

Front-of-Package Nutrition Symbol Labelling Regulations in Canada

Highlights for Beef Products Sold in Canada



September 2023

PURPOSE & CONTENT

PURPOSE

- To provide a high-level overview of the new Front-of-Package (FOP) Nutrition Symbol Labelling Regulations in Canada.
- To highlight key FOP Symbol considerations for beef products sold in Canada.

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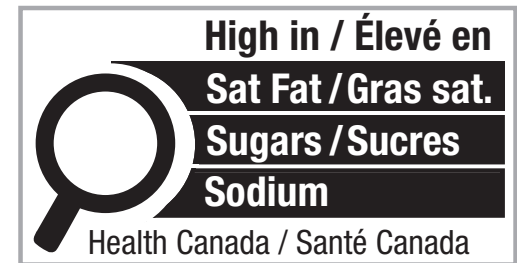
- New Mandate: FOP Nutrition Symbol Labelling
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Disclaimer

- This document is intended for education and guidance on the new FOP Nutrition Symbol Labelling regulations.
- It is important to consult the government of Canada official documents for detailed information on the FOP Labelling regulations.
 - [Regulations Amending the Food and Drug Act Food Symbols](#)
 - [Food and Drug Regulations \(FDR\)](#)
 - [Front-of-Package Nutrition Symbol Labelling Guide for Industry \(Version 2\), May 2023](#)
- The words “prepackaged product”, “product” and “food” are used interchangeably throughout.
- The images in this PPT are not to scale and are for illustrative purposes only.
- The examples presented are hypothetical in nature.

New Regulations: Front-of-Package Nutrition Symbol

- On July 20, 2022, Health Canada published regulations that amend the Food and Drug Regulations (FDR). These new regulations are published in Canada Gazette, Part II, Volume 156, Number 15.
- The new regulations mandate front-of-package (FOP) nutrition symbol labelling for most prepackaged products that contain nutrients of public health concern (saturated fat, sugars and/or sodium) at or above specified thresholds.
- Unless exempt, food products that meet or exceed the thresholds for saturated fat, sugars or sodium will be required to carry the new FOP symbol.
- The symbol has a mandated format and must be presented on the Principal Display Panel (PDP).
- The regulations apply to most prepackaged foods sold at retail in Canada, including those manufactured in Canada or imported for sale.
- Regulations provide exemptions (full or conditional) for certain foods.

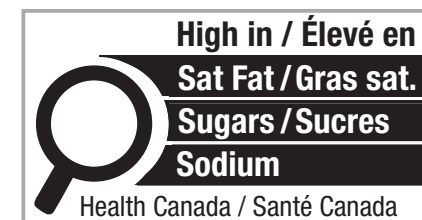


Timelines & Enforcement

- The FOP symbol labelling regulations came into force July 20, 2022.
- Regulated parties must comply as of January 1, 2026.
 - As of January 1, 2026, most prepackaged food products being manufactured or imported, and foods prepacked in-store and sold by retailers must comply with the new FOP labelling requirements.
 - That means if a product requires a nutrition symbol and is manufactured in Canada on or after January 1, 2026, the label must carry the FOP symbol. This also applies to products that are imported or packaged at retail.
 - 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.
- If a product carries the FOP symbol prior to January 1, 2026 it must comply with the regulations.
- Health Canada developed the regulations; Canadian Food Inspection Agency (CFIA) is responsible for enforcement.

FOP Nutrition Symbol Presentation

- The FOP symbol is black and white and consists of a solid white rectangular box with a thin black line border. It must be displayed on the PDP.
- It features a magnifying glass and highlights foods as high in saturated fat, sugars or sodium or a combination of these (based on the thresholds outlined in the FDR). The order of the nutrient bars is always saturated fat, sugars and sodium.
- The FDR details where and how the FOP symbol must be displayed on a pre-packaged product including size, location, and language. Schedule K.1 in the FDR contains images of 78 unique symbol formats.
- In most cases, the nutrition symbol will appear in a bilingual horizontal format showing English and French in the same symbol or a unilingual horizontal format showing English and French in separate symbols.
- If the threshold for only one nutrient of concern is met or exceeded, only that nutrient appears in the FOP symbol, as per the sample format shown on this slide.



