October 23, 2026

Debbie Beresford-Green
Vice-President, Food Safety and Science
Canadian Food Inspection Agency
1400 Merivale Road
Ottawa, Ontario K1A 0Y9

Sent via email: Debbie.Beresford-Green@inspection.gc.ca

Dear Debbie,

Re: Mislabeling and Misleading Marketing of Imported Beef

On behalf of the Beef Farmers of Ontario (BFO) and our 19,000 members, we write to express growing concerns among beef producers and consumers regarding false and misleading product labels and advertising of beef products at Ontario retail locations.

BFO has identified concerns in two related but distinct areas. First, BFO has documented instances where beef products that are not sourced from Canada appear to have been presented with a "Product of Canada" claim, raising concerns about compliance with the requirements for this designation. Second, BFO is concerned about imported beef products that may be technically labelled with their origin but are marketed and advertised in a manner that may create an overall impression that the product is Canadian. Supporting examples of both concerns are provided in the attached appendix.

BFO wishes to emphasize that we are not opposed to imported beef being sold in Canada or appearing on grocery store shelves. We recognize that imported beef is part of the Canadian marketplace. Our concern is that consumers must be provided with clear, accurate, and transparent information about the origin of the beef they purchase, so they can make informed decisions. Consumers should not be misled, whether through inaccurate labelling or the overall presentation of advertising and promotional materials, into believing that imported beef is Canadian.

BFO is concerned about cases identified in grocery stores where beef products appear to be labelled as "Product of Canada" despite indications that they may not meet CFIA requirements for this designation. One example included in the appendix involves beef identified as originating from Mexico that also appears to carry a "Product of Canada" claim. BFO recognizes that a determination of non-compliance requires CFIA's assessment of the product and its labelling. We are therefore requesting that CFIA review this example and advise whether the labelling complies with applicable requirements. These cases raise serious concerns about compliance and

enforcement and warrant attention to ensure that Canadian consumers are provided with accurate and transparent information about the origin of the beef they purchase.

The concerns identified by BFO extend beyond individual member observations and reflect broader public attention to the accuracy and clarity of origin claims in the Canadian marketplace. Recent media coverage has also highlighted concerns regarding products represented as Canadian despite being sourced elsewhere. For example, a recent article titled "'It's not right': Ontario woman finds blackberries from the U.S. labelled as 'Product of Canada'" demonstrates the broader consumer concern surrounding the accuracy and transparency of origin information.[1]

BFO is also concerned about the use of Canadian imagery, symbols, and messaging in association with imported beef products in a manner that may lead consumers to believe that the product is Canadian, particularly where the actual origin is disclosed only in small or less prominent print. Examples include the prominent use of Canadian flags and maple leaf imagery in advertising and promotional materials, as well as messaging that encourages consumers to support Canadian goods and products.

When these elements are presented alongside imported beef, they may contribute to an overall impression that the product is Canadian. Unlike instances of potentially incorrect product labelling, these examples raise questions about whether the overall presentation of advertising and promotional materials may be misleading, even where individual origin declarations are technically accurate.

BFO believes this issue is particularly important because consumers should not have to interpret fine print or distinguish between Canadian imagery and an actual Canadian-origin claim to understand where their beef came from. Consumers who choose Canadian beef should be able to do so with confidence and have clear, accurate, and readily identifiable information regarding the origin of the product they are purchasing.

This concern also applies to the CFIA inspection mark featuring the maple leaf. BFO recognizes that the presence of the mark does not, in itself, indicate that a product is of Canadian origin. However, when the mark appears alongside other Canadian imagery, symbols, or marketing language, BFO is concerned that consumers may interpret the overall presentation as indicating that the product itself is Canadian.

To be clear, BFO is not requesting changes to the CFIA inspection mark itself. Rather, we are seeking clarification on how CFIA considers the use and presentation of its inspection mark alongside other Canadian marketing or imagery when assessing whether the overall presentation of an imported product could mislead consumers about its origin.

Under subsection 5(1) of the Food and Drugs Act, food must not be labelled or advertised in a manner that is false, misleading, deceptive, or likely to create an erroneous impression regarding its character, composition, merit, or other attributes.[2]

The CFIA's General Principles for Labelling and Advertising further explain that all elements of a label or advertisement, including words, pictures, logos, and symbols, contribute to the overall impression created about a product. Therefore, the assessment is based not only on individual elements, but also on how they appear together.[3]

This is particularly relevant to the use of a maple leaf. The CFIA states that a maple leaf does not automatically mean a food is Canadian. It may indicate Canadian ingredients, labour, a Canadian company, or compliance with a Canadian standard. However, the way the maple leaf is presented can change its meaning. If the overall presentation reasonably creates the impression that a product is a "Product of Canada," the product must meet the applicable legal requirements for that claim.[4]

BFO believes this principle should be applied consistently to imported beef products and their associated advertising and promotional materials. A product's origin should not be disclosed in a manner that is technically present but effectively overshadowed by more prominent Canadian flags, imagery, messaging, or promotional language that may lead consumers to believe the product is Canadian.

