

INGREDIENT LABELING

Key Differences in U.S. & Canada

| | Ingredient | U.S. | Canada |
|----|-----------------------|---|--|
| 1 | Enriched Flour | must include sub-ingredients: e.g., enriched flour (wheat flour, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid) | does not require ingredient sub-listing NOTE: The white flour used in all food products sold in Canada must be enriched. |
| 2 | Baking Powder | must include sub-ingredients: e.g., baking powder (sodium bicarbonate, sodium aluminum sulfate, cornstarch) | does not require ingredient sub-listing |
| 3 | Margarine | must include sub-ingredients: e.g., margarine (liquid soybean oil, partially hydrogenated soybean oil, water, whey, salt, mono & diglycerides, soy lecithin, potassium sorbate-preserved, sodium benzoate-preserved, artificial flavor, phosphoric acid, vitamin A palmitate, beta-carotene color) | does not require ingredient sub-listing NOTE: Some U.S. foods contain an ingredient identified as "margarine" (with the parenthetical included), but the "margarine" does not meet Canadian standards. Without a formulation change the parenthetical statement must be present and the word "margarine" cannot be used. |
| 4 | Shortening | must include sub-ingredients: e.g., vegetable shortening (partially hydrogenated soybean and cottonseed oils) | does not require ingredient sub-listing NOTE: Some U.S. foods contain an ingredient identified as "shortening" (with the parenthetical included), but the "shortening" does not meet Canadian standards. Without a formulation change the parenthetical statement must be present and the word "shortening" cannot be used. |
| 5 | Spices | may collectively be declared as "spices" without identifying the specific spice if the ingredient is contained in the listing for spices found in 21CFR101.22 NOTE: There are differences in FDA & USDA regulations. For example, FDA does not permit garlic powder and onion powder to be declared as "spices" while USDA does. | may collectively be declared as "spices" without identifying the specific spice if the ingredient is contained in the listing for spices found in the FDR Table following B.01.009 (2) |
| 6 | FD&C certified colors | must be declared by color and number: i.e., Red 3, Red 40, Yellow 5, Yellow 6, Blue 1, Blue 2 | may collectively be declared as "colours", but if specifically named, must be declared by common name: i.e., Erythrosine, Allura Red, Tartrazine, Sunset Yellow FCD, Brilliant Blue FCF, Indigotine |
| 7 | Other added colors | ingredients used as colors may collectively be declared as "artificial colors" or "colors" OR by common or usual name, except that carmine or cochineal must be specifically listed NOTE: Added colors (from any source) are not considered "natural" in U.S. | may collectively be declared as "colours" (no differentiation from FD&C certified colours) NOTE: If the colour is from a natural source (e.g., beet powder), it may be labeled as a "natural colour" in Canada. |
| 8 | Flavors | may collectively be declared as "natural flavor" or "artificial flavor" without listing the specific flavor or its components NOTE: In both the U.S. and Canada, if an allergen is present, it must be called out in brackets behind the flavor ingredient OR in a separate Contains allergen statement. | may collectively be declared as "natural flavour" or "artificial flavour" without listing the specific flavour or its components NOTE: Neither Canada nor U.S. recognize nature-identical flavors used in Europe. Those flavors are labeled as artificial flavors. |
| 9 | Preservatives | function must be declared: e.g., sodium benzoate (preservative) | function not required |
| 10 | Ingredients < X% | U.S. regulations include a provision for listing minor ingredients (those present at 2% or lower) in any order at the end of the ingredient statement with the phrase "Contains X% or less of the following:" | Canadian regulations specify that ONLY specific classes of ingredients can be shown at the end of the ingredient statement in any order. Details at www.foodlabels.com/reader-qa |

Note: If you need help with ingredient statements or allergen statements, contract with Food Consulting Company to prepare or review your Ingredient Statements and Allergen Compliance with our [Ingredient Statement](#) service or receive ready help for all food labeling questions by purchasing [Retained Regulatory Support](#). As always, we will answer client questions related to work completed within the past 90 days without additional charge. See [services](#).

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