



*the alliance for healthy food & farming*

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To Whom It May Concern,

On behalf of Sustain Ontario, the alliance for healthy food and farming, we applaud the Canadian Food Inspection Agency's efforts to consult with the public and key stakeholders on the modernization of food labeling in Canada.

Sustain Ontario is a province-wide, cross-sectoral alliance that promotes healthy food and farming. Sustain Ontario works collaboratively to connect members, showcase food system innovations and champions, explore and research pressing issues in the food system, and advocate for a healthy and sustainable food system. With over 400 organizational members in the Ontario food and farming sector, Sustain Ontario is working toward a food system that is healthy, ecological, equitable and financially viable with the voice of a powerful and diverse constituency.

As such, the CFIA's modernization process concerns our members in several ways.

***A food system that is healthy:*** Needless to say, a food system that promotes food safety and traceability is paramount. However, a healthy food system also encompasses consumer values such as production and processing practices that maximize freshness and quality while minimizing ingredients and inputs that may have harmful effects on the health of consumers, producers and/or the environment.

- Labeling strategies that allow all actors to make healthy choices are critical.

***A food system that is ecological:*** As an alliance, we know that **all** farmers are environmental stewards. However, we also believe in the importance of recognizing and rewarding producers who make special efforts to increase the ecological sustainability of their land and production practices.

- Food labeling that allows value chain actors to support ecological practices is key.

***A food system that is equitable:*** An equitable food system is one that provides equal access to fresh, healthy, and culturally appropriate foods for all Ontarians while ensuring that all value chain actors are able to maintain a sustainable livelihood, including farm workers.

- It is important that while traceability and labeling efforts are modernized, premium prices and traceability costs are kept at a minimum to ensure small and medium scale

enterprises remain viable and that all Ontarians have access to healthy, safe and appropriate foods.

***A food system that is financially viable:*** While health, ecology and equity are critical components to the food system that we envision, Sustain Ontario acknowledges that these values must be predicated on a system that is economically sustainable. We are particularly concerned with maintaining financial viability for diverse scales of food and farm enterprises that allow for regional economic development throughout our province. To this end, it is important that food safety and traceability efforts:

- Recognize the diversity of scales and practices and consider scale-appropriate measures
- Understand the particular needs of on-farm value-added enterprises and direct markets
- Work with the provinces to create a definition of “local” that enhances but does not impede efforts to encourage regional economic development within Canada.

Claims and labels that concern our membership include: *Cage free, Free range, Free Roaming, Foodland Ontario, Grass fed, Grain fed, GMO (or non-GMO), Halal, Kosher, Local, Made In Canada, Natural, Organic, and Sustainable* among others. However, given the recent announcement of the *Local Food Act* in Ontario and the CFIA’s recent creation of an “interim definition” of local, we conducted a survey to determine what a definition of “local” should be and how it might be enforced.

#### **Survey on the Definition of “Local”**

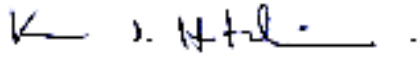
Of the 281 Ontarians who responded to our survey over the months of August and September 2013, over 60% responded that there should be a consistent approach to defining “local” in Ontario. When asked how local should be defined, over 30% chose a tiered definition that prioritizes regional farmers and processors but extends to include the province and neighbouring jurisdictions. When given a choice of how we define 'local' only 17% chose the CFIA’s original definition of within 50km of point of purchase.

Given that both the provincial government and the CFIA have some jurisdiction in the promotion and/or labeling of “local,” we asked respondents to consider who they felt best equipped to define and monitor the word “local.” When asked who should be responsible for defining “local” respondents were able to choose multiple options and over half of the respondents felt the provincial government should be responsible, over 40% felt that municipal and regional ‘buy local’ initiatives were preferred, while only 20% of respondents saw the CFIA has playing a key role. It is clear from these responses that our membership believes a national label for “local” must also take into consideration approaches being promoted at the provincial, regional and municipal levels. Many of the comments reflect the fact that consumers want a more integrated approach to tracking and labeling of provenance of products so that they can make an informed choice while allowing for flexibility.

We strongly encourage you to take a more detailed look at the [survey results on our website](#).

Many of the results of our survey echo ideas put forward by the Eastern Ontario Local Food and Farming Collaborative's document to the Eastern Ontario Wardens (please see attached). While Ontario specific, the same principles are ones that Sustain Ontario would like to see incorporated as a basis for CFIA's new labeling policy at the national level. Recognizing the importance of regionalism and terroir as the basis of local, and importantly, consumers' understanding of local, is key to successful labeling. Ensuring that labels citing “local” also cite where food is actually produced is key to ensuring a transparent labeling system that allows Canadians to make informed choices with their food dollars.

We thank you for considering our submission and look forward to working with you further throughout the modernization process.



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