BFO is concerned about the potential impact of these practices on the Ontario beef sector. When consumers are misled into believing that beef they have purchased is Ontario or Canadian beef when it is not, whether through mislabelling or misleading advertising, there is a risk that their experience could negatively influence their perception of Ontario or Canadian beef more broadly. This could undermine consumer confidence in the quality and standards associated with Ontario and Canadian beef, despite the efforts of Ontario beef producers to consistently uphold high standards of production and quality. These practices may also create an unfair competitive disadvantage for Ontario beef producers by potentially diverting consumer purchases away from genuinely Canadian beef products and undermining the value of Canadian-origin marketing.

BFO believes that consumers should be provided with clear, accurate, and readily identifiable information regarding the origin of the beef products they purchase. Canadian imagery and marketing language should not, intentionally or otherwise, create an overall impression that an imported product is Canadian. More importantly, products that do not meet the requirements for a "Product of Canada" claim should not be marketed or labelled as such.

BFO would appreciate CFIA's review of the examples provided in the attached appendix and a response addressing the following:

1. Whether the examples involving potentially incorrect "Product of Canada" labelling comply with applicable requirements and, where non-compliance is identified, what corrective or enforcement measures may be appropriate.

2. How CFIA assesses the overall impression created by Canadian flags, imagery, symbols, and marketing language in retail advertising and promotional materials, particularly where imported products are included and their actual origin is disclosed less prominently.
3. What steps CFIA will take to provide clearer, more proactive guidance to retailers regarding the use of Canadian promotional messaging alongside imported products, including the prominent placement of Canadian flags, imagery, and wording in close proximity to products that are not Canadian in origin.
4. How CFIA intends to address situations where retailers may technically comply with origin labelling requirements but deliberately use advertising, imagery, or promotional messaging to create the misleading impression that imported products are Canadian, including the use of appropriate penalties and enforcement measures where violations are established.

BFO believes CFIA must take a more proactive role in educating retailers about their responsibilities and ensuring that compliance extends beyond the technical accuracy of individual product labels to the overall impression created by advertising and promotional materials. Retailers should not be permitted to use Canadian flags, imagery, and messaging in a manner that deliberately misleads consumers about product origin simply because the correct origin appears elsewhere in smaller print. Where CFIA determines that these practices constitute false or misleading advertising, particularly where there is evidence of deliberate or repeated conduct, BFO urges the agency to pursue meaningful enforcement action, including penalties where warranted, to discourage these practices.

Sincerely,



Jason Leblond
President

References

[1] https://www.ctvnews.ca/toronto/consumer-alert/article/ontario-woman-upset-to-find-blackberries-from-the-us-labelled-as-product-of-canada/
[2] https://laws-lois.justice.gc.ca/eng/acts/F-27/page-2.html#h-234067
[3] https://inspection.canada.ca/en/food-labels/labelling/industry/general-principles#a2
[4] https://inspection.canada.ca/en/food-labels/labelling/industry/origin-claims#c5

Appendix - Examples of Potentially Incorrect Labelling and Misleading Marketing of Imported Beef in Ontario

The examples included in this appendix are provided to support CFIA's review of the concerns outlined in BFO's accompanying letter. BFO is not asserting that each example constitutes a confirmed regulatory violation, recognizing that such determinations are the responsibility of CFIA. However, regardless of whether individual examples constitute regulatory violations, BFO believes they reflect a broader and concerning trend in retail labelling, advertising, and promotional practices that may, intentionally or unintentionally, mislead consumers about the origin of beef products. These examples underscore the need for greater clarity, guidance, and oversight to ensure consumers are provided with accurate and transparent information when making purchasing decisions.

Example 1: Mexican Beef Displayed with a "Product of Canada" Claim



Observation: A retail display identifies the beef as originating from Mexico, while the accompanying price label appears to include a "Product of Canada" designation. The apparent inconsistency between the product's identified origin and the Canadian-origin claim is a blatant example of mislabeling.

BFO requests that CFIA review the example and determine whether the labelling complies with existing regulatory requirements.

Example 2: Canadian Promotional Messaging Alongside Australian Beef





Observation: Retail promotional materials feature prominent Canadian messaging, including maple leaf imagery and statements such as “Proudly Supporting Canada” or “Proudly Canadian,” alongside beef products identified as Australian. Prominent Canadian-themed messaging could create an overall impression that the advertised beef is Canadian, particularly where foreign-origin information is less prominent. BFO requests guidance on how CFIA assesses the overall impression created by Canadian promotional messaging alongside imported beef and what guidance retailers are provided when Canadian imagery and references are used alongside single ingredient imported products.

Example 3: U.S.-Origin Beef Marketed with Canadian Grading Label



Observation: A photograph of beef packaging and accompanying commentary identifies the product as U.S.-produced beef marketed with a Canadian grading reference.

BFO recognizes that grading and country origin are distinct attributes. However, the Canadian AAA label paired with the Product of USA label creates misalignment.

BFO requests that CFIA review the example and determine whether the labelling complies with existing regulatory requirements.

Example 4: New Zealand Beef Prepared in Canada and Displaying a Canadian Inspection Mark



Observation: The package identifies the beef as a "Product of New Zealand" and indicates that it was prepared in Canada. It also displays a Canadian inspection mark featuring a maple leaf.

BFO acknowledges that the foreign origin is disclosed and that the Canadian inspection mark does not establish Canadian origin.

BFO requests clarification on how CFIA evaluates the overall presentation of imported beef packaging that includes Canadian inspection marks, particularly when combined with other Canadian promotional messaging or imagery.