U.S.A. – Canada Bilateral Labeling Guide

UNITED FRESH PRODUCE ASSOCIATION

CPMA ACDFL

For Retail, Master and Shipping Container Packaging of Fresh Fruits and Vegetables Prepared for Commerce in the U.S.A. and Canada

Legal Notice

U.S.A.

- This guidance tool is designed to assist in development of produce labels for consumer packaging and trade containers (shipping and master containers) that are in compliance with U.S.A. and/or Canadian food labeling regulations, including Quebec.
- This document contains non-binding recommandations. It is the obligation of the Responsible Party to ensure regulatory compliance of the products introduced into commerce.

CANADA

- CPMA makes every effort to ensure that accurate information is provided but cannot accept any responsibility for any errors or omissions no matter how caused, including but not limited to whether as a result of an error by CPMA or in change in policy by the Canadian Food Inspection Agency.
- It is important that members consult the pertinent acts and regulations prior to developing its package and nutrition labels for the Canadian marketplace.

Legal Notice

U.S.A.

- This guide is for information purposes only and is not intended to and does not constitute legal advice.
- Readers with questions beyond the scope of this guide may wish to consult with qualified legal counsel to ensure compliance with U.S.A. and/or Canadian law.

CANADA

- All information is provided "as is", without warranty or guarantee of any kind as to its accuracy, completeness, operability, fitness for particular purpose, or any other warranty, express or implied.
- CPMA shall not be liable for any damages, loss, expense or claim of loss arising from the use, or reliance on the information.

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Using The Guide

- The Guide is designed to be a user-friendly tool for use by those involved in the design of fresh produce labeling and packaging to be shipped and distributed in the U.S.A. and/or Canada, including Quebec, for both consumer packaging and master containers (RPC and shipping containers).
- The Guide will discuss and show with detailed graphics the requirements for labeling fresh-cut produce to be entered into commerce in both Canada and the U.S.A.

Important Information

- This guidance tool is designed to assist in development of produce labels for consumer packaging and trade containers (shipping and master containers) that are in compliance with U.S.A. and/or Canadian food labeling regulations, including Quebec.
- This document contains non-binding recommandations. It is the obligation of the Responsible Party to ensure regulatory compliance of the products introduced into commerce.
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Important Information

- Every attempt has been made to ensure this Guidance Document is accurate, correct and is up-to-date as of September 2016.
- Users should bear in mind that regulatory requirements and policies change over time and appropriate state and national regulations should be confirmed with the appropriate regulatory entities.
- Multiple Canadian and U.S.A. Reference Source links are included throughout the guidance document with a comprehensive list in Appendix A.
- A Glossary of terms is included in Appendix B.
- In the U.S.A., with very few exceptions, full compliance with federal requirements will fulfill all state requirements. In any event, no state requirement can supersede a federal requirement.
- States cannot discriminate against out-of-state products in a manner that burdens interstate commerce.

Important Information

Continued-

- As stated, this Guidance Document is not intended to provide legal advice. Specific labeling decisions should be based on a review of actual regulatory documents.
- Food may be deemed to be misbranded if its labeling is false, misleading or deceptive in any particular way.
- To meet language laws in Canada including Quebec*, all information, on or with consumer products must appear in both official languages (English and French) unless exempted**; the French translation must be of at least equal prominence*** to the English (or other languages, if present).

Reference sources are included throughout and at the end of this document.
****Example: Proper names (such as Robert Smith) and addresses, and in general trademarked items, etc.***
*****Please reference GLOSSARY located at the end of the presentation.***

Labeling Content Requirements

Retail Package of Fresh Fruits and Vegetables

Statement of Product Identity

U.S.A.

- Common name of food:
  - *Brand names are not statements of identity .*
- On the Principal Display Panel (PDP) and any alternate PDP.
- In bold face type in a size reasonably related to the most prominent printed matter on the front panel at least ½ the size of the largest print on the package.
- Do not crowd required labeling with artwork or non-required labeling.
- Exception for common name on package: bulk (commodity) produce sold at retail.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064872.htm

CANADA

- Common name of food:
  - *Apples must include variety name.*
- On the Principal Display Panel (PDP).
- In both French and English.
- Minimum height requirement of 1/16 inch (1.6mm) based on a lowercase letter "o".
- Exemption for common name on package: those fresh fruits or vegetables that are easily visible or identifiable in the package (open or transparent package).

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/common-name/eng/1354906212164/1354906290936

Statement of Product Identity

Examples of Common Name

U.S.A. Example

CANADA Example

This is an example of a double sided pouch with English and French on opposite sides using same size font.

Declaration of Net Quantity

U.S.A.

- Must appear on Principal Display Panel (PDP) in the bottom 30% of label.
- Must include Net Content on each PDP if more than one.
- Must be shown in both metric (grams, kilograms, milliliters, liters) and U.S.A. Customary System terms(ounces, pounds, fluid ounces).
- Metric statement either before or after or above or below the U.S.A. customary statement.
- Presented in terms of largest appropriate unit of measure.
- Minimum type size is the smallest type size that is permitted based on the space available for labeling.
- Net Weight or Net Count of Package Contents, does not include packaging material.

CANADA

- Must appear on Principal Display Panel (PDP).
- Must be expressed in terms of weight, volume, or numerical count. (numerical count required for heads of cauliflower or lettuce, stalks of celery, ears of sweet corn, or greenhouse cucumbers of Canada No. 1 grade)
- Only metric is required, however if U.S.A. measure or Canadian measure is also used it must be grouped with the metric with no intervening material and the metric units expressed first. U.S.A. measure where it is not equivalent to Canadian measure (e.g. volume) must be clearly stated as U.S.A.
- Minimum letter height requirement is according to the area of the principal display surface of the package.
- Net quantity must be rounded to 3 figures, unless below 100 then it must be rounded to two figures.

Declaration of Net Quantity

Continued-

U.S.A.

- Determine the height of the type by measuring the height of the lower case letter "o" or its equivalent when mixed upper and lower case letters are used, or the height of the upper case letters when only upper case letters are used.
- Prominent print style that is conspicuous and easy to read. The letters must not be more than three times as high as they are wide, and lettering must contrast sufficiently with the background to be easy to read.
- Do not crowd required labeling with artwork or non-required labeling.
- Exemption = when PDP area is 5 square inches or less (e.g., bands, twist ties, bib ties, etc.).

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064877.htm

CANADA

- Bold faced type, bilingual if wording used. Metric abbreviation symbols are considered bilingual and are case sensitive (lower case) with two exceptions: L for litre and mL for mililitres may be used. No brackets, punctuation etc.—A single space must be used to separate the number from symbol.
- The net weight contents declaration may not include any term qualifying a unit of weight, measure or count e.g., "Jumbo Quart", "not less than".
- Standardized package sizes exist for beets, carrots, rutabaga, potatoes, onions, and parsnips – products can only be sold in the prescribed sizes unless exempted under the Test Marketing Provision* of the Fresh Fