



December 1, 2020

Sent by email: cfia.labellingconsultation-etiquetage.acia@canada.ca

Dear Sir or Madam,

RE: CFIA consultation on simulated meat and simulated poultry products

Ontario Pork appreciates the opportunity to provide input on this important consultation regarding proposed changes to guidelines for simulated meat and simulated poultry products.

Ontario Pork represents the 1,180 farmers who market 5.5 million hogs in the province. The organization is engaged in many areas, including research, government representation, environmental issues, consumer education and food quality assurance. Ontario Pork is the first livestock commodity group in the province to set social responsibility benchmarks, demonstrating pork producers' commitment to sustainable farming. Ontario's pork industry "farm to fork" generates \$2.6 billion in economic output and 13,186 in full-time equivalent jobs.

Ontario Pork encourages consumer choice and welcomes competitive markets as well as consumers being free to make their own food choices. However, we also firmly believe that accurate and truthful labelling and marketing of alternative protein products must occur, so that clear choices can be made. The labelling and marketing of alternative protein products should not mislead or confuse consumers.

Our specific comments and questions regarding the proposed guideline changes are as follows:

Guidance document title

- We recommend changing the guidance document title from "simulated meat and simulated poultry" to "alternative proteins and plant-based protein" to reflect wording used by Health Canada and in the United States.

Legal definition of pork and meat

- We support the legal definition of pork and meat as it is written in the Food and Drug Regulation.

Category 1, 2, and 3

- Since Category 2 plant-based products are designed to mimic real meat, we believe that they must face the same stringent regulatory requirements as livestock agriculture, including truthful labelling standards.

- Unsubstantiated nutrition and environmental superiority claims of Category 2 and 3 products relative to Category 1 foods cannot be allowed.
- Products designed and marketed to mimic ground meat should require labelling according to the fat content, for example, “extra-lean” or “lean”.
- We are concerned with meat nomenclature being used for non-meat products. “Meat” has a specific definition in the Food and Drugs Regulations (the FDR), to use it in the proposed guidance would be in contravention of the FDR. Meat and meat related words should only be allocated to animal protein products.
- We recommend that the terminology be clarified and changed. For example, the term “patty” is currently defined as 100% meat, so “soy patty” does not meet the current regulatory requirement.
- To reduce potential confusion, we recommend combining Category 2 and Category 3. Products would either be meat (Category 1) or non-meat/simulated/plant-based (called Category 2 or Other).
- Overall, it is critical to align Canada’s and the United States’ regulatory requirements (e.g., terminology, product definitions, labelling requirements) to be consistent so that consumers are not confused, and trade is not disrupted when products are exported between countries.

Complaints based approach and enforcement

- We are concerned with the complaints-based approach and enforcement; more resources need to be allocated to enforcement of fraudulent and misleading labelling claims.

Advertising of products

- We recommend that the advertising section within the table be strengthened as this is where much of the confusion lies. What are these products:
 - Clean meat – did they go above and beyond on food safety?
 - Beyond meat/burger – are these just really good burgers?
 - Plant based – is it mostly plant but a bit of meat mixed in?
 - Vegetarian meat – was the animal fed a vegetarian diet?
 - Smart Bacon – does the bacon make me smart?

We once again thank you for the opportunity to provide input and welcome an opportunity to provide further input, as required.

Sincerely,



Eric Schwindt
Board Chair