

Direct Marketing Your Food Product



Direct Marketing Food Products

The importance of public trust in the way food is produced is increasing. Recognizing the opportunity to build a trusting relationship, some food producers are focusing on direct marketing their products to consumers.



This fact sheet focuses on what direct marketers of food products in Manitoba need to know to meet the legal requirements for production, processing and marketing of food products in Manitoba. Extending direct marketing outside of the province may have additional requirements to meet.

There are a variety of ways to direct market your food products. All methods are based on developing a relationship with the end consumer.

Examples of direct marketing include:

- selling to end consumers from your farm or home (delivery and meeting at a pre-arranged location is also allowed)
- community supported agriculture (CSA) programs
- farmers' markets, direct sales to restaurants and stores, internet sales and collaborative marketing with other direct marketers of food products

Direct marketers need to be aware of registrations, allowable production levels, grading requirements, processing facility standards (if processing in a government inspected facility), safe food handling practices and labelling requirements. This fact sheet is a summary of the requirements; the actual regulations should be followed in case of discrepancy.

Direct Marketing Outlets

Selling to end consumers

Producers that sell their food products directly to end consumers often do so from their farms or other business locations including u-pick operations or processing facilities. Some producers also have different delivery or pick up options available. Sometimes end consumers pay in advance, like CSA arrangements where end consumers prepay for a share of product to be delivered throughout the season and sometimes end consumers pay at the time of transaction. Only specific farm products (whole fruits and vegetables, honey, ungraded eggs and whole eviscerated poultry) can be sold directly to end consumers without requiring government oversight.

It is important to remember to follow safe food handling practices during production, transportation and storage of all food products.

Products produced in a government inspected facility such as a community kitchen, may be sold by any means, including to the end consumer, retail or online.





Farmers' markets

Farmers' markets are popular destinations for consumers looking to source locally grown and made food products. They are a place where consumers can interact with food producers and processors to ask questions about the products they have for sale.

Farmers' markets are permitted operations that take place at specified times and locations to provide vendors an opportunity to sell specific products directly to the public. They are sometimes used to test new products to gauge interest before developing or expanding a business. They operate under a unique set of guidelines that allow for the sale of some food products that do not meet the requirements for sale through other marketing outlets.

These guidelines allow specific prepared food products (e.g., jams, breads, pickles) to be made in a facility (e.g., home kitchen) that is not subject to government inspection and sold to the public. The guidelines apply not only to traditional farmers' markets, but also to events such as craft and bake sales and flea markets.

Except for farmers' markets (and other events that fall under these guidelines), all processed food sold to the public must be made in a government inspected facility. For more information, go to: **www.manitoba.ca/health** and search for ***Manitoba Farmers' Market Guidelines***.



Collaborative marketing and distribution

Sometimes, food producers work together to be more efficient in getting their products to consumers. These collaborative marketing strategies are helping individuals be more competitive and take full advantage of market opportunities.

Collaborative marketing strategies, where more than one producer work together to sell their products, are increasing in popularity, and it is important that collaborative strategies are developed to meet regulatory requirements, including fitting in with supply managed industries and ensuring safe food.

When direct marketers engage in collaborative marketing, all food products except for whole fruits and vegetables need to be processed in government inspected facilities. Partnerships, shared arrangements, producer co-ops, multi-farm CSAs and food hubs are examples of collaborative marketing models that direct marketers are using to extend their reach to new markets.

Common Food Products Direct Marketed in Manitoba

Processed foods

- All processed foods (including jams, jellies, pickles and baked goods) must be made in a government inspected facility to be direct marketed (except for non-potentially hazardous foods sold at farmers' markets).
- People that process foods in government inspected facilities that they do not own (e.g., commercial community kitchen) must also have their own permit (except for non-potentially hazardous foods sold at farmers' markets).
- All prepackaged foods must meet federal labelling requirements.



Fruits and vegetables

Whole fruits and vegetables can be sold without a permit freely throughout the province. Any cutting or other processing of fruits and vegetables must take place in a government inspected facility.

Poultry

Poultry, including waterfowl, that is not sold directly to end consumers, must be processed at a government inspected facility. Uninspected poultry may not be sold to restaurants or retail establishments.

The following criteria must be met for the sale of uninspected poultry:

- Sale must be by the producer who raised the birds and sold directly to the end consumer.
- The birds must be whole and eviscerated (no further processing or cutting up allowed).
- Must be labelled with the name and address of the producer and include the words Not Government Inspected.
- Direct sales to end consumers can take place at the farm, be delivered or picked up at an arranged location that is not a farmers' market, public market or retail outlet.
- Poultry must be transported and stored to maintain the product's internal temperature at five degrees Celsius or lower.
- A limit of 999 chickens and 99 turkeys can be produced in a calendar year if you are not a registered chicken broiler or turkey producer.
- There are no production limits for other types of poultry or waterfowl.



Eggs

- Grading eggs can only take place in a government inspected facility.
- To grade chicken eggs the facility must be federally registered. Government inspected facilities for other types of eggs may be permitted provincially.
- Egg producers may sell ungraded eggs to end consumers at the farm gate or at a farmers' market, with the option to deliver later, but may not sell ungraded eggs to restaurants or retail establishments.
- Ungraded egg containers must be labelled with the name and address of the producer, date of packaging and the words "ungraded eggs".
- Eggs must be transported and stored at a temperature of four degrees Celsius or lower until consumed.
- Unregistered chicken egg producers may only keep a maximum of 300 laying hens.
- Production limits exist for chicken egg production only; other egg producers are not limited

Meat and meat products

- For someone to sell meat that was processed in government inspected facilities that they do not own, a permit is required.
- All red meat (includes beef, pork, lamb, goat, bison, rabbit, etc.) must be processed in a government inspected abattoir to be sold.
- All meat and meat products to be sold must be made from carcasses that have passed government inspection.
- All meat products must be made in a government inspected facility.
- Meat and meat products must be transported and stored to maintain the product's internal temperature at five degrees Celsius or lower.