Sample Format

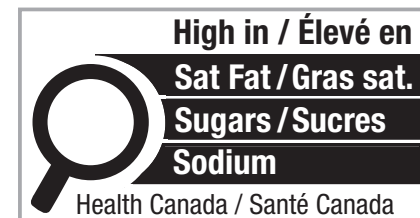
Met or exceeded threshold for one nutrient of concern

FOP Symbol Formats & Size

- There is a horizontal and vertical format. The horizontal format is the default.

The vertical format must be used when:

- The principal display surface (PDS) is $\leq 450 \text{ cm}^2$, and
 - The horizontal format otherwise required is wider than the PDP.
- Three bars must always appear in the symbol on packages with a PDS greater than 30 cm^2 .
 - The only bars that must appear in the symbol on packages with a PDS $\leq 30 \text{ cm}^2$ are the bars required to identify the product as "high in sat fat," "high in sugars," and/or "high in sodium."



Nutrient Thresholds for the FOP Nutrition Symbol

The thresholds for the FOP nutrition symbol are based on the Daily Values (DVs) for each nutrient of concern: saturated fat, sugars and/or sodium.

For most prepackaged products, a symbol must appear on the label when the amount of saturated fat, sugars and/or sodium is \geq (equal to or greater than) 15% of the applicable DV.

The % DV must be calculated using the amount of nutrient, by weight, per serving size OR per reference amount, whichever is greater, in the food as sold.

The % DV must be calculated using the applicable age-specific DVs.

[Link to Table of Daily Values](#)



Thresholds for FOP Nutrition Symbol: Expressed as percentage of the Daily Value (% DV)

Thresholds Depend on the Reference Amounts for Foods ¹	Saturated Fat	Sugars	Sodium
Prepackaged food with a reference amount \leq 30 g or 30 mL.	\geq 10% DV		
Prepackaged food with a reference amount $>$ 30 g or 30 mL that is not a main dish.	\geq 15% DV		
Prepackaged main dish with a reference amount \geq 200 g (when intended for children and/or adults) or \geq 170 g (when intended solely for children one to four years).	\geq 30% DV		

How to Determine if a Product Requires a FOP Symbol

Example: The serving size is greater than the reference amount (food does not contain trans fat)

Example Part A: Steps to Assess if a FOP Nutrition Symbol is Required

Product A	Serving Size	Reference Amount
(hypothetical product for adults and children)	75 grams	55 grams

Step 1	Identify for whom the product is intended. If the product is for children 1 to 4 years only OR for children and/or adults (1+). In this example Product A is for children and/or adults.
Step 2	Determine the quantity of food that must be used to assess the % DV of saturated fat, sugars and/or sodium against the FOP symbol threshold. Compare the serving size AND reference amount: the larger quantity must be used as the base quantity for the nutrient calculations. Product A serving size (75 g) would be used.
Step 3	Identify the applicable % DV threshold. In this example, the applicable threshold is $\geq 15\%$ DV because Product A is a prepackaged food with a reference amount > 30 g, and is not a main dish.
Step 4	Determine whether the amount of saturated fat, sugars and/or sodium in the base quantity meets or exceeds the threshold. Calculate the % DV for saturated fat, sugars and sodium and compare to the % DV threshold identified in Step 3. If the % DV for one or more of the nutrients is equal to or greater than the % DV threshold, a symbol for the nutrient(s) is required.

Note: Determining the % DV for Saturated Fat for FOP Labelling is Different than for NFt Labelling

FOP Labelling: Calculation for % DV for Saturated Fat

$$\frac{\text{Saturated fat content per serving size or reference amount (whichever is greater)}}{\text{DV for the sum of saturated fatty acids and trans fatty acids}} \times 100$$

NFt Labelling: Calculation for % DV for Saturated Fat

$$\frac{\text{Saturated fat and } \textit{trans} \text{ fat content combined per serving size}}{\text{DV for the sum of saturated fatty acids and trans fatty acids}} \times 100$$

The Table of Daily Values includes a DV for the sum of saturated fatty acids and trans fatty acids. There is no DV for saturated fat only.

