



SAFE

Arab Food Safety Initiative for Trade Facilitation

المبادرة العربية لسلامة الأغذية وتسهيل التجارة

Overview of the Canadian Food Standard Setting System

Workshop on Food Standards Setting in the Arab Region

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Food Standard Setting System Responsibilities

Ensuring the Safety, Quality and Authenticity of Food is a Shared Responsibility:

☐ Industry – Primary Responsibility:

- Sourcing ingredients
- Safe & sanitary conditions of production & sale
- Honest representation to consumers

☐ Consumers

- Choice of food and consumption as per direction
- Food handling and conservation as per recommendation to avoid spoilage and contamination (including cross-contamination)

☐ Regulators

- Delegated authority from consumers to oversee “food” on their behalf



Objective of Canada's Food Standard Setting System

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Primary Objective

Protect consumers

- Health (Safety)
- Deception (Quality)

Accompanying Objective

Ensure fair practices in the food trade

- Predictability
- Equality of treatment
- Transparency

Alignment with CAC/GL 82-2013 (Section 2)



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Canadian Food Safety: Key Federal Organizations



Food Safety and Nutrition Roles



Canadian Food Safety: Key Federal Accountabilities

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On-farm Food Safety

Policy &
Standards

Surveillance &
Early Warning

Education &
Outreach

Inspection &
Enforcement

Public Health Surveillance

Health Canada
www.hc-sc.gc.ca

Agriculture and Agri-Food Canada
www.agr.gc.ca

Canadian Food Inspection Agency
www.inspection.gc.ca

PUBLIC HEALTH AGENCY of CANADA
www.publichealth.gc.ca

AAFC

HC

CFIA

PHAC

- Contributes to research and development of on farm food safety programs

- Establishes food safety policy and standards
- Assesses the effectiveness of CFIA's food safety activities
- Conducts health risk assessments in support of food safety investigations
- Informs Canadians about potential risks to their Health

- Designs and delivers federal food inspection programs
- Monitors industry's compliance with the Acts and Regulations
- Undertakes enforcement action as necessary
- Conducts food safety investigations & food recalls

- Public health surveillance
- Leads foodborne illness outbreak investigations with P/T public health officials



Recap: Major Actors



Health and Safety Standards



- ☐ Food Production Standards (“How To?”) including Food Safety Considerations
- ☐ Food Quality Standards / Requirements
 - E.g. Standard for organic foods (in the form of Regulations)

Structure of the Standard Setting System

LAWS

Set the general requirements of food safety, quality and consumer protection

- ☐ Food and Drugs Act (1953) amended/updated in 2012
- ☐ Canadian Food Inspection Agency Act (1997)
- ☐ Safe Food for Canadians Act (2012)

REGULATIONS

Authorities to Develop Regulations, Standards and Guidelines

- ☐ Food & Drug Regulations
- ☐ Safe Food for Canadians Regulations

Content of the Food and Drugs Act

Key Elements

- ❑ Definition of Food
- ❑ Food (Sections 4 to 7)
 - These sections outline prohibitions on the sale of food that would be considered “unsafe”, non compliant, or manufactured under unsanitary conditions
 - Also prohibits deceptive activities
- ❑ Inspector Powers (Sections 22 to 27)
 - These sections outlines authorities that can be exercised by inspectors
- ❑ Regulation Making Authorities (Sub section 30(1))
 - This section enables key regulatory authorities that enable the *Food and Drugs Regulations*

Food and Drugs Act

F-27

An Act respecting food, drugs, cosmetics and therapeutic devices

SHORT TITLE

Short title

1. This Act may be cited as the *Food and Drugs Act*.
R.S., c. F-27, s. 1.



Content of the Food and Drugs Regulations

Regulations can be:

❑ ENABLING

- Food Additives
- Novel Foods
- Infant Formula

❑ PRESCRIPTIVE

- Compositional standards
- Requirements for nutritional quality of foods,
 - Mandatory Fortification
- Mandatory Nutrition Facts Labeling

