



Discover the World

May 14, 2007

All Trade Associations

Dear Sir/Madam,

**Re: Notice on Nutritional Labelling and Allergens**

In keeping with our commitment to provide you with current information to federal regulatory changes, we would like to draw your attention to two issues affecting labelling this year.

**Nutritional Labelling**

The regulations for nutritional labelling have been in force in Canada now for three years. This December the extension for compliance ends and all food products will require a Canadian nutrition facts table. Although beverage alcohol products usually are exempt from this requirement, there are several situations in which suppliers must supply nutrition facts tables:

1. The product package contains a food or non-alcoholic beverage. This situation arises with gift packs containing items such as mixes, olives, vinegar, chocolate, jams, rimmers, etc.
2. A beverage alcohol product makes a “nutritional claim”. Any reference to calorie content or a low level of sugar, carbohydrates, etc constitutes a nutritional claim.
3. A reference to “energy”. This is equivalent to a nutritional claim.
4. An artificial sweetener as one of the ingredients. Artificial sweeteners also trigger several other requirements.
5. Addition of vitamin or mineral nutrients. Note that it is acceptable to have ascorbic acid in an ingredient list without a nutrition facts table, but if it is listed as Vitamin C, a nutrition facts table is required.

More information on nutritional labelling can be found at:

<http://www.inspection.gc.ca/english/fssa/labeti/guide/toce.shtml>.

**Allergen Labelling**

Although legislation on allergen labelling has not yet been tabled in parliament, the CFIA recently has reiterated its policy on ingredient labelling and allergens. The following points were made:

1. Ingredient lists must be complete, including allergenic components.
2. Products must meet the standard of identity that they claim. For example, a product labelled as “wine” must meet the standard of identity for wine in the Canadian Food and Drug Regulations.

3. Precautionary labelling (such as “may contain”) is recommended when a food may inadvertently contain an allergen. When the allergen is likely present the allergen should be accurately declared on the label. For example, a wine label should say “contains sulphites”, not “may contain sulphites”.
4. Allergen statements are recommended but not yet required for standardized products without ingredient lists.

More information on allergen labelling can be found at:

<http://www.inspection.gc.ca/english/fssa/invenq/inform/20070323e.shtml>

Sincerely,

A handwritten signature in black ink, appearing to read 'George Soleas', with a stylized flourish at the end.

George Soleas, M. Sc., Ph.D., MCIC  
Vice President, Quality Assurance