

June 20, 2022

Hon. Derek Johnson
Minister of Agriculture
minagr@leg.gov.mb.ca

Hon. Audrey Gordon
Minister of Health
minhealth@leg.gov.mb.ca

Dear Minister Johnson and Minister Gordon:

Keystone Agriculture Producers is writing to express our concern and the need for amendments on the proposed regulatory changes to the federal Food and Drugs Act. The federal Department of Health is planning on amending regulations in the Food and Drugs Act. This would require front-of-package labelling for products containing sodium, saturated fats, and/or sugars that are above a threshold level determined by Health Canada.

KAP is concerned that the proposed exemptions would negatively impact the beef and hog sectors. The proposed regulations exempt raw single ingredients such as steaks, ribs, roasts, pork chops, and pork tenderloins. The exemptions also encompass fresh fruits, milk and eggs. However, products such as ground pork or ground beef would not be exempt.

Not exempting ground beef or ground pork under the proposed regulations is based on an illogical argument. For example, cuts of chuck steak or round steak are often used to produce ground beef. These cuts sold individually would be exempt from labelling, however ground beef produced from either of these cuts would require a front-of-package label. This is despite the fact that both products derive from the same source and contain the same amount of saturated fat. The only difference is the outside appearance between round steak and ground beef.

The hog and beef sectors are important contributors to the Manitoba economy. In 2021 the sale of beef cattle generated \$629 million in cash receipts. In the same year the hog sector contributed \$1.4 billion to the economy. Health Canada's cost analysis in the Canada Gazette did not look at how the proposed regulations may impact the sale of products that require front-of-package labelling. This is concerning given the number of Manitobans that rely on these sectors for employment.

Keystone Agricultural Producers is asking the Minister of Health and the Minister of Agriculture to reach out to Health Canada and express concerns about the proposed regulations to the Food and Drugs Act. We request that ground products derived from beef or pork receive conditional exemption under the proposed regulations.

Sincerely,



Brenna Mahoney

General Manager, Keystone Agricultural Producers