Example Part B: How to Calculate % DV for FOP Nutrition Symbol Labelling

The Daily Value for a nutrient is set by Health Canada. To calculate the % DV:

- 1) Identify the appropriate DV for a nutrient in the Table of Daily Values (depending on who the product is intended for).
- 2) Divide the amount of a nutrient in the serving size (or reference amount when that is greater) by its Daily Value.
- 3) Multiply that number by 100.

Nutrient	Daily Value ¹	Amount of Nutrient in 75 gram Serving Size	Calculate % DV	% DV (rounded)
Saturated Fat ² (only)	20 g (incl. sat fat and trans)	5 g	= $5/20 \times 100$	25%
Sugars	100 g	10 g	= $10/100 \times 100$	10%
Sodium	2300 mg	450 g	= $450/2300 \times 100$	20%

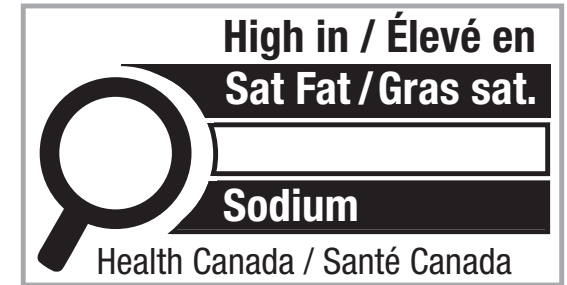
¹[Table of Daily Values](#)

² B.01.350, FDR: FOP symbol labelling purposes only: (the saturated fat content per serving size or reference amount, whichever is greater / DV for the sum of saturated fatty acids and trans fatty acids) x 100

Example Part C: How to Compare % DV to the % DV Thresholds

Product A (hypothetical product for adults and children)	Serving Size	Reference Amount
	75 grams	55 grams

Nutrient	% DV	FOP % DV Threshold	FOP Symbol?
Saturated Fat	25%	≥ 15% DV	YES
Sugars	10%		NO
Sodium	20%		YES



Notes: In this example, serving size is used because it is greater than the reference amount. The applicable threshold is ≥15% DV because Product A is a prepackaged food
 1) with a reference amount > 30 g,
 2) is intended for children and adults, and
 3) is not a main dish.

Exemptions: High Level Overview

1. Health-related exemptions – foods whose consumption should not be discouraged because they have recognized health protection benefits or that are important contributors of nutrients that Canadians do not get enough of

- Fresh, frozen, canned or dried fruits and vegetables that are whole or cut
- Plain milk (2%, 3.25%)
- Whole eggs
- Foods with a healthy fat profile, such as nuts, seeds and or their butters
- Individual rations for military service

2. Practical exemptions – foods on which the FOP symbol would be redundant

- Sweetening agents (e.g., table sugar, maple syrup, honey, molasses)
- Salts (e.g., table salt, celery salt, garlic salt, other seasoning salt)
- Butter, ghee and other fats and oils (e.g., vegetable oil, marine oil, margarine)

3. Technical exemptions – foods that are exempt from the Nutrition Facts Table (NfT), e.g.,

- Foods sold at farmers markets, roadside stands and craft shows
- Raw, single-ingredient meat and poultry (including ground, even though they are required to carry the NfT)
- Raw, single-ingredient fish
- Foods that are not sold directly to consumers, such as those intended for further manufacturing or institutional use
- Foods sold in very small packages, such as one-bite confections
- Individual portions of food that are intended to be served by a restaurant with meals, such as coffee creamers or crackers
- Milk and cream sold in refillable glass containers
- Foods prepared and processed from ingredients at retail

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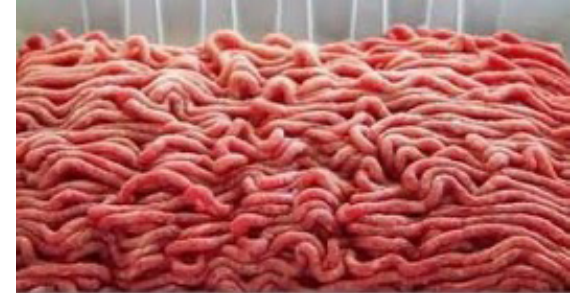
Front-of-Package Nutrition Symbol Labelling Considerations for Beef Products

