Question Report
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Is this differrent requirements than nft for kids under 3? under 1?

The NFT format stays the same. When a food is targeted to a certain age group, then the recommended daily values need to be considered. The table of daily values, is a two-part table that sets out the reference values or recommended amounts of nutrients (the daily value) for specific age groups. These are the reference points upon which the % daily value in the nutrition facts table are based.

Part 1 of the table sets out the daily values for macronutrients and sodium for two age groups.

Part 2 of the table sets out the daily values for vitamin and mineral nutrients for three different age groups.

Also the landing page for Nutrition labelling - Table of reference amounts for food (Part W): https://www.canada.ca/en/health-canada/services/technical-documents-labelling-requirements/nutrition-labelling-table-reference-amounts-food.html#w is a great reference for foods that are intended solely for children under four years of age.

Q about NFT. If imported products from Asia does not have a compliant Canadian NFT, is this product technically in non-compliance? Will the importer be penalized in this situation? or be given a warning to remove the product from retail service and fix the NFT label to be compliant?

Yes, the non-complaint food can be imported under section 18 of the SFCR. The folowing expression “For Further Preparation Only” or “pour conditionnement ultérieur seulement” must be applied or attached to the food or accompany the food during importation.
The licence holder needs to add labelling (domestic preparation) to their licence if they want to apply the label themselves and bring the product into compliance before sale. This does not apply to meat products.

if we are making an item that will be exported to the US, do we need to change parts of the labelling?

You will need to meet the requirements of the US and therefore need to contact them about their labelling requirements on specific products. There are differences in Canadian and US labelling.

Is the energy related statement is mandatory for all type of foods? Dairy products? or is it just for the products that contain high sodium, fat or sugar?

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Front-of-package (FOP) nutrition symbol
Most prepackaged foods sold in Canada are required to be labelled with a nutrition symbol when the amount of saturated fat, sugars and/or sodium is equal to or higher than the specified nutrient thresholds [B.01.350, FDR]. The following dairy products are always exempt from the FOP nutrition symbol requirements [B.01.350(5)(f), FDR]:

whole, partly skimmed and skimmed cow or goat's milk sold in refillable glass containers
flavoured whole, partly skimmed and skimmed cow's milk sold in refillable containers
cream sold in refillable glass containers
Specific dairy products are conditionally exempt from the nutrition symbol requirements. Milk from any animal, in liquid or powdered form, is conditionally exempt from the nutrition symbol requirements for all 3 nutrients of concern [B.01.350(6), FDR]. Examples include cow, sheep and goat milk.

The following dairy products are also conditionally exempt from the nutrition symbol requirements for saturated fat and sugars [B.01.350(9) FDR]:

cheese that is made from dairy products, whether standardized or unstandardized
yogurt, including drinkable yogurt, that is made from dairy products
kefir
buttermilk

See Foods exempt from the front-of-package (FOP) nutrition symbol requirements for details on the exemptions and reasons for loss of exemption: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5

If you were asking about the energy values (calories) on the NFT, then they would need to be declared, anytime an NFT is required on the product.

Joined a bit late so not sure if it was mentioned, would this slide presentation be made available after now for continuous reference?

Yes, the recording will be made available to participants.

If we have a multipack product, can we use just one FOP symbol that covers all the individual products inside even if the products would have different FOP symbols?
Example: using a FOP symbol for high in fat and sodium when one product is high in fat but not sodium and the other is high in sodium but not fat.

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference. Section 7 of the guide covers front-of-package (FOP) nutrition labelling of prepackaged products that contain assortments of foods, and prepackaged products that contain either ingredients that are intended to be combined together or foods that are intended to be consumed together. This section will also provide details on FOP that ae unacceptable.

Will a sticker with the new FOP labelling requirements put on the FOP be satisfactory if it is a correct size?

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See section 6.2 of the guide. There are requirements related to the symbol's visibility, language, orientation and graphic specifications. The nutrition symbol must be displayed in accordance with the applicable symbol set out in Schedule K.1, FDR. Regulated parties are encouraged to display the nutrition symbol in the applicable part of the PDP in such a manner that it will remain intact when the package is opened.

