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Introduction

While it is Health Canada that develops the nutrition labelling regulations, it is the Canadian Food Inspection Agency that is responsible for enforcing the regulations. On December 14, 2016, the Canadian Minister of Health announced amendments to the Food and Drug Regulations to make the Nutrition Facts table and list of ingredients on packaged foods easier for Canadians to use and understand.

The changes have been put in place for four main reasons:

1) to reduce sodium in processed foods

2) to eliminate industrially produced trans-fat

3) to provide consumers with more information about sugars and food colours

4) to introduce restrictions on the commercial marketing of unhealthy foods and beverages to children

A five-year transition period has been established for industry to meet the new requirements.

This guide presents an overview of these changes, whilst giving a general outline of Canadian labelling legislation. Labels and their ingredients’ list are subject to many requirements spanning beyond the scope of this simplified guide. Although most requirements stated come from the Canadian legislations, some requirements also come from other sources, such as the Canadian Food Inspection Agency (CFIA). LAT Multilingual has prepared this documentation in an effort to help you navigate the complexities of this ever-changing landscape. We take no responsibility for any problems/errors in label design resulting from using this guide.
Canadian Labelling Law
Non-food products

Labels must display:

1) **Product Identity**

2) **Product Net Quantity**
   The net quantity should be:
   - in metric units of volume, when the product is a liquid, a gas, or is viscous;
   - in metric units of weight, when the product is solid;
   - by numerical count when the product is sold by individual units
   The numerical portion of the net quantity declaration must be in bold
   There are also minimum type heights depending on the size of your principal display surface (see table below)

3) **Dealers Name and Principal Place of Business** (this can be located anywhere on the outside surface of the package except the bottom)

If you are importing a prepackaged product that has been manufactured or produced in a country other than Canada, you need to include the name and address of a Canadian dealer preceded by the words "imported by/importé par" or "imported for/importé pour" or the name and address of the dealer outside Canada.

<table>
<thead>
<tr>
<th>Area of Principal Display Surface*</th>
<th>Minimum Type Height</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not more than 32 cm² (5 in²)</td>
<td>1.6 mm (1/16 in)</td>
</tr>
<tr>
<td>More than 32 cm² (5 in²) but not more than 258 cm² (40 in²)</td>
<td>3.2 mm (1/8 in)</td>
</tr>
<tr>
<td>More than 258 cm² (40 in²) but not more than 645 cm² (100 in²)</td>
<td>6.4 mm (1/4 in)</td>
</tr>
<tr>
<td>More than 645 cm² (100 in²) but not more than 25.8 dm² (400 in²)</td>
<td>9.5 mm (3/8 in)</td>
</tr>
<tr>
<td>More than 25.8 dm² (400 in²)</td>
<td>12.7 mm (½ in)</td>
</tr>
</tbody>
</table>

*Minimum type heights for net quantity, depending on size of display surface.
Source: http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/01248.html
Food products

Labels require:

- Common name
- Net quantity declaration
- Dealer name and address (same regulations as for non-food items)
- List of ingredients (including food allergens)
- Durable life date
- Nutrition Facts table (see below)

By law, the nutrition facts table gives information on:

- Serving size
- Calories
- Nutrients
- Percent daily values (% DV)
- Ingredients list, which lists all the ingredients in a food by weight (this begins with the ingredient that weighs the most and ends with the ingredient that weighs the least)

Don’t forget, if you make a claim on your package such as “high in calcium”, you must list the amount of the vitamin/mineral that is present in the nutrition facts table to back up your claim.

Bilingual requirements

All mandatory information must be in both official languages of Canada: English & French.

- Numbers are considered bilingual
- Measurements must be converted to the metric system

There are a few cases in which you do not need bilingual labelling:

- The identity and principal place of business can be in either English or French
- Shipping containers that are not sold to consumers
- Local products (defined as food that is sold only in the local government unit in which it is manufactured, processed or packaged and in a local area in which English or French is the mother tongue for less than 10% of the residents) (see image)
- Official test market products (temporary exemption)
- Specialty foods (e.g. foods that have special religious significance, and are used in religious ceremonies)
- Products in which knowledge of the language is essential to its use (for example: books or greeting cards) can appear in the appropriate language (Non-food products only)
- Information outside of the must-haves (for example: slogans or usage directions) does not have to be bilingual (but it is encouraged)
Not to forget, that with all of these labels there are also very strict stipulations regarding font size/height/bolding/spaces.

