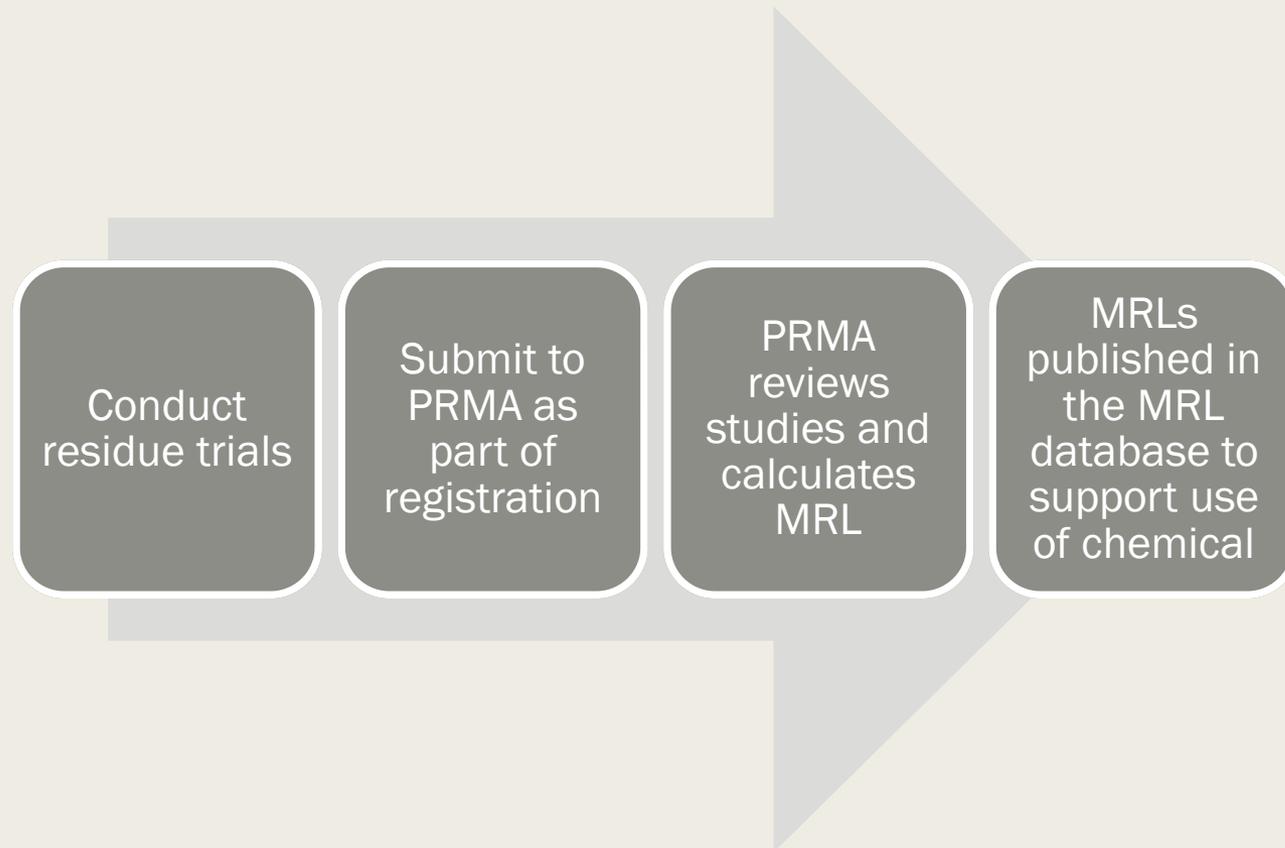
Changes to the Regulation of Ethylene Oxide



- Maximum Residue Levels (MRLs) are the highest residues legally allowed to be in/on food items after use of pesticides according to label directions
- In 2017 responsibility shifted to Health Canada's Pest Management Regulatory Agency (PMRA) for setting pesticide MRLs on all foods, as well as registration and regulation of pesticides in Canada
- In Oct 2017, PMRA's MRL database updated with new MRLs for Ethylene Oxide and Ethylene Chorohydrin, set at 7 ppm and 940 ppm respectively, for specific herbs and spices
 - *Consistent with the US tolerances for these commodities including Basil prohibition*
 - *Commodity gaps identified*

How do we get new MRL`s

MRLs (based on Canadian data) = Import Tolerances (based on foreign data)



Status of new MRL`s for missing spice commodities



- CFIA and Health Canada agree that treating the missing commodities with ETO can continue as no health or safety concerns
 - *ETO residue level is 7 ppm max and ECH is 940 ppm max*
- ETO registrant has submitted an application for the missing import tolerances, and the data is under review by PRMA
 - *ASTA generously provided residue data from a very large US study*
 - *PRMA cannot provide an estimate when their review will be complete or the MRL database will be updated*
 - *An update will be provided by PMRA at the end of the summer*

Allergen labelling

- In April 2018, CSA responded to HC proposal supporting the regulatory update proposal which will allow the “may contain... (name the allergen)) statements that are currently used to remain

