



February 27, 2018

## **Special Bulletin: CFIA moves to align with ANAC positions on labelling and exports in new regulations**

The modernization of the *Feeds Regulations* has been ongoing since November 2011 and is expected to be complete in 2019. Although much positive progress has been made on this file, ANAC continues to engage with CFIA on outstanding issues. ANAC is pleased to announce that after considerable discussion with CFIA, a satisfactory resolution has been achieved for our concerns related to the list of ingredients on feed labels, bilingual labels, and feed exports.

### Labelling – List of ingredients

In CFIA's 2013 Feed Labelling Regulatory Framework Proposal, it was proposed that "all feeds require the complete list of ingredients for that feed on the label". Industry strongly opposed this suggested requirement as the cost and resources necessary to comply would have created a significant regulatory burden with little benefit to feed customers. As well, there would be an additional challenge for bagged feed with pre-printed labels due to the industry's use of least cost formulation. As a result of many bilateral meetings and the industry's submissions for the cost-benefit analysis, CFIA has modified the proposed requirement. Industry will be able to provide a statement on the label, as is done today, indicating that a list of ingredients is available upon request. This list will need to be provided within three business days to any producer who requests it in writing.

### Bilingual labels

CFIA originally proposed that all labels would need to be in both French and English as per the requirements outlined in *The Official Languages Act*. After discussions with their legal counsel regarding balancing the requirements of the Act with keeping regulatory burden to a minimum, it was determined that only safety information will need to be in both languages on labels. This includes warnings and statements as they appear in the Compendium of Medicating Ingredient Brochures (CMIB) for the on-label use of over-the-counter drugs. Medicated feed labels made pursuant to a veterinary prescription will not need to be bilingual as it will be the veterinarian's responsibility to ensure the producer has the necessary information to safely use the medicated feed which they have prescribed. Cautions and warnings will still need to appear on veterinary prescription feed labels but only in one official language.

### Exports

CFIA's position on exports of feed and feed ingredients, as outlined in their 2015 Feed Regulatory Renewal Consolidated Modernized Framework Proposal, was that any product exported from Canada would need to meet domestic requirements including nutrient and contaminant maximums. ANAC's response to this proposal has always been that products manufactured for export should be required



only to meet Canadian manufacturing safety requirements. As long as facilities have performed a hazard analysis and implemented a preventive control plan (PCP), manufacturers should have the flexibility to comply with the product safety requirements of the importing country, even if they are not identical to Canadian regulations.

After reviewing feed industry concerns and what was being considered for food exports through the *Safe Food for Canadians Regulations*, CFIA's new proposed requirements for operators who export feeds will be the following:

- a) have a licence from CFIA;
- b) manufacture feeds in accordance with a PCP;
- c) have documentation demonstrating that the importing country's requirements are being met. (If the importing country has no requirements, then Canadian safety standards would apply.)

CFIA will be preparing and posting on their website a supplementary response to the consolidated proposal consultation summary report outlining the changes to policy positions as described in this special bulletin. These supplementary responses will be made public on CFIA's website in the coming months.

ANAC is very pleased with the developments on this file and would like to thank its members for the input and feedback received so that we could ensure the new regulations are a positive development for the industry.