



Canadian Food  
Inspection Agency

Agence canadienne  
d'inspection des aliments

**To: Canadian Food Distributors, Packers, Importers and Wholesalers**

**Subject: Undeclared Allergens and Acceptability of Post Harvest Protective Coating Treatments**

Protective edible coatings and waxes are part of the post-harvest and handling technologies routinely used by the fresh produce industry to minimise moisture loss, prolong the shelf life, and to improve the appearance of fresh produce.

The CFIA reminds the industry to be aware of most common priority allergens such as peanuts; tree nuts; sesame seeds; milk; eggs; soy; fish and shellfish, crustaceans; wheat; gluten; and sulphite. These priority allergens and any proteins derived from them should not be used as components of fruit and vegetable coatings because there are no labelling requirements to declare coating or wax components on the fresh produce. Therefore there would be no warning for an allergic consumer about the presence of these priority allergens on the fresh produce.

The CFIA recommends that Canadian food importers, distributors, packers, and growers consult technical specifications and list of ingredients of a coating or wax product, before purchase and its application to fresh produce. This step may prevent introduction of priority allergens into fresh fruits and vegetables.

Some wax and coating products may be generally recognised as safe for food contact application in the U.S. however, the product must also comply with the Canadian Regulatory requirements and be acceptable for use in Canada.

In Canada, components of fruit and vegetable coatings are not regulated as food additives (with the exceptions of mineral oil, paraffin wax and petrolatum) and, as such, there is no provision under the *Food and Drugs Act and Regulations* that would require a coating manufacturer to submit its coating formulation to Health Canada for review. Coating manufacturers and importers, however, have a obligation under Section 4(a) of the *Food and Drugs Act and Regulations* to ensure that all coating formulations marketed for use on produce will not pose a health hazard to consumers.

Wax and coating manufacturers, and importers may voluntarily submit information on the composition and the use of its coatings to Health Canada for review. Health Canada will offer advisory opinions on the acceptability and safety of individual coating preparations.

**Canada**

For more information on applying for an advisory opinion, please contact:

Chief  
Chemical Health Hazard Assessment Division  
Bureau of Chemical Safety  
A.L. 2201B1  
Health Canada  
K1A 0L2  
Telephone (613) 957-1700  
Facsimile (613) 990-1543

For more information concerning Canada's priority allergens, please refer to the CFIA's Bureau of Food Safety and Consumer Protection Fair Labelling Practices Program website at:

<http://www.inspection.gc.ca/english/fssa/labeti/allerge.shtml>

For more information on Health Canada's proposed enhanced allergen labelling regulations please visit Health Canada's website at:

[http://www.hc-sc.gc.ca/food-aliment/friia-raaii/food\\_drugs-aliments\\_droques/e\\_allergy\\_label\\_letter.html](http://www.hc-sc.gc.ca/food-aliment/friia-raaii/food_drugs-aliments_droques/e_allergy_label_letter.html)