



## MORE TO FOOD LABELLING THAN MEETS THE EYE

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There are numerous food labelling requirements whose primary purpose is to provide consumers with product information, thus enabling them to make informed choices about the foods they consume. Insofar as food labels are one of the most important and direct means of communicating product information, both food manufacturers and distributors in Canada must strictly adhere to these requirements.

Pre-packaged food product labels overflow with information, much of which is required by the multiple applicable laws and regulations, as per the following illustrative list:

- the common name of a food (note that it may be prescribed by regulation, for example, "orange juice from concentrate");
- the declaration of net quantity (volume, weight or count);
- the name and address of the manufacturer or distributor (for prepackaged products wholly manufactured outside of Canada on which the label carries the name and address of a Canadian supplier, the words "imported by/importé par" or "imported for/ importé pour" must precede the name and address, unless the geographic origin of the product is placed next to the name and address of the Canadian supplier);
- the list of ingredients (ingredients (and their constituents) must generally be referred to by their common names, and must be listed in descending order by weight, as determined before they are combined to make the food);
- nutrition facts table (in order to provide information on the amount of energy (calories) and the relative amount of at least thirteen nutrients (proteins, lipids, carbohydrates, vitamins and minerals) based on a serving of stated size (ex. 100 g for yogurt)).

Depending on the nature of the product in question, other types of information may be required, such as is the case for alcoholic beverages, fruits and vegetables, and processed meat, poultry and fish.

In addition to these essential requirements, not to mention those relating to bilingualism, food product manufacturers and distributors should be particularly

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cautious of certain types of claims, including those concerning the composition, quality, quantity, origin and the nutritional value of a product (e.g. "home made", "natural", "100% pure," "product of Canada", "light", "low fat"), even if such claims are a component of a trade-mark. For example, the claim "natural" in a trade-mark for foods that contain preservatives or additives may be questionable.

In light of the organic products trend, it is also important to bear in mind that in accordance with the Organic Product Regulations, products stemming from interprovincial trade or products imported from abroad, must meet certain standards in order to qualify as "organic" and in order for the "Canada Organic" logo to be affixed to these products. In addition, provincial requirements may also apply.

These brief remarks represent the tip of the iceberg when dealing with food product labelling requirements in Canada. To ensure that your labelling practices or those of your clients respect applicable Canadian legislation, we invite you to contact one of the professionals from our team.



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