

Canada's Requirements for Food Labels

Canada and the U.S. have a long history of attempting to harmonize food label regulations on both sides of the border. As a result, Canadian regulations are often similar to those of the U.S. Still, it is not possible to create one label that will satisfy both U.S. and Canadian labeling requirements. This is because: each country has different requirements for formatting the Nutrition Facts, the rounding rules are different, the units for reporting nutrients sometimes differ, and the countries have established different Daily Values for some nutrients. Also, the requirements for ingredient/allergen declarations are different, and there are some differences relating to net contents statements, nutrition/health claims and other aspects of the label.

This section of the guide highlights key differences between Canadian and U.S. regulations with respect to placing nutrition and health-related claims on food labels.

Almost all Canadian food labels must be represented in both of Canada's official languages: English and French. There are only a few exceptions such as local foods, test market foods and specialty foods. This bilingual requirement includes claims and other statements about a product's nutritional benefits used in labeling or advertising. The province of Quebec has additional requirements concerning the use of the French language on all products marketed within its jurisdiction.

NUTRIENT CONTENT CLAIMS IN CANADA ...

- ... are statements or expressions which describe (directly or indirectly) the level of a nutrient in a food or a group of foods
- ... are limited to those defined in *Food & Drug Regulations* (FDR)
- ... must meet all conditions and follow prescriptive wording set out in the FDR
- ... are possible only for nutrients that have defined intake standards or recommendations
- ... apply to all foods whether sold to the trade, at retail, at restaurants or to other food service establishments
- ... are always evaluated for validity against the serving size shown in the Nutrition Facts on the label, *and* the reference amount established for the food category in Schedule M of the FDR
- ... are often conditional upon the level of other nutrient(s) in the food. (In the U.S., disclosure statements are required in such instances. In Canada, disclosure statements are not required since claims cannot be made when certain nutrients exceed threshold levels.)
- ... when placed on a food label or advertisement, must show same size and prominence of all words, numbers, signs or symbols that are part of the claim
- ... trigger the requirement for a Nutrition Facts table in products that would be exempt from nutrition labeling if no claims were made
- ... require that the quantitative value for the nutrient that is the subject of the claim appears in the Nutrition Facts table. (If a Nutrition Facts table is not present, as for example in the case of a shelf tag or a food advertisement, then the quantitative declaration must be provided on the label or in the advertisement.)



Highlights for nutrient content claims in Canada, as summarized from *CFIA Guide to Food Labelling & Advertising* (CFIA Guide):

- Claims are permitted for trans fatty acids, omega-3 and omega-6 polyunsaturated fatty acids.
- *Free* claims are based on amounts of nutrients that are nutritionally-insignificant or trivial in relation to current dietary recommendations.
- Criteria for saturated fatty acid claims are linked to the trans fatty acid content of the food. Likewise, criteria for cholesterol claims are also linked to saturated and trans fatty acid content.
- The claim *X% fat free* is permitted on foods that meet the criteria for *low fat*, as long as the low fat statement accompanies the claim.
- Modifiers such as *ultra* or *extra* cannot be used with claims such as *low fat* or *high fibre* to make them appear to be lower than low or higher than high.
- The nutrient content claim *light* can only be used for foods that are *reduced in fat* or *reduced in energy*.
- The claim *lightly salted* is also permitted.
- The word *light* may be used in reference to a sensory characteristic. In this case, the name of the sensory characteristic being described must accompany the word light (e.g., *light tasting* or *light colour*).
- There are limits on nutrient content claims for foods intended for children under the age of two.
- Protein claims are seldom used in Canada. This is because only 47 items currently have Health Canada-approved Protein Efficiency Ratios (PER), and without an approved value the PER must be established through specific rat feeding studies.
- For claims made about vitamins and minerals: If a vitamin or mineral is not on the allowed list of fortificants for the product category and is added for functional purposes, then the nutrient content claim must be based only on the amount naturally present in the ingredients.
- The use of the words *diet* or *dietetic* is restricted to “foods for special dietary use” (as defined by Division 24 of the FDR) that qualify as *free of calories*, *low in calories*, *reduced in calories* or *free of sugars*, and are labelled as such.
- *Healthy* is not allowed as a nutrient content claim. (In Canada, use of the word healthy on food labels can only be used when it is used in the wording of an approved health claim.)
- The claims *calorie-reduced*, *low calorie*, *free of sugars* and *low in sodium* or *low in salt* are no longer restricted to foods for special dietary use.*
- Claims such as *low carbohydrate*, *source of complex carbohydrates*, *source of polyunsaturates* and *source of monounsaturates* are no longer permitted on foods.*

* promotes harmonization with U.S. food label regulations

Comparative nutrient content claims use words such as *lower*, *reduced*, *higher*, *more* and *light* to compare the nutrient values of one product to another. Comparative nutrient content claims must:

- Involve similar foods, or foods of the same food group depending on the type of claim.
- Be based on differences that are both nutritionally-significant and analytically-significant.
- Clearly identify the foods being compared and the differences between them.
- Be labelled so that the information required to accompany the claim is placed immediately adjacent to the most prominent claim on the principal display panel of the food package (PDP), with letters of the same size and prominence as the claim. If the claim is not on the PDP, then the required accompanying information must be grouped with the most prominent claim elsewhere on the label or advertisement with letters of the same size and prominence as the claim.



Quick Comparison of Commonly-Used Nutrient Content Claims Canadian vs. U.S. Qualifying Criteria

Claim Category	Nutrient Content Claim	Canadian Qualifying Criteria	U.S. Qualifying Criteria
Fat-Related	Free of Fat	Less than 0.5g fat per serving	Less than 0.5g fat per serving, and includes no ingredients that contain fat*
	Low in Fat	3g or less fat per serving	3g or less fat per serving
	Free of Saturated Fat	Less than 0.2g saturated fat and less than 0.2g trans fat per serving	Less than 0.5g saturated fat and less than 0.5g trans fat per serving, and includes no ingredients that contain saturated fat*
	Low in Saturated Fat	2g or less of the sum of saturated + trans fats per serving, and not more than 15% of calories from the sum of saturated + trans fats	1g or less saturated fat per serving, and not more than 15% of calories from saturated fat
	Free of Trans Fat	Less than 0.2g trans fat per serving, and meets criteria for "Low in Saturated Fat"	Not permitted in U.S.
Cholesterol-Related	Free of Cholesterol	Less than 2mg cholesterol per serving, and meets criteria for "Low in Saturated Fat"	Less than 2mg cholesterol and 2g or less saturated fat per serving, and includes no ingredients that contain cholesterol*
	Low in Cholesterol	20mg or less cholesterol per serving, and meets criteria for "Low in Saturated Fat"	20mg or less cholesterol and 2g or less saturated fat per serving
Sodium- or Salt-Related	Free of Sodium	Less than 5mg sodium per serving	Less than 5mg sodium per serving, and does not contain salt or other sodium-containing ingredients*
	Very Low in Sodium	Not permitted in Canada	35mg or less sodium per serving
	Low in Sodium	140mg or less sodium per serving	140mg or less sodium per serving
Fibre-Related	Source of Fibre	2g or more fibre per serving	Not permitted in U.S.
	High Source of Fibre (Good Source of Fiber in U.S.)	4g or more fibre per serving	2.5-4.9g fiber per serving
	Very High Source of Fibre (Excellent Source of Fiber in U.S.)	6g or more fibre per serving	5g or more fiber per serving
Vitamins and Minerals	Source of [Vitamin/Mineral]	At least 5% of RDI per serving	Not permitted in U.S.
	Good Source of [Vitamin/Mineral]	At least 15% of RDI per serving (at least 30% of RDI for vitamin C)	10-19% DV per serving
	Excellent Source of [Vitamin/Mineral]	At least 25% of RDI per serving (at least 50% of RDI for vitamin C)	At least 20% DV per serving



"Per serving" means per reference amount and per labelled serving. However, if a product has a small serving size (i.e., reference amount of 30g or 30mL or less in Canada – or 30g or 2 Tbsp or less in U.S.), then the nutrient levels for the claim must be met on a 50 gram basis. Also, there are different criteria for "main dishes" and "meals" (for U.S.) and "prepackaged meals" (for Canada).

**Exceptions are allowed if the relevant ingredient is asterisked in the ingredient statement and footnoted as required.*



QUANTITATIVE DECLARATIONS OUTSIDE NUTRITION FACTS ...

- ... can be used both for nutrients and food constituents required or permitted within the Nutrition Facts table, as well as for those not permitted inside the Nutrition Facts table (e.g., named amino or fatty acids)
- ... are not limited to nutrients that have defined standards or recommendations (this is in contrast to nutrient content claims)
- ... may include a % Daily Value for nutrients that have an established Daily Value
- ... may not include glycemic index or glycemic load values (glycemic claims are not allowed in Canada)
- ... when placed on a food label or advertisement, must show same size and prominence of all words, numbers, signs or symbols that are part of the claim
- ... must be declared on an unrounded basis
- ... must include the serving size in the quantitative declaration
- ... must use established units for declaration; specifically:
 - Energy in Calories
 - Vitamins and Minerals (except Sodium and Potassium) in milligrams (mg), micrograms (µg), retinol equivalents (RE) or niacin equivalents (NE) as applicable and defined through the FDR
 - Sodium, Potassium and Cholesterol in milligrams (mg)
 - Mineral ion content of pre-packaged water or ice in parts per million (ppm)
 - All other nutrients in grams (g)



EXAMPLES AND EXPLANATIONS:

ALLOWED: 0 g carbohydrates per 250 ml serving (factual statement with no nutrient content claims)

NOT ALLOWED: Contains 0 g carbohydrates per 250 ml serving (*contains* is a quantifying word that is not permitted with this statement)

ALLOWED: 21 mg cholesterol per 30 g serving (uses unrounded data, as required)

NOT ALLOWED: 20 mg cholesterol per 30 g serving (uses rounded data from the Nutrition Facts table, which is not allowed)

ALLOWED: 0.2 g taurine per 250 ml serving (units are expressed in grams, as required)

NOT ALLOWED: 215 mg taurine per 250 ml serving (units are expressed in milligrams, which is not allowed for amino acids)