Mustard Precautionary Labeling

- Initial HC results of flour analyses using ELISA methods appeared to show low levels of mustard in a significant number of samples
 - *This was partly responsible for HC's Feb 2016 posting, Information for Canadians with Mustard Allergy*
- Standard ELISA method used to detect mustard will also respond to canola
 - *Positive result with ELISA indicates the presence of either mustard or canola*
- HC's additional confirmatory testing in late 2017 using a different technique (LC/MS/MS), along with information from visual inspections indicate the ELISA results are likely due to the adventitious presence of canola seed, not mustard seed, in the flours and finished foods

Mustard Precautionary Labeling

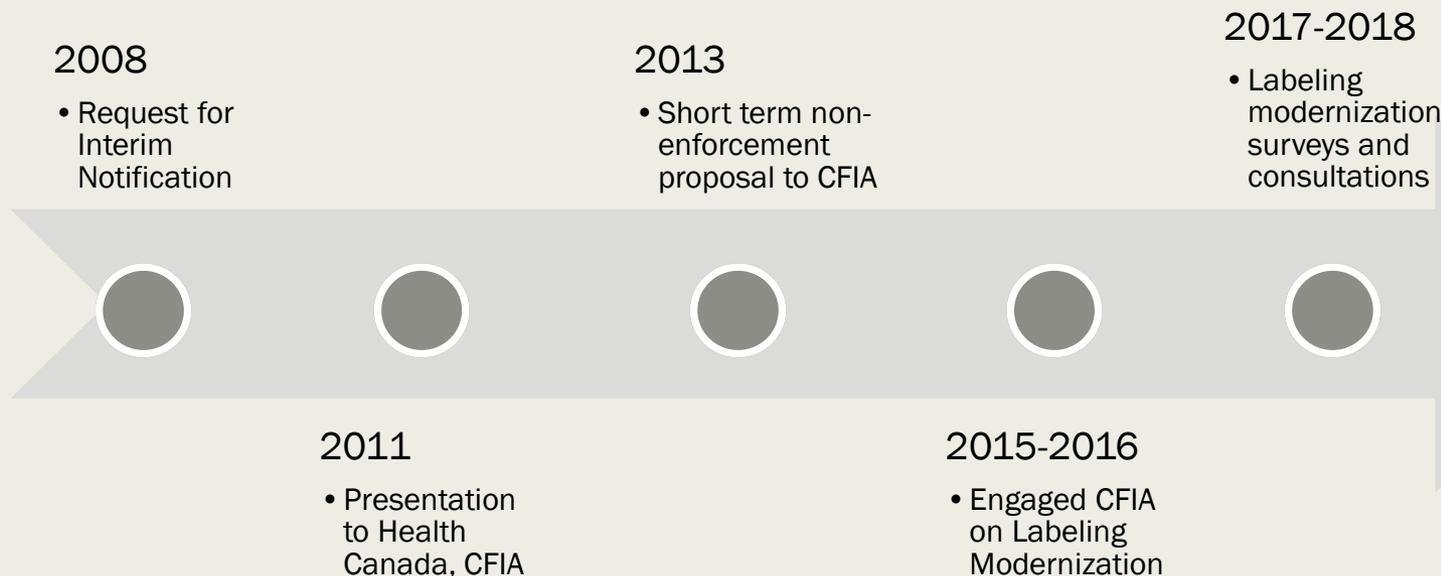
- Canola seed is grown in large quantities in Canada
 - *Not a priority food allergen in Canada*
 - *Canola oil is usually highly refined to remove residual protein and not considered to pose a risk to mustard allergic individuals*
- Canola and mustard seeds are very closely related
 - *The cross reactivity of mustard allergenic individuals to canola has not been characterized*
 - *No adverse reactions reported or recalls resulted from the adventitious presence of mustard in grains/or flours*
- Currently HC is not recommending the precautionary labeling of mustard in foods containing cereal grains and/or flours
 - *An update will be provided on HC's website when completed*

Division 7 Progress (04/18)

– NO CHANGES

Objective for Regulatory Modernization:

1. Maintain/add botanical source in regulation (IbR)
2. Provide a definition for spices and herbs and,
3. Repeal quality related compositional requirements



- CFIA recognizes the need to modernize D7, but their priority is labeling modernization
- CSA can work to align stakeholders to new standards before the formal consultation process begins in 2019 or 2020

CFIA Spice Authenticity Testing



- CFIA and CSA Meeting to Discuss 2016-17 Spice Survey
- Access to survey results before publication is possible
- Analyzing for known and emerging hazards - Gluten, allergens and colours

Results:

- 7 samples adulterated with food dyes
- 43 unsatisfactory results for gluten (>20 ppm)

CFIA Spice Authenticity Testing

CFIA's Sampling Year	Number of Spice		Spice Sample Compliance
	Samples	Tests	
2012-13	15	37	100%
2013-14	4	16	75%
2014-15	13	29	85%
2015-16	301	922	65%
2016-17	304	925	69%
2017-18 (directed sampling)	0	0	N/A

Next Steps:

- Increased Awareness of the findings and ongoing monitoring program
- Enhancement to industry monitoring and preventative programs

Thank You Technical Committee