❑ PROHIBITIVE

- Limit levels of additions of vitamins and minerals
- Limit levels of contaminants and certain naturally occurring substances in foods
 - e.g. limit on aflatoxins in nuts and related products, substances not permitted as food

Nutrition Facts	
Per 125 mL (87 g)*	
Amount	% Daily Value**
Calories 80	
Fat 0.5 g	1 %
Saturated 0 g	
+ Trans 0 g	0 %
Cholesterol 0 mg	
Sodium 0 mg	0 %
Carbohydrate 18 g	6 %
Fibre 2 g	8 %
Sugars 2 g	
Protein 3 g	
Vitamin A 2 %	Vitamin C 10 %
Calcium 0 %	Iron 2 %



Canadian Food Requirements Matrix

Canadian food requirements tend to be presented in the form of a matrix:

Horizontal Standards	Requirements
Food Additives	Div 16: Food and Drug Regulations (FDR) + Marketing Authorizations (MAs)
Contaminants	Div 15: FDR + MAs and Lists
Pesticides	Div 15: FDR + Lists of Approved Pesticides
Veterinary Drugs	Div 15: FDR + List of Approved Veterinary Drugs used in Conjunction with Food Production
Laboratory Methods	Spread throughout Regulations and mostly Outlined in Guidelines
Nutrition / Allergen Labelling	Div 1: FDR + Specific Provisions

Vertical Standards

- ❑ Tend to be standards of identity for food commodities
- ❑ Housed in the Food & Drug Regulations from Divisions 2-14, 17-25, 27 and 28
- ❑ Tend to be mostly standards of quality:
 - Composition and condition of production
 - But may also encompass safety considerations



Honey

Div 18



Tea

Div 20



Wine

Div 2



Milk

Div 8



Coffee

Div 5

Composition and Safety Requirements

An Example of a Standard displaying both Compositional and Safety Requirements:

DIVISION 4

Cocoa and Chocolate Products

B.04.001 The definitions in this section apply in this Division.

chocolate product means a product derived from one or more cocoa products and includes chocolate, bittersweet chocolate, semi-sweet chocolate, dark chocolate, sweet chocolate, milk chocolate and white chocolate. (*produit de chocolat*)

cocoa product means a product derived from cocoa beans and includes cocoa nibs, cocoa liquor, cocoa mass, unsweetened chocolate, bitter chocolate, chocolate liquor, cocoa, low fat cocoa, cocoa powder and low fat cocoa powder. (*produit du cacao*)

milk ingredient means one or any combination of

(a) the following products for which a standard is prescribed in this Part, namely,

- (i) milk or whole milk,
- (ii) skim milk,
- (iii) partly skimmed milk or partially skimmed milk,
- (iv) sterilized milk,
- (v) condensed milk or sweetened condensed milk,
- (vi) evaporated milk,
- (vii) evaporated skim milk or concentrated skim milk,
- (viii) evaporated partly skimmed milk or concentrated partly skimmed milk,
- (ix) milk powder or whole milk powder or dry whole milk or powdered whole milk,

Composition and Safety Requirements (2)

An Example of a Standard displaying both Compositional and Safety Requirements:

Permitted Additives

B.04.005 (1) Cocoa products may be processed with one or more of the following pH-adjusting or alkalizing agents:

(a) hydroxides of ammonia, carbonates of ammonia, bicarbonates of ammonia, hydroxides of sodium, carbonates of sodium, bicarbonates of sodium, hydroxides of potassium, carbonates of potassium or bicarbonates of potassium;

(b) carbonates of magnesium or hydroxides of magnesium; and

(c) carbonates of calcium.

(2) The quantity of any one pH-adjusting agent referred to in paragraphs (1)(a) to (c) shall not exceed the maximum level of use for that agent set out in column III of an item of Table X to section B.16.100.