See the **meat hawker guidelines** on www.manitoba.ca/health.



Dairy

- It is illegal to sell raw milk (unpasteurized) in Manitoba.
- To produce cow's (bovine) milk for sale, you must be a registered producer with the Dairy Farmers of Manitoba and hold dairy quota.
- To operate a dairy farm that produces milk for sale from any non-bovine species, including goats, you must be registered with Manitoba Agriculture.
- All processing of milk and dairy products for sale must take place in a government inspected facility.

Honey

- To keep bees, you must register with the Manitoba government.
- Honey that is sold from farm gate does not need to originate from a government inspected facility.
- All honey sold at a location other than producer's farm gate needs to be graded.
- Honey must originate from a federally registered establishment in order to be labelled with a grade
- All honey sold in a retail location must be labelled with a grade.
- Unpasteurized honey may be sold.
- Pasteurized honey must be labelled as pasteurized.



Glossary

Farmers' market: is a short-term operation for the sale of prepared food products under the direction of a designated operator. It also covers other types of temporary food markets such as flea markets, craft sales, bake sales and other such establishments.

Meat: means all parts (including viscera) of slaughtered cattle, sheep, swine, horses, poultry or other animals, not including fish, which are intended for use as human food.

Meat products: means any food for human consumption of which one of the constituents of that food is meat.

Meat hawker: refers to the third-party sale of meat and meat products that originate from an approved meat processing plant.

Non-potentially hazardous food: means any food that **does not** consist in whole or in part of milk or milk products, eggs, meat, poultry, fish, shellfish, edible crustacea or other ingredients, including synthetic ingredients, in a form capable of supporting rapid and progressive growth of infectious or toxigenic microorganisms.



Resources

Food regulation

Manitoba Agriculture – www.gov.mb.ca/agriculture/food-safety/regulating-food/index.html

Manitoba Agriculture – <https://web2.gov.mb.ca/laws/statutes/ccsm/f047.php?lang=en>

Food safety

Manitoba Health, Seniors and Long-Term Care – www.gov.mb.ca/health/publichealth/environmentalhealth/protection/food.html

Manitoba Agriculture – www.gov.mb.ca/agriculture/food-safety/education-resources/index.html

Manitoba Agriculture – www.gov.mb.ca/agriculture/food-safety/food-safety-ungraded-eggs.html

Frequently Asked Questions

- Q.** Can chefs or restaurants purchase products at farmers' markets and use them in dishes that are served to their customers?
- A.** Yes. Fresh fruits and vegetables can be sold. Also, products made in a government inspected facility can be purchased and used. Products made in facilities that are not government inspected cannot.
- Q.** Can a restaurant, store or processor purchase uninspected poultry or ungraded eggs direct from the producer and use them in dishes or products that will be served or sold to their customers?
- A.** No. All chicken and eggs sold in stores or used by restaurants and processors must come from government inspected facilities.
- Q.** Are there differences between non-potentially hazardous products like the breads, jams, jellies or pickles that are sold at farmers' markets and similar products found in grocery stores?
- A.** Non-potentially hazardous products at a farmers' market may have been made in a facility that is not government inspected. All products for sale in a retail establishment like a grocery store must come from an inspected facility.
- Q.** What is considered a pickle in the farmers' market guidelines?
- A.** Pickles are vegetables and fruits pickled in vinegar based brines, with a finished pH of 4.6 or below.
- Q.** Can products processed in facilities that are not government inspected be sold on the internet or through social media?
- A.** No. The only place non-potentially hazardous foods processed in facilities that are not government inspected can be sold is a farmers' market. Vendors may advertise on the internet or through social media, but sales of these products must take place at a farmers' market.
- Q.** Can uninspected chickens be bought or pre-ordered at a farmers' market?
- A.** uninspected chickens cannot be purchased at a farmers' market but can be pre-ordered. Although pre-ordering can be done at a farmers' market, the delivery of product from producer to end consumer cannot take place at a farmers' market.
- Q.** Do prepackaged foods sold at farmers' market need to include nutritional labelling?
- A.** Prepackaged foods sold only at a farmers' market by the individual who prepared and processed the product are usually exempt from carrying a Nutritional Facts Table. There are certain conditions in which a food loses this exemption. (see <https://inspection.canada.ca/en/food-labels/labelling/industry/nutritionlabelling/exemptions>)
- Q.** Can processed products be purchased directly from vendors who sell at farmers' markets at places other than the farmers' market?
- A.** This is only allowable if the vendor produced the product in a government inspected facility and all labelling requirements are met for retail sale. Non-potentially hazardous foods produced in a facility that is not government inspected, can only be sold at a farmers' market.
- Q.** Do milled grain products like rolled oats or flours need to be milled in permitted facilities to be sold?
- A.** A farmers' market is the only place cereal products such as ground, rolled or milled grains can be sold if they are prepared in facilities that are not government inspected.

For more information

- Go to manitoba.ca/agriculture and click on Local Food
- Email us at localfood@gov.mb.ca