



July 13, 2014

Food Regulatory Modernization
Canadian Inspection Agency
1400 Merivale Road, T1-4-327Ottawa, Ontario K1A 0K9
Email: cfia-Modernisation-acia@inspection.gc.ca

To Whom It May Concern:

On behalf of the Canadian Bottled Water Association (CBWA)¹ membership, thank you to the Canadian Food Inspection Agency for their work on *A New Regulatory Framework for Federal Food Inspection*.

CBWA is pleased to provide comments on *A New Regulatory Framework for Federal Food Inspection*.

Compliance with the key elements proposed in the regulations is part of the CBWA membership requirements. Members are required to meet standards outlined in the *CBWA Bottled Water Model Code*². For your convenience, a full copy of the CBWA Bottled Water Model Code is attached for your review.

In full cooperation with Agriculture and Agri-Food Canada, Health Canada and Canadian Inspection Agency, CBWA has developed supporting programs to assist bottlers in the compliance to the CBWA Bottled Water Model Code and to improve the safety and quality of bottled water manufactured and sold in Canada. In addition to the CBWA Bottled Water Model Code, these programs include: CBWA Food Safety Practices, CBWA Certified Plant Operator (CPO), CBWA Plant Audit Handbook³.

The proposed licence requirements for importing, exporting or inter-provincial trade would provide a clear comprehension into the food safety within each food sector. The validity period of two years is a short timeframe and could create challenge for small to medium sized companies if the process is cumbersome. With this in mind, the renewal process should be simple and manageable. If the cost associated with the licence (e.g., approximately \$250) are to be borne by industry, they must be equally borne by all licence holders. We look forward to consultation on the user fee proposal this summer.

¹ The CBWA is a trade association representing the bottled water industry in Canada since 1992. Our trade association represents bottled water producers, distributors, and suppliers from coast to coast in Canada. All members must comply with the CBWA Bottled Water Model Code, including passing to an annual third party inspection, ensuring our membership adhere to industry standards as outlined in the CBWA Bottled Water Model Code.

² CBWA Bottled Water Model Code; <http://www.cbwa.ca/index.php/resources/technical-training-tools>

³ CBWA Food Safety Practices, CBWA Certified Plant Operator (CPO), CBWA Plant Audit Handbook: <http://www.cbwa.ca/index.php/resources/technical-training-tools> and <http://cbwa-elearn.ca/>



Labelling and standard of identity are important to the bottled water industry, and CBWA would want to be directly involved in any change within Health Canada and/or Canadian Food Inspection Agency. Any consultation process to the Food and Drug Regulation, Labelling and Advertising and/or inspection requirements that impact the bottled water is of significant interest to CBWA.

Good guidance documents are vital to the successful implementation of the proposed regulations. We invite the CFIA to consult with CBWA's technical documents (2012) in the development of its regulatory guidance documents. CBWA's "living" documents are under regular review to ensure the current regulatory requirements are incorporated

CBWA supports the *A New Regulatory Framework for Federal Food Inspection*. CBWA's food safety system and preventive control plan requirements are in line with the SFCA regulatory framework. However, there is one area that CBWA would like clarification. In Annex 4, written PCP, are the hazards of concern for food safety hazards, and not food quality hazards?

We remain hopeful that with examples such as the SFCA regulatory framework, improvements will continue in a constructive and shared consultative process. CBWA board of directors, membership and staff are fully committed to engage in the regulatory process to make strong science based regulation that ensures the quality and safety of bottled water products, and protects the health of Canadians.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Griswold". The signature is written in a cursive, flowing style.

Elizabeth Griswold
Executive Director

cc: CBWA Board of Directors
CBWA Technical Committee

Attachments:
CBWA Bottled Water Model Code