(3) The total mass of the pH-adjusting agents referred to in paragraphs (1)(a) to (c) shall not be greater in neutralizing value, calculated from the respective masses of those agents, than the neutralizing value of five parts by mass of anhydrous potassium carbonate for each 100 parts by mass of cocoa product, calculated on a fat-free basis.

Microbiological Requirements

B.04.012 No person shall sell a cocoa product or a chocolate product unless it is free from bacteria of the genus *Salmonella* as determined by official method MFO-11, *Microbiological Examination of Cocoa and Chocolate*, November 30, 1981.



Summary

Canadian food standard setting:

- Historic, based on incremental updates

Tends to follow Codex structure:

- Horizontal Standards: Safety
- Vertical Standards: Quality / Identity

Difficult to navigate, as rules are set under different laws

- Some of which are applicable everywhere
- Others for interprovincial trade and export only

Foundations of setting the standard are anchored in Codex guidance and risk analysis principles

Example: Standards for Additives

Submission based process

Requirements Set in the Regulations for Industry Submissions

- Technical benefit (technological function, effectiveness)
- Safety under the conditions of use proposed

Safety and Efficacy Assessment Conducted by Internal Evaluators

- Risk assessment according to JECFA guidelines
- Consultation with industry, CFIA
- Review of JECFA evaluations / decisions by other trading partners (EU, USA, Australia/NZ, Japan)

Multidisciplinary Review by Internal Experts and Recommendation

Publication in the List of Approved Food Additive Uses

Example of Standards/Requirements for Contaminants

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Issue Identification

- International issue
- New data collected
- Issue raised by stakeholder

Risk Assessment

- Leveraging/considering international findings and focusing on Canadian context (exposure considerations, food industry practices in Canada)