Illustrating a ‘local’ product, and the areas in which it may and may not be sold.
Québec’s French language requirements

If you’re taking the trouble to adapt your labels to meet the Canadian market requirements, you may want to make sure you also meet Quebec’s language requirements. The latter are a bit stricter, but going this extra mile will be well worth it. Quebec represents a market of over 7 million customers who are known for their epicurean life style and brand allegiance. If your brand succeeds in conquering the heart of customers in Quebec, your efforts will be well rewarded.

The Charter of the French Language, also known as Loi 101, enforces strict rules about the use of various languages within Quebec’s borders.

French must be included on all forms of labels and communication. This includes:

- All product labels, containers, and accompanying documents (eg. warranty, directions, etc.) (If there are multiple languages on a product label, French must have “greater prominence” than the other languages)
- Menus and wine lists
- Marketing materials (eg. catalogues, brochures, folders, commercial directories etc.)
- Computer software (including game software and operating systems)
- Contracts
- Employment application forms, order forms, invoices, receipts, etc.
- Public signage, posters, and commercial advertising
- Brand names
- Toys or games that require the use of non-French vocabulary for their use are forbidden unless there is an equivalent French product available on the Quebec market (Charter of the French Language, Section 54)
What’s changed in the labelling amendments?

Various changes in the labelling amendments apply to food products:

- Nutrition facts table
- List of ingredients
- Serving size
- Sugars information
- Health claims

Nutrition facts table

The changes to the nutrition facts table include:

Making the serving size more consistent, so that it’s easier to compare similar foods:

- Increasing the font size of serving size and calories and adding a bold line under the calories
- Adding potassium. The amounts in milligrams (mg) for potassium, calcium and iron will need to be displayed
- Removing vitamins A and C
- Adding a footnote at the bottom of the table about % daily value to help consumers understand how much sugar and other nutrients (like sodium) are in their food and will explain that 5% or less is a little and 15% or more is a lot. This change will help Canadians to better compare two food products (formatting specifics for this area will be “a little”, “a lot”, “peu” and “beaucoup” in bold)
List of ingredients

The changes to the list of ingredients include:

- Grouping sugars-based ingredients in brackets after the name ‘sugars’ to help consumers identify all of the sources of sugars added to a food
- Listing food colours by their individual common names rather than the generic term “colour.
- Making the text in black font on white or neutral background
- Creating minimum type height requirements for ingredients
- Using bullets or commas to separate ingredients
- Using both upper and lower-case letters for the ingredients in the list

The same format rules will apply to any ‘contains’ statement indicating the presence or potential presence of:

- Priority food allergens (a list of food allergens required to be declared in Canada can be found here)
- Gluten sources
- Added sulphites

These changes will make it easier to find, read and understand the list of ingredients.
Serving size

Changes to serving size will better reflect the amount that Canadians eat in one sitting. This is because serving sizes will be based on regulated reference amounts.

Serving sizes will also be more consistent, making it easier to compare similar foods and know how many calories and nutrients are being consumed (the changes are different for single serve and multi-serving packages).

For foods that can be measured, like yogurt, the serving size will be shown as a common household measurement, such as:

- cup
- teaspoon
- tablespoon
Foods that come in pieces or are divided

For foods that come in pieces like crackers, or are divided into pieces before eating like lasagna, the serving size will be shown as either:

- the number of pieces or
- as a fraction of the food

This will be paired with its weight in grams. Similar products will have the same or very similar gram amounts.

For certain foods like sliced bread, the serving size will reflect the way they’re typically eaten, followed by its weight in grams.

For example, the serving size on a bag of bread will show 2 slices of bread and its weight in grams. This reflects that most people eat 2 slices of bread at one time. This will make it easier for you to compare different types of bread.
Foods that come in pieces.

Foods like bread where the serving size will reflect the way they’re typically eaten.
Sugars information

The changes to sugars include those in the nutrition facts table and list of ingredients.

Sugars - Nutrition facts table

A % daily value has been included for total sugars to help compare the sugars content of different foods and identify sugary foods that should be limited, such as those with a sugars daily value of 15% or more.

