



## Risky Business

*Evaluating the risk could help set priorities on label registrations*

**A**S inspection systems around the world move even closer towards risk-based inspections, we should be asking ourselves whether or not Canada's current label registration process is keeping pace.

Have you registered a label lately? Ever since mandatory nutrition information first appeared in 2003 the process of registering labels for domestic and imported meat and poultry products and domestic processed fruit and vegetable products from registered Canadian facilities has stretched from a nail biting two weeks to a heart palpitating, anxious four to six weeks. In fact, these days it's best to assume it will be closer to six weeks, as this appears to be the "new normal." The resources of the Canadian Food Inspection Agency's (CFIA) label registration unit in Ottawa are obviously stretched. Maybe its time to rethink the purpose of label registrations and incorporate a bit of risk-based criteria.

The registration process involves a review of the label, along with the food's formulation and processing, a procedure that has been part of the Canadian way for many decades and one that was originally pegged on food safety. Today's food industry is vastly different than even a decade ago, so is this current process serving a valuable purpose?

There are also discrepancies in the process. For instance, if the registration of labels is rooted in food safety, then why are processed fruits and vegetables, such as canned peaches, from outside of Canada not obliged to be registered, while Canadian canned peaches produced in a federally registered facility are? The reasons are found in Canadian food law, but it is the rationale that's questionable. In other cases foreign processed fruit and vegetable products are required to go through a process similar to registration, but that's only the case when applying for a standardized size larger than the largest accommodated in the regulations.

On the other hand, certain products, such as low-acid canned foods and acidified foods exported to the U.S., do require their process to be filed with the U.S. Food and Drug Administration (FDA). In addition, the facility preparing such products must be registered with the FDA. This also applies to domestic U.S. products. But when U.S. products are exported to Canada there is no equivalent registration for these products in Canada. You have to wonder then if the

Canadian registration process covers all the needed bases.

The labels of meat and poultry products produced in a federally registered establishment, as well as all imported meat and poultry products, must be registered with the CFIA. This includes products with little meat content (two per cent) that are highly processed and of very low risk. Why then are such products required to be registered, while a salad dressing with real bacon bits is not? That's not to say salad dressings with bacon are a high-risk food, but that's just the point – many foods requiring registration are no more risky.

This isn't to say that the review process does not have any relevance in today's risk-based world. It just needs to be pointed in the right direction. Perhaps a generic registration model along the lines of the United States Department of Agriculture's can also serve us here. Low-risk products could be filtered out from the process, allowing the CFIA's label registration unit to focus on real priorities. Manufacturers of low-risk products, for example, could prepare the documents for registration, but would not necessarily need to submit them to the CFIA, so that when and where the CFIA finds a

need to review them they can. Perhaps manufacturers with a high degree of compliance could even be allowed greater opportunities for such generic registrations, again allowing the CFIA to focus on those that may have ongoing issues. This all sounds so easy, and really it doesn't have to be difficult. The process of registration would not be abandoned and neither would the expertise at the label registration unit, but the process would be more selective and focused on real safety priorities.

What may cause more controversy are the many foods that are not currently required to be registered or reviewed by the CFIA prior to sale. With greater co-operation between federal and provincial inspection systems and jurisdictional matters, there may be a time when manufacturers of higher-risk foods, such as low-acid foods, would be required to register their facilities and processes like Canadian firms have to do with the FDA when exporting to the U.S.

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