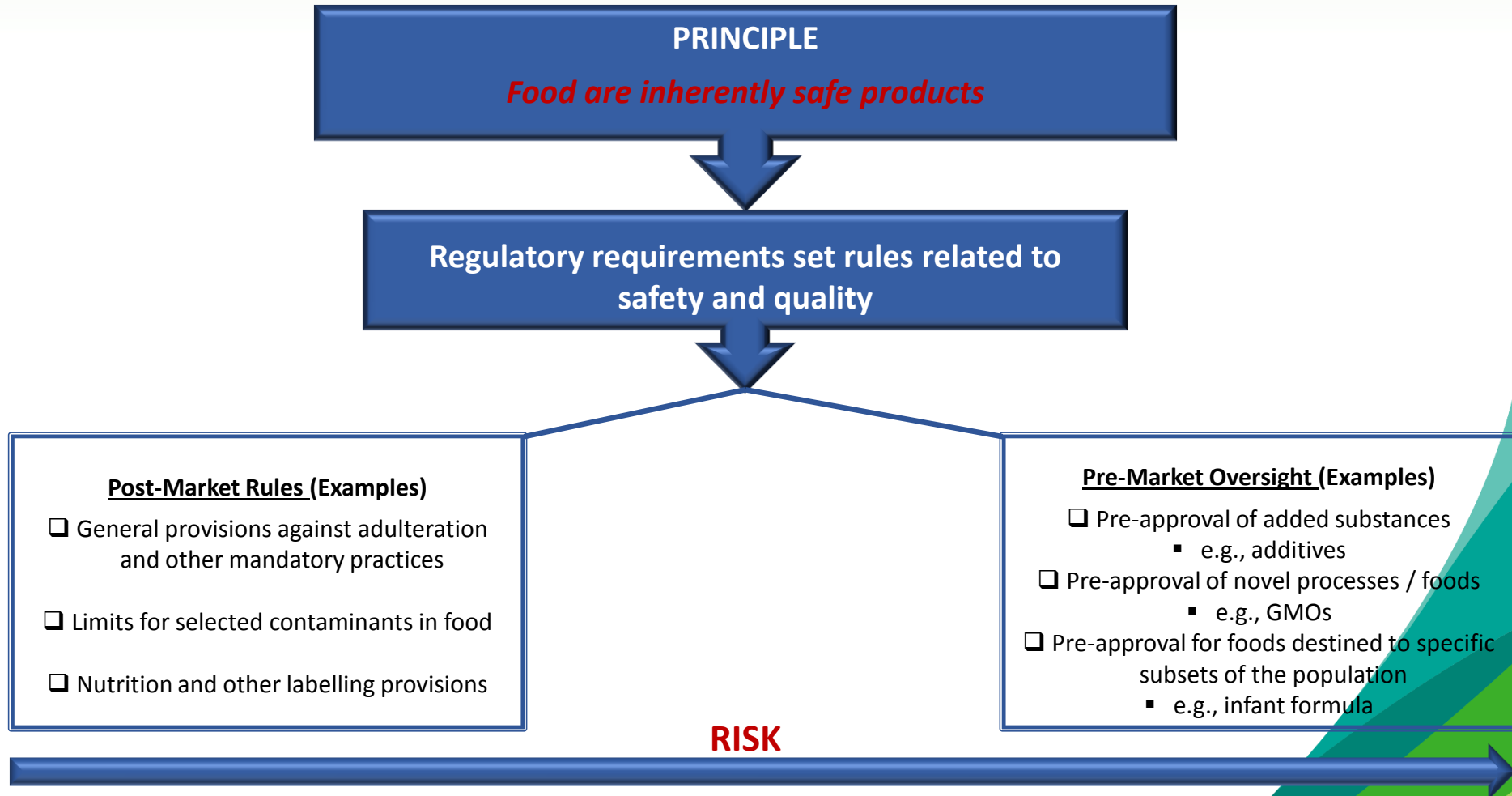
Risk Management

- Discussion of risk management measure (HC/CFIA risk management/policy committee) – includes international considerations / Codex standards



Pre-market vs. Post-market Obligations

How does the system operate to differentiate pre-market from post-market obligations:



Future Directions: Challenges and Opportunities

- ❑ System quite robust for foundational requirements
 - E.g. additives, contaminants, novel foods
- ❑ Difficult navigation for areas such as labelling, laboratory methods, microbiological requirements (requirements spread all over)
- ❑ Challenges in relation to technological changes / Not well equipped to address innovations
 - Packaging materials / formulations
 - Processing aids / enzymes
 - Functional foods
- ❑ Canadian food standard setting system aiming to move more towards preventive measures
- ❑ New rules for conditions of production mimic the US FDA FSMA with openness to accommodate private standards (in relation to food production and traceability)
 - E.g. GFSI-related standards



Food (Safety) Standard Setting Process: Foundations

Summary

- ❑ **Clear roles and responsibilities :**
 - Stemming from legislative / regulatory mandate
 - Stemming from a process / procedure for development, review and endorsement
 - Supports enforceability of the standard

- ❑ **Evidence-based foundation (science assessment needed for food safety)**

- ❑ **Collaborative Approach and Transparency:**
 - Engagement with stakeholders and impacted parties
 - Transparent approach for the set up and adoption of the standards



Working ... Regionally

Joint FDA / Health Canada Quantitative Assessment of the Risk of Listeriosis from Soft-Ripened Cheese Consumption in the United States and Canada: Report.

**Food Directorate / Direction des aliments
Health Canada / Santé Canada**

**Center for Food Safety and Applied Nutrition
Food and Drug Administration
U.S. Department of Health and Human Services**

July 2015



Application to a Regional Context

- ☐ Approach needs to rely upon (established) regional approach
 - Including a regional risk assessment
- ☐ Standards may be inspired from local and/or international developments
 - International / Codex standards
- ☐ Need to validate the approach to ensure it fits the regional approach
- ☐ Need to rely upon data that support regional / sub-regional assessments
- ☐ Need to ensure recommended standard is applicable throughout the region and / or identify exceptions as required



Thank You



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