



CANADIAN HEALTH FOOD ASSOCIATION

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October 28, 2024

Canadian Food Inspection Agency

Submitted via email: cfia.labellingconsultation-etiquetage.acia@inspection.gc.ca

Re: Feedback on Labelling Plant-based Alternatives to egg products

On behalf of the Canadian Health Food Association (“CHFA”), we are writing to provide comments on the consultation for plant-based alternatives to egg products. CHFA appreciates the opportunity to provide feedback. As Canada’s largest trade association dedicated to natural health, organic and wellness products, CHFA is committed to representing our members and the industry on proposed regulatory changes that will directly influence their business operations. Our membership base consists of hundreds of businesses across Canada, including manufacturers, retailers, wholesalers, distributors and importers of natural health products and food products. These businesses produce a variety of plant-based foods and could be impacted by labelling and representation of plant-based alternatives products.

General

As an industry stakeholder, CHFA recognizes that growing consumer interests in including more plant-based options in their diets. In alignment with Health Canada’s Healthy Eating Strategy, which promotes increased intake of plant-based foods, we support a regulatory framework that fosters innovation and growth within the sector. CHFA fully supports the CFIA’s proposed guidance to provide clarity on the *Food and Drug Regulations* as they apply plant-based food, including emerging categories like plant-based egg products.

The proposed updates reflect both current market dynamics and evolving consumer demand, while encouraging innovation among Canadian businesses and enhancing opportunities for international trade. By aligning regulatory guidance with consumer preferences and enabling clear, transparent food labelling, we are working together to empower consumers to make informed choices that reflect their dietary needs and values.

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Differentiation Between Egg Products and Plant-based Alternatives

To ensure transparency and clarity within the guidelines, CHFA recommends that another example is added within the common names to include the term “egg substitute” and “egg-like” as a non-misleading example of a plant-based alternative under ‘Components to determine the overall impression.’ As many small and medium-sized businesses are trying to navigate the complex regulations this would provide further clarification on what language can be displayed to describe their product. Additionally, these terms can be valuable to a consumer when they are trying to understand the functionality of a product. In terms of the overall impression of the food, we suggest establishing a definition of what is plant-based as it would improve consumer understanding of the composition of these foods.

Beyond the proposed guidelines, there is a clear need for regulatory modernization for regulations that reflect today’s evolving food market, particularly the rise of plant-based products. CHFA strongly encourages CFIA to continue to communicate to Health Canada the need to modernize the food regulations to align with the proposed CFIA guidance. We also recommend collaboration with Statistics Canada to conduct a Canadian Community Health Survey (CCHS) that captures Canadian consumption patterns of plant-based alternatives in today’s market. By gathering this data, the government will gain valuable insights into how Canadians are integrating these products into their diets, enabling a data-driven approach to regulatory modernization that supports consumer demands and nutritional needs.

With updates in guidance, it will be crucial to provide adequate education to CFIA inspectors on these emerging categories. Once the new guidance is published, inspectors must be well-informed on how to accurately assess plant-based egg products for compliance. It is essential that CFIA offers comprehensive training to ensure a consistent and unified understanding of the new regulations. This will not only ensure the quality and uniformity of inspections but also create a level playing field for the industry, offering greater clarity to food manufacturers navigating these guidelines.

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Suggestions for Regulatory Amendments in the Plant-based Space

CHFA believes it is essential to amend regulations to align with Canadian consumers' evolving understanding of plant-based food products. We support similar revisions to key sections of the Food and Drug Regulations, including Division 8 on Dairy Products, Division 14 on Meat Products, and Division 22 on Poultry and Poultry Meat Preparations. Currently, the use of common names like 'milk,' 'cheese,' 'butter,' or 'meat' for plant-based foods is prohibited in Canada. As the proposed guidance for plant-based egg alternatives promotes innovation, we believe these changes should extend to other plant-based categories. Additionally, clarity is needed on whether fortified and non-fortified products (such as simulated meat and poultry) will be assessed differently.

CHFA also stresses the importance of developing clear guidance for plant-based dairy products. We advocate for regulatory amendments that provide greater clarity and flexibility, helping businesses navigate the complexities of the Food and Drug Regulations. Clear and modernized regulations will support innovation, allow industry to better position plant-based foods, and meet today's consumer demands. While we support the development of guidelines for plant-based egg alternatives, we also recommend prioritizing other categories, like dairy alternatives, to further strengthen the Canadian plant-based food sector.

Conclusion

CHFA fully supports the introduction of this new guidance, as it will provide much-needed clarity for both the industry and consumers regarding plant-based alternatives to egg products. We believe this guidance will promote innovation, align with consumer preferences, and foster growth in the Canadian food and beverage industry.

We appreciate the opportunity to contribute to this consultation and hope to see more guidance that reflects the evolving plant-based food market. In addition to guidance updates, we emphasize the importance of communicating the need for regulatory modernization to Health Canada, and collaboration with Statistics Canada to gather data on plant-based consumption patterns. This data will provide a solid foundation for future

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regulatory adjustments and better address consumer needs.

As a committed stakeholder, CHFA stands ready to offer our expertise and support in these efforts, and we hope our feedback is given due consideration. We look forward to ongoing collaboration to ensure that Canada's regulatory framework supports innovation, transparency, and consumer choice in this growing sector.

Sincerely,

Kassandra Wagner
Regulatory Affairs and Policy Manager
Canadian Health Food Association

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