Conditional Exemption from FOP Labelling

- Raw single ingredient meat, meat by-products, poultry meat or poultry meat by-products that are not ground.
 - This conditional exemption is associated with the Nutrition Facts table (NFt).
- Raw single ingredient meats, meat by-product, poultry or poultry meat by-products that are ground are always required to carry the NFt, however, they are conditionally exempt from the FOP requirement.

Loss of FOP Labelling Exemption: Ground Beef & Beef Cuts

- Ground meat, meat by-products, poultry meat or poultry meat by-products lose their FOP nutrition labelling exemption if the product label or any advertising of the product makes a claim regarding calories, a specific nutrient and/or makes a health claim. Refer to B.01.401(3)(a), (b) or (e), FDR.
- Raw single ingredient beef cuts lose their exemption from the FOP symbol requirements if they lose their exemption from the NfT requirement. The products lose their exemption from carrying an NfT if any of the triggers listed in subsection B.01.401(3) or section B.01.467 of the FDR are present.
 - If regulated parties choose to voluntarily display an NfT on an exempt product, such as beef cuts, the product keeps its conditional exemption from FOP label.
- Additional information on loss of exemptions can be found in the FOP Nutrition Symbol Labelling Guide for Industry Version 2.



Consideration for Prepared Meats

Prepackaged prepared meat, that is not a single ingredient meat product, is **not exempt** from FOP labelling and will have to carry a “high in” symbol if the product meets or exceeds any of the specified thresholds for saturated fat, sugars and/or sodium.



Sample Format

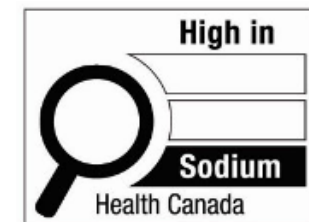
Met or exceeded threshold for one nutrient of concern

FOP Label for Prepackaged Products with an Assortment of Foods

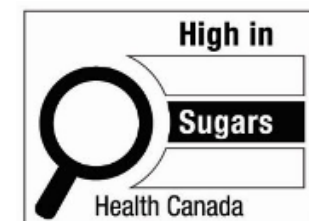
- Health Canada provides direction on FOP labelling for prepackaged products that contain an assortment of food and prepackaged products that contain either:
 - ingredients that are intended to be combined, or,
 - ingredients intended to be consumed together.
- **Example: Charcuterie Tray**
 - Assortment of foods of different types intended to be consumed together.
 - This product can use an aggregate NfT with information declared for each food.
 - Each food in the assortment is assessed individually against the FOP threshold. Conditional exemptions apply to eligible foods individually.
 - More than one symbol could be required.
 - Symbols must be displayed clearly to indicate which foods they apply to.



Salami, Crackers,
Chocolate covered almonds



Salami, Crackers



Chocolate covered almonds

Products with Scale Labels

- Products with a scale label can display the symbol as a separate sticker or printed directly on the scale label.
- In both cases, regulated parties must first try to display the FOP symbol on the PDP, in a way that meets the requirements for symbol location as set out in B.01.355(1), FDR.
- If it is not possible to meet the regulatory requirements for symbol location, products with a scale label may display the nutrition symbol anywhere on the scale label. Refer to Front-of-Package Nutrition Symbol Labelling Guide for Industry, Version 2, Figure 6.7 and Figure 6.8.