The nutrition symbol can be printed directly on a label or applied to it as a sticker. In the latter case, the sticker must be able to withstand any of the normal conditions that the product may be exposed to until such time the product reaches the consumer.

If you import products from the US, will the FOP sticker need to be put on them? Even if they are single serve products

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Section 5 of the guide covers the exemption from the FOP. For some products, the conditional exemption is based on their conditional exemption from the NFt requirement and for other products it is nutrient-specific based on their ingredients.

Losing a conditional exemption does not necessarily mean a product will display the nutrition symbol. The symbol is required on the label only if the content of one or more of these nutrients meets or exceeds the threshold.

Yes, if the product meets the requirements for the FOP labelling (is not exempt), it will have to be applied.

Is FOP exempt for local markets like other labelling parts? Or is it independent of that?

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

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Losing a conditional exemption does not necessarily mean a product will display the nutrition symbol. The symbol is required on the label only if the content of one or more of these nutrients meets or exceeds the threshold.

According to the Food and Drug Regulations (FDR), foods usually exempt from carrying a NFt if sold only at a road-side stand, craft show, flea market, fair, farmers' market or sugar bush by the individual who prepared and processed the product [B.01.401(2)(b)(vi), FDR]

These products are exempt as they are typically produced by very small enterprises. The exemption does not extend to foods produced by enterprises other than the vendor, such as by medium and large-sized companies when they sell their products at these venues.

To ensure we as a company are being compliant with the new changes…Can CFIA approve labels before using it on actual product?

No, CFIA does not have labelling consultants and can usually only help with finding the requirements and does not approve labels. Industry will need to find resources to help with labelling consultations.

If we sell a product that ships in October, but is still on a retailers shelf in January 2025 is this considered an issue or is it ok? As manufacturers we do not have control over how fast items sell through.

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Section 2 of the guide covers this question. Regulated parties must comply with the requirements for all components of these amendments as of January 1, 2026. As of January 1, 2026, information presented in accordance with the former requirements will no longer be compliant. However, products imported, manufactured in Canada or packaged at retail before January 1, 2026 can remain in the warehouse and continue to be sold on store shelves.

This is where it would be important to have your traceability documents available to show when the products were manufactured, imported, purchased or packaged at retail.

Will the importer be penalized in this situation? or be given a warning to remove the product from retail service and fix the NFT label to be compliant?

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I believe this question on the NFt was answered above for the client.

"Principal place of Business".
Please clarify in the case of using a co-packer.
for example Compliments only puts "Prepared For Sobeys, Misissauga ON L4W 0C7" and not the name and address of who it was prepared *BY*. Is this also correct for smaller companies using a co-packer?

All prepackaged foods that require a label must declare the name and principal place of business of the person who has manufactured, prepared, produced, stored, packaged or labelled the food, or of the person for whom the food has been manufactured, prepared, produced, stored, packaged or labelled [218(1)(b), Safe Food for Canadians Regulations (SFCR); B.01.007(1.1)(a), Food and Drug Regulations (FDR)]. For additional details, refer to Food products that require a label.

Additional information that may be included on a label
Information such as websites and 1-800 telephone numbers may be provided in addition to a company's name and principal place of business.

Additional terms, such as "prepared for", "packaged for", or "distributed by", that provide further information about the name and principal place of business may be voluntarily added on the label of prepackaged products. In general, this is not mandatory.

The principle place of business is the company that would take legal ownership of the product in the case of a complaint/recall. If a small company uses a co-packer, they can definitely use "prepared for" if they want to be the contact for any issues.

***January 2026 after the new labelling regulations.**

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

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This is where it would be important to have your traceability documents available to show when the products were manufactured, imported, purchased or packaged at retail.

Under what circumstances do we need an NPN for products like spices, tea and coffee?

I am assuming the person is asking about Natural Product Numbers (NPN) for this information, please consult with Health Canada, as NPNs are under theitr jurisdiction. A Natural health product (or NHP) is a term used in Canada to refer to a group of health products including: vitamin and mineral supplements, herbal remedies and other plant-based health products, traditional medicines (such as traditional Chinese medicines and Ayurvedic [East Indian] medicines), homeopathic medicines, fatty acids (such as omega 3, 6 and 9), probiotics and some personal care products such as antiperspirants, medicated shampoos and mouthwashes.

Generally if you look in the Food and Drug regulations and there is a standard for different teas and you start adding ingredinets outside of the standard and they could be medicinal, then you may need to consult Health Canada for a Natural Health Product review.

Thank you for the heads up about the labelling license requirement :)

You're welcome!

What if we purchase products from suppliers (and we are not the canadian importer), whose responsibility is it for the labelling requirements?

As prepackaged products may differ in the way they are displayed at the time of sale, manufacturers and importers share joint responsibility with retailers to ensure that all information is displayed on the appropriate surface at the time of sale.

olives are cured, so by definitation they need to label high in sodium?

Prepackaged foods with a small reference amount (≤ 30 g or mL) that meet or exceed 10% DV of saturated fat, sugars or sodium:
Because these foods are typically consumed in smaller amounts and can be concentrated sources of these nutrients, they have a lower threshold.
Such foods could include pickles, salad dressing, cookies or breakfast cereals. The caluculation would need to be based on the food and the sodium content of the food.

Has industry making these changes proven to actually be effective in reducing obesity and health risks anywhere else in the world?

This could be directed at Health Canada, as they consult industry and respond to any enquiries related to the new requirements and their intent.

If you have single serve items, can you have a sign on the shelf for the item, instead of labelling each item?

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Section 5 of the guide covers the exemption from the FOP. For some products, the conditional exemption is based on their conditional exemption from the NFt requirement and for other products it is nutrient-specific based on their ingredients.

Losing a conditional exemption does not necessarily mean a product will display the nutrition symbol. The symbol is required on the label only if the content of one or more of these nutrients meets or exceeds the threshold.

It is best to determine, if you need the NFt and FOP labelling first or if you are exempt and then you would not need to have the label.

what is considered high in sugar,fats and sodium?

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Section 4 of the guide covers how to determine the threshholds for the nutrient contents. The Food and Drug Regulations (FDR) require that a nutrition symbol appear on the label (specifically, on the principal display panel (PDP)) of a prepackaged product when the amount of saturated fat, sugars and/or sodium is equal to or higher than the specified nutrient thresholds. The regulations specify the thresholds and the approach for determining whether the amount of one or more of these nutrients meets or exceeds them.

Reference: subsections B.01.350(1) to (4), FDR

The thresholds for the FOP nutrition symbol (the symbol) are based on Daily Values (DVs). For some nutrients, such as fibre, potassium and calcium, the DV is the recommended amount that people in a specific age group should try to consume each day. For other nutrients, such as saturated fat, sugars and sodium, the DV is the amount that people should try not to exceed. The thresholds for the symbol are expressed as percentages of the DV (% DV).

The DVs are found in the Table of Daily Values, which is incorporated by reference into the FDR and available on the Government of Canada website.

is it ok not to have NFT on our food service packages?

Foods requiring a Nutrition Facts table
The Food and Drug Regulations (FDR) state that the Nutrition Facts table (NFt) is mandatory for most prepackaged foods and is required to be presented in a certain manner when it appears on a food label [B.01.001, B.01.401(1), FDR]. The Presentation of the Nutrition Facts table section outlines these requirements.

Certain foods or types of foods hold either exemptions or prohibitions from displaying an NFt. The NFt may be voluntarily provided for foods that have an exemption; however, when it does appear, the information must be provided in accordance with the FDR.

Please also visit the Industry Labelling Tool under Nutrition Labelling, as there are considerations for different presentation of nutrition info for Foods used in the manufacture of other foods and for foods for use in commercial enterprise or institution. FDR B.01.404 and B.01.405

FOP labelling is required by Jan 1 2026, what about product sold prior to Jan 1st and remaining on the shelf in the market place that has no FOP

The landing page for Front-of-package nutrition symbol labelling guide for industry: https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

Section 2 of the guide covers this question. Regulated parties must comply with the requirements for all components of these amendments as of January 1, 2026. As of January 1, 2026, information presented in accordance with the former requirements will no longer be compliant. However, products imported, manufactured in Canada or packaged at retail before January 1, 2026 can remain in the warehouse and continue to be sold on store shelves.

