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July 13, 2015

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Food Safety and Environmental Policy Branch
Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West,
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Guelph Ontario
N1G 4Y2

Re: Response to Consultation on
“Discussion Paper: Potential Changes to Provincial Maple Requirements
under the
Food and Safety Quality Act, 2001.”

Overview

The Christian Farmers Federation of Ontario (CFFO) is an accredited general farm organization operating in the province of Ontario, representing the interests of over 4,100 farm families in the province.

The Christian Farmers Federation of Ontario (CFFO) recognizes the potential for growth in the maple syrup and other related industries within Ontario agriculture. With this in mind, and recognizing the value of consistent food safety and production standards within the industry, the CFFO is in favour of many of the proposed changes within this discussion document.

In particular, the CFFO is in favour of keeping Ontario maple requirements in line with federal regulations, especially with respect to grading, sugar content, colour classification, labeling, and use of the term “maple” for products made strictly from concentration of maple sap. Recognizing that food safety and quality are an important foundation to success across the industry, the CFFO supports strengthening some of the current regulations in order to address key food safety and quality issues. Likewise, the success, consistency and safety of new innovative



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products should be encouraged by including these products within existing regulations, while at the same time paying close attention to the most appropriate regulations that should apply for each new product at each stage of production and processing.

Maple Syrup Grading, Colour Classification and Labelling

The CFFO supports moving Ontario regulations to be consistent with federal regulations in this area of maple production.

The CFFO is strongly in favour of including production or lot codes on labels, as well as province or country of origin. Production codes protect both the producer and consumer, and increase food quality and safety.

The CFFO is also in favour of moving to the federal standard of grading, colour classification, and taste descriptors, bringing Ontario in line with federal and international standards. However, there remain some reservations about the transition that will be required to adjust Ontario customers to the new system. Ontario customers, who are familiar with the current provincial system, are still the primary market for Ontario maple products. Many associate the term “golden” with other non-maple syrups such as corn syrup or cane-sugar-based golden syrup. Also, the term “amber” is already in use in Ontario, but for a different colour grade of maple syrup. It will be important to help consumers clearly understand the new system.

Likewise the CFFO would like to see Ontario remain consistent with federal regulations on the sugar content range of maple syrup. We see value in having both a minimum and a maximum Brix value to keep maple syrup production consistent across the province, as well as to ensure food safety and quality. The CFFO recommends the minimum should remain at the current federal standard of 66.0° Brix, and would be in favour of adopting the new federal standard of a maximum of 68.9° Brix.

Food Safety and Quality

The CFFO is in favour of strengthening some of the regulations governing food safety measures. In particular, it strongly supports requiring hot packing, as well as use of food grade containers. Both of these measures are important in ensuring and preserving the safety and quality of the product.

The CFFO supports regulations for minimum standards on equipment used where food safety is an issue. It is important to consider, however, that these regulations



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do not burden small producers with onerous costs for new or expensive equipment when their current equipment may still be suitable to meet food safety and quality standards.

At this time, the CFFO does not see value in requiring increased record-keeping or setting standards for personnel attire in maple production. The cost of complying with and enforcing such measures for both producers and regulators seems out of keeping with the benefits that might ensue.

Identification of Operations

The CFFO recognizes the value of the current regulations for those exporting outside of Ontario to register with the Canadian Food Inspection Agency (CFIA). Likewise, there are clear benefits to easy communication between OMAFRA and maple producers when safety issues arise, but also to convey new research or changes in regulations to producers. The CFFO supports registration of producers with OMAFRA on a voluntary basis, regardless of the size of the operation. Government already collects information on maple production through other channels, and mandating the creation of a new database would likely be more expensive than the benefits would merit.

Positioning Ontario for Growth

The CFFO is strongly in favour of Ontario retaining the current provincial regulations, and remaining consistent with the federal regulations on the use of the term “maple” only for products made from concentration of maple sap. This keeps labeling clear for consumers.

The CFFO supports the adoption of regulations for other new and innovative products such as birch or walnut syrup, and maple sap drinks. It makes sense, wherever possible, to include these under existing regulations where they are appropriate. Regulations similar to those for maple syrup production would be suitable for new tree sap based syrups. Maple sap drinks, however, may need to fit under existing regulations for sap collection protocols within the maple syrup regulations, but may be better regulated as a beverage in the production and bottling stage of the product, beyond the collection of sap.

Conclusions

Keeping Ontario consistent with federal regulations will position Ontario maple producers for growth, and allow for greater consistency across the industry. Standards for key aspects of maple production that help to ensure food quality and safety are beneficial for all producers and consumers. Mandating lot codes, hot



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packing and food grade containers will go a long way towards this goal. Appropriately including new and innovative products within relevant existing regulations will ensure product quality, safety and consistency, and allow these new products to prosper. The CFFO sees these as the foundation to a strong maple syrup industry in Ontario.

Thank you for this opportunity to provide our comments.

A handwritten signature in black ink that reads "Lorne Small".

Lorne Small, President
Christian Farmers Federation of Ontario