FOP label requirements for foods sold to retail but intended for hotels, restaurants and/or institutions

- In general, prepackaged products that are NOT intended to be sold directly to consumers are exempt from the NfT and FOP nutrition labelling requirements.
- There is an exemption for FOP labelling that applies to products such as:
 - prepackaged individual portions of food that are intended solely to be served by a restaurant or other commercial enterprise with meals or snack (B.01.350(5)(c), FDR);
 - ready-to-serve multiple-serving prepackaged products that are intended solely to be served in a commercial or industrial enterprise or an institution (B.01.350(5)(d), FDR);
 - prepackaged products that are intended solely for use as an ingredient in the manufacture of other prepackaged products intended for sale to a consumer at the retail level or as an ingredient in the preparation of food by a commercial or industrial enterprise or an institution (B.01.350(5)(e), FDR).
- If any of the prepackaged products mentioned above have the potential to be sold directly to consumers at retail, its label requires a symbol if the saturated fat, sugars and/or sodium content meets or exceeds the applicable threshold.
- If establishments prohibit entry to consumers and exclusively cater to commercial or institutional clients, then no FOP symbol would be required to be displayed on products sold within. However, if a business allows consumers to purchase food within their locations(s), even if they do not represent the bulk of their client base, then the FOP symbol would need to be displayed where applicable, as per the regulations. This would apply to any manufacturer providing prepackaged food to these establishments.
- It is encouraged that a discussion between the manufacturer and the retailer, regarding the intended use of these types of prepackaged products and how these will be sold, occur to determine what nutrition labelling requirements apply.

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APPENDIX & ADDITIONAL RESOURCES

IMPORTANT DEFINITIONS¹

Main dish: As defined in subsection B.01.001(1) of the FDR, means a combination dish, as set out in the Table of Reference Amounts, ***that does not require the addition of ingredients, other than water, for its preparation and that contains food from at least two of the following categories:***

- dairy products and their alternatives, except butter, cream, sour cream, ice cream, ice milk, sherbet and alternatives for those foods;
- meat products, poultry products, marine and fresh water animal products referred to in Division 21, and their alternatives such as eggs, tofu, legumes, nuts, seeds, nut or seed butters and spreads made from legumes;
- fruits and vegetables except pickles, relishes, olives and garnishes; and
- breads, breakfast cereals, rice and other grains, and alimentary pastes.

Reference amount: As defined in subsection B.01.001(1) of the FDR, means, in respect of a food set out in column 1 of the Table of Reference Amounts, the amount of that food set out in column 2.

Serving of stated size: The serving size is a specific amount of food upon which the nutrient information presented in the nutrition facts table is based. The serving size is a quantity of food that can be reasonably consumed at a single eating occasion.

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¹ Front-of-Package Nutrition Symbol Labelling Guide for Industry, Version 2

Guidance: Calculating % DV for Saturated Fat for Nutrition Facts Table vs. FOP Labelling

- The Table of Daily Values includes a DV for the sum of saturated fatty acids and trans fatty acids.
- There is no DV for saturated fat only. The % DV threshold for the “high in sat fat” symbol is based on the DV for the sum of saturated fatty acids and trans fatty acids and the % DV must be calculated using only the saturated fat content of the food.
- This differs from how to calculate the % DV for saturated fat and trans fat declared in the Nutrition Facts table (NFt). The % DV declared in the NFt must be calculated using the saturated fat and trans fat content combined.
 - % DV calculated for FOP labelling purposes: $(\text{saturated fat content per serving size or reference amount, whichever is greater} / \text{DV for the sum of saturated fatty acids and trans fatty acids}) \times 100$
 - % DV calculated for NFt labelling purposes: $(\text{saturated fat and trans fat content combined per serving size} / \text{DV for the sum of saturated fatty acids and trans fatty acids}) \times 100$

Additional Resources

[Regulations Amending the Food and Drug Act Food Symbols](#)

[Food and Drug Regulations \(FDR\)](#)

[Front-of-Package Nutrition Symbol Labelling Guide for Industry \(Version 2\)](#)

[Table of Reference Amounts for Food](#)

[Table of Daily Values](#)

Health Canada's webinar recording / downloadable PDF presentation on FOP program:

<https://drive.google.com/drive/folders/1Bm02xOjRaPKfHImCYTsH4RkjVTW1aeOL?usp=sharing>

Questions on the new requirements and their intent can be submitted to Health Canada at nut.labelling-etiquetage@hc-sc.gc.ca.

For questions dealing with [compliance and enforcement](#) activities, please refer to the implementation plan on the CFIA website.