This is where it would be important to have your traceability documents available to show when the products were manufactured, imported, purchased or packaged at retail.

Is the January 1, 2026 FOP labelling requirement based on the date the product was manufactured (and packaged) or the date the product was sold?

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guidelines/guidance-documents/front-package-nutrition-symbol-labelling-industry.html#a5 is a great reference.

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This is where it would be important to have your traceability documents available to show when the products were manufactured, imported, purchased or packaged at retail.

If the product is sold to business such as restaurtants, where the end consumer might not see these labels, would FOP symbols still required to the packaging?

Nutrition labelling for “food for use in manufacturing other foods” and “foods for commercial or industrial enterprise or institution”:

Please note that different requirements apply to Nutrition labelling for “food for use in manufacturing other foods” and “foods for commercial or industrial enterprise or institution” (they are set out in section B.01.404 and section B.01.405 of the FDR respectively).

Basically, the nutrition information on prepackaged foods intended for use in the manufacture of other foods does not have to appear in a NFt format, but must include the same nutrients as a NFt. However, nutrient values are required to be declared per gram or 100 g for a product such as crab whose net quantity is expressed by weight and they must be stated with a degree of precision corresponding to the accuracy of the analytical methodology used to produce them. Furthermore, they do not have to be expressed in percentages of daily values and the units in which vitamins and minerals must be expressed may differ from the ones required in a NFt (see Annex 1: Vitamin and mineral declarations for the mandatory units to use).

As for nutrition information for ready-to-serve multiple-serving prepackaged foods intended solely to be served in a commercial or industrial enterprise or an institution (e.g. a restaurant), it does not have to be displayed in a NFt format either, but the nutrients that must be presented and the manner in which they must be declared are the same as for consumer prepackaged products [i.e. nutrients must include serving size declaration (household measure and metric measure) and units of measure, rounding and daily values for consumer foods are used].

Please note, there is some flexibility in the manner in which nutrition information is provided for a shipment of both types of shipping containers mentioned above. As per subsections B.01.404 (2) and B.01.405 (2) of the FDR, written nutrition information must accompany each delivery of a prepackaged product (i.e. it may be provided on a specification sheet, a bill, label etc.). In other words, the nutrition information is not required to be provided on the label for the food in this case.

Front-of-package (FOP) nutrition symbol labelling: Shipping containers are always exempt from the FOP nutrition symbol labelling requirements, if the container and its contents are not sold as a single unit prepackaged product to a consumer at retail [B.01.350(5)(a), FDR].

The following are not required to be labelled with an FOP nutrition symbol:

shipping containers destined for retailers whether the products inside are fully labelled consumer prepackaged or in bulk
shipping container destined for a restaurant or a commercial institution
shipping container destined to another establishment for further processing
When a shipping container and its contents are sold as a one unit prepackaged product to a consumer at retail, the shipping container is subject to the FOP nutrition symbol requirements. For more information, refer to Foods exempt from the front-of-package (FOP) nutrition symbol requirements.

A lot of products bought in small stores actually have two NFTs, didn't know that was not allowed.

The Food and Drug Regulations set out the manner in which energy and nutrient values must be declared, as well as the presentation and requirements for nutrient content claims and health claims. Subsection 5(2) of the Food and Drugs Act prohibits labelling that is contrary to the Regulations. Since the nutrition information requirements of other countries do not match the Canadian requirements, labels and advertisements with nutrition information other than that permitted by the Food and Drug Regulations are considered to be labelled or advertised contrary to Canadian legislation.

For the single serve item, it would be like a single ice cream sandwich

If your single serve ice cream cups are prepackaged before being offered for sale (not clerk served upon request), then a label will be required. You can verify the mandatory labelling requirements by reviewing the “Core labelling requirements” of the CFIA’s ILT, and the “Labelling requirements for dairy products” section.

