



18 September 2013

Dr. Bruce Archibald
President
Canadian Food Inspection Agency
Delivered by email: Bruce.Archibald@inspection.gc.ca

Dear Dr. Archibald,

Re: Regarding the definition of local in the CFIA Label Modernization Initiative

Congratulations on your appointment as President of the Canadian Food Inspection Agency at this important time in the Agency's history.

Food Secure Canada, a national network of organizations and individuals concerned with hunger, health and the sustainable production of food, commends the Canadian Food Inspection Agency for undertaking a public consultation on food labeling in Canada. The labeling of food is a vital service to Canadians who are increasingly concerned about having access to adequate and reliable information in order to assist them in deciding what foods to purchase. However, we are concerned that the complexities involved in the appellation "local" are not adequately captured in the current online consultation, open until September 27th.

The CFIA is responsible for ensuring that food labeling is neither misleading nor fraudulent. Language is clearly important. Our members have followed with keen interest the recent change in the definition of "local" at the CFIA. Right across the country, communities are undertaking innovative initiatives to support "local food". These range from farmers markets, to Community Supported Agriculture, to community food centres and student nutrition programs sourcing locally, to innovative public procurement projects, to local businesses featuring local produce. In fact, Food Secure Canada, in collaboration with the J. W. McConnell Foundation, runs a national network of organizations that are specifically exploring ways to make local and sustainable food businesses and non-profits more viable over the long term.

This level of interest is directly tied to the fact that "local" has become a widely used term to indicate a shorter supply chain with fewer links and the associated benefits such as revitalized local economies, smaller environmental footprints, greater agro-biodiversity, and fresher, healthier foods. The label "local", when attached to a product, in the minds of most Canadian consumers, has substantial and important resonance. The CFIA's new interim definition of local as provincial borders plus 50 km risks rendering the term meaningless, leading to more confusion and undermining our collective efforts to revitalize place-based economies and food systems through more sustainable practices.

An inappropriate definition of local at the CFIA could provide an unfair advantage to larger producers and retailers in the marketplace. The popular interest in local food has enabled small-lot producers to have more direct relationships with buyers and consumers, thereby enabling them to access markets where consumer demand exists. There is evidence that producers receive a greater share of retail prices and higher net revenue per unit in local food supply chains than they do in mainstream chains.

Community-based food systems contribute to community health, wealth, connection and capacity in the local economy. A definition of local that obfuscates the boundaries of regional economies and confuses the consumer will undermine the significant advances made in local food economies across Canada.

The impact of the change in the definition of local points to the need to effectively consult with those who built the market for it, namely small lot diversified farmers and the ever-growing food movement across Canada. These constituents are not generally represented by large industry groups nor by consumers associations, yet need to be engaged in the policy development related to local labeling. This will mean ensuring that consultations take place when farmers and fishers are not in their high demand seasons, and that civil society groups engaged in food system policy are brought into the consultation from the beginning.

Food Secure Canada encourages the CFIA to engage with our members and to make an extra effort to connect with the numerous small farm and sustainable fisheries organizations in Canada. We believe that such a consultation must go beyond a simple electronic questionnaire. Ultimately, such a discussion should take place within the context of the elaboration of a national food policy, as we called for in [Resetting the Table: A People's Food Policy for Canada](#). We are available to assist the CFIA and other government agencies to ensure that the local food movement's insights and experience are adequately reflected in your deliberations.

I thank you for your attention to this matter and look forward to discussing these and other matters related to the labeling of food at your convenience.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Diana Bronson', with a long horizontal line extending to the right.

Diana Bronson
Executive Director
Food Secure Canada