

**Voluntary Report** – Voluntary - Public Distribution

**Date:** April 15, 2024

**Report Number:** CA2024-0014

**Report Name:** Canada Updates on Sulfur Dioxide Used on Fresh Grapes During Storage and Transport

**Country:** Canada

**Post:** Ottawa

**Report Category:** Fresh Deciduous Fruit, FAIRS Subject Report

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**Report Highlights:**

The Canadian Food Inspection Agency updated its labeling requirements for fresh grapes and the use of sulfur dioxide gas on fresh grapes during storage and transport – a result of the reclassification of sulfur dioxide when used under different scenarios. Sulfur dioxide gas used during storage and transport of prepackaged fresh grapes in containers other than consumer prepackaged (i.e. shipping or master containers) is considered to be a food additive and sulphites must be declared on the list of ingredients.

Health Canada has completed its assessment of an industry stakeholder request concerning the use of sulfur dioxide (SO<sub>2</sub>) gas on fresh grapes during storage and transport. As a result of this assessment, there has been a reclassification of sulfur dioxide under certain scenarios. The Canadian Food Inspection Agency (CFIA) has updated the [labeling requirements](#) for fresh grapes accordingly.

When sulfur dioxide is used during storage and transport of prepackaged fresh grapes, other than consumer prepackaged (i.e. shipping or master containers), CFIA classifies sulfur dioxide as a food additive. This results in the requirement to have sulphites declared on the list of ingredients. This requirement to declare sulphites is mandatory, regardless of the concentration.

For consumer prepackaged fresh grapes at retail, the requirement to declare sulphites on the list of ingredients if the fresh grapes were treated with sulfur dioxide gas is based on the residual level of sulphites present on the grapes at time of retail. This is a result of CFIA classifying sulfur dioxide as either a food additive or a processing aid based on the residual level of sulphites. The requirements for labeling on the ingredient list are:

- Sulphites **must be declared** on the label when the residual concentration on fresh grapes at retail is **10 parts per million (ppm) or higher**.
- Sulphites are **not required to be declared** on the label when the residual concentration on fresh grapes at retail is **less than 10 ppm**.

*Source: CFIA*

Table 1- Canadian requirements for declaration of sulphites for fresh grapes.

	<b>Sulphites Must Be Declared</b>	<b>Sulphites Are Not Required to Be Declared</b>
Prepackaged, other than consumer prepackaged	Sulfur dioxide was used during storage and transport	Sulfur dioxide was not used during storage and transport
Consumer prepackaged	Residual concentration of sulphites is 10 ppm or higher	Residual concentration of sulphites is less than 10 ppm

Canada currently does not have a regulatory definition for food processing aids. Health Canada's Food Directorate does define a food processing aid as a substance that:

- is used for a technical effect in food processing or manufacture.
- when used, does not affect the intrinsic characteristics of the food.
- when used, results in no or negligible residues of the substance or its by-products in or on the finished food.

*Source: Health Canada*

Accordingly, food processing aids are not considered to be ingredients nor are they required to be declared on prepackaged food labels under the [Food and Drug Regulations](#). Food additives, however, are considered to be ingredients and do have regulatory requirements concerning approved uses, labeling, and declaration. Health Canada's [Policy for Differentiating Food Additives and Processing Aids](#) provides guidance on determining whether a substance would be considered as a food additive or processing aid in Canada. Canada maintains a general requirement under the *Food and Drug Regulations* that sulphites must be declared when the concentration of sulphites within a prepackaged product is 10 ppm or higher.

Questions related to Health Canada's reclassification of sulfur dioxide gas used for storage and transport of fresh grapes can be directed to the Bureau of Chemical Safety: [bc-s-bipc@hc-sc.gc.ca](mailto:bc-s-bipc@hc-sc.gc.ca)

**Attachments:**

No Attachments.