The ILT also provides a self-assessment tool (i.e. Food Labelling Requirements Checklist) to assist industry in complying with federal food labelling requirements. This tool will help you develop and evaluate your labels before they are put on the market.

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The following are not required to be labelled with an FOP nutrition symbol:

shipping containers destined for retailers whether the products inside are fully labelled consumer prepackaged or in bulk
shipping container destined for a restaurant or a commercial institution
shipping container destined to another establishment for further processing
When a shipping container and its contents are sold as a one unit prepackaged product to a consumer at retail, the shipping container is subject to the FOP nutrition symbol requirements. For more information, refer to Foods exempt from the front-of-package (FOP) nutrition symbol requirements.

Do we need to put best before date for example jerky has more than 90 days of shelf life?

Products with a shelf life greater than 90 days
Foods with an anticipated shelf life greater than 90 days are not required to be labelled with a best before date or storage information, as they are generally considered to be shelf stable. Examples include most canned foods, many dry foods such as pasta and foods that are sold in a frozen state. However, some manufacturers and retailers choose to provide customers with this information voluntarily.

However you need to consider traceability of your food and therefore please reference subsections 92(1) and (2): Labelling information that must be provided with the food
- If the traceability requirements apply to you, you make sure that a label is applied, attached, or accompanies the food when you provide it to another person. The label must include the following information:
----the common name
----the name and principal place of business of the person by or for whom the food was manufactured, prepared, produced, stored, packaged or labelled
----the lot code if it is a consumer prepackaged food.

Note:

At retail, if you package food into consumer prepackages, the label may include either a lot code or unique identifier.
For food, other than consumer prepackaged food, the label may include either a lot code or unique identifier.

If the package size is too small for an NFT do you still have to put the FOP label on the package?

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Section 5 of the guide covers the exemption from the FOP. For some products, the conditional exemption is based on their conditional exemption from the NFt requirement and for other products it is nutrient-specific based on their ingredients.

Losing a conditional exemption does not necessarily mean a product will display the nutrition symbol. The symbol is required on the label only if the content of one or more of these nutrients meets or exceeds the threshold.

According to the Food and Drug Regulations (FDR), conditional exemption associated with the NFt includes: Products sold only in the retail establishment where they are packaged, if they are labelled with a sticker and have an available display surface < 200 cm2, Products that have an available display surface < 100 cm2. [B.01.0350 (13), FDR]

These products are exempt as they are typically produced by very small enterprises. The exemption does not extend to foods produced by enterprises other than the vendor, such as by medium and large-sized companies when they sell their products at these venues.

The full exemption from the FOP pertains to products with an available display surface < (less than) 15 cm2.

Can you confirm if 100% Fruit juices are exempted from the FOP?

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Section 5.3.2.1 advises that Juices are not considered foods with health protection benefits:

Whole or cut fresh, frozen, canned or dried fruits or vegetables
Examples of eligible products: chopped, diced, grated, riced and shredded forms of fruits and vegetables
Examples of products not eligible: juices, purées, pastes and powdered forms of fruits and vegetables and all forms of coconut

Is ground beef and burgers (raw) exempt from Front of the package labels stating high levels of fat or sodium?

The following prepackaged products are conditionally exempt from the symbol requirements when they are also conditionally exempt from carrying an NFt:

Raw single ingredient meat, meat by-products, poultry meat or poultry meat by-products that are not ground.
Raw single ingredient meat, meat by-products, poultry meat or poultry meat by-products that are ground are always required to carry the NFt, however, they are conditionally exempt from the FOP requirement.
---- Ground meat, meat by-products, poultry meat or poultry meat by-products lose their exemption from the FOP requirement if any of the triggers listed in paragraphs B.01.401(3)(a), (b) or (e) are present. For more information, refer to Foods usually exempt from carrying a Nutrition Facts table on the Canadian Food Inspection Agency's (CFIA) Industry Labelling tool.