Sugars - List of ingredients

Formatting changes, include presenting the text of the list of ingredients in black font on a white or neutral background, providing minimum type height requirements for ingredients, using bullets or commas to separate ingredients, and using both upper and lower-case letters for ingredients in the list are all aimed at making the list of ingredients easier to find, read and understand.

The same formatting changes will also apply to any ‘contains’ statement within an ingredient list indicating the presence or potential presence of priority food allergens, gluten sources and added sulphites.

Changes to the list of ingredients include grouping sugars-based ingredients in brackets after the name ‘sugars’ to show all of the sources of sugars added to a food.

Sugars-based ingredients will be grouped in brackets in descending order by weight after the name ‘sugars’.

Sugars can include:

- white sugar, beet sugar, raw sugar or brown sugar
- agave syrup, honey, maple syrup, barley malt extract or fancy molasses
- fructose, glucose, glucose-fructose (also known as high fructose corn syrup), maltose, sucrose or dextrose
- fruit juice concentrates and purée concentrates that are added to replace sugars in foods
Sugars – nutrition facts table.

The following example illustrates that there’s more:

- fancy molasses by weight than brown sugar or sugar
- sugars in the food by weight than any other ingredient

**Sugars – list of ingredients.**

**Original**

**NEW**

<table>
<thead>
<tr>
<th>Ingredients: Wheat flour, Fancy Molasses, Vegetable Oil Shortening (soybean and/or canola and modified palm oil), Brown Sugar, Liquid Whole Egg, Sugar, Salt, Sodium Bicarbonate, Spices, Colour</th>
<th>Ingredients: Sugars (fancy molasses, brown sugar, sugar) • Wheat flour • Vegetable oil shortening (soybean and/or canola and modified palm oil) • Liquid whole egg • Salt • Sodium bicarbonate • Spices • Allura red</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original</td>
<td>NEW</td>
</tr>
<tr>
<td>INGREDIENTS: WHEAT FLOUR, FANCY MOLASSES, VEGETABLE OIL SHORTENING (SOYBEAN AND/OR CANOLA AND MODIFIED PALM OIL), BROWN SUGAR, LIQUID WHOLE EGG, SUGAR, SALT, SODIUM BICARBONATE, SPICES, COLOUR CONTAINS: WHEAT, EGG, SOY</td>
<td>Ingredients: Sugars (fancy molasses, brown sugar, sugar) • Wheat flour • Vegetable oil shortening (soybean and/or canola and modified palm oil) • Liquid whole egg • Salt • Sodium bicarbonate • Spices • Allura red</td>
</tr>
<tr>
<td>Contains: Wheat, Egg, Soy</td>
<td></td>
</tr>
</tbody>
</table>
Health claims

Finally, the amendments allow the claim that fruits and vegetables reduce the risk of heart disease, thereby allowing Canadians to be informed of the health benefits of eating fresh fruits and vegetables. The claim “A healthy diet rich in a variety of vegetables and fruit may help reduce the risk of heart disease” is allowed on fruits and vegetables.

Don’t forget to use the CFIA’s rather useful “labelling checklist” to make sure your label contains all the necessary information. It can be found here.

It pays to get it right

Don’t just translate your content, adapt it to the local market.

It pays to get your labelling right. LAT Multilingual is experienced in bilingual packaging, having helped many clients like McCormick, HAIN Celestial adapt their packaging to ensure they are well positioned within the Quebec market. For example, when HAIN Celestial launched their new Blue Print Juice in Canada with the slogan “We Think. You Drink.”, we needed to come up with an equally well thought out tagline in French so that it resonated with the Quebec market. We came up with “Une boisson mûrement réfléchie”.

It pays to translate your slogans and taglines, but it's important to do it right. The Pepsi slogan, “Come alive with the Pepsi Generation” when translated in Taiwanese, became, “Pepsi will bring your ancestors back from the dead”. Not only a bit creepy by culturally, it was an insult. Avoid these mishaps by trusting the professionals with your content.

Providing French content to a Québécois audience is about more than following the rules; it is a way of reaching out and engaging with a community. Working with a team of in-market professionals who understand the subtleties of Canada’s and Quebec’s legislation will make it a lot easier for your business to reach and engage with Canadians throughout the country.

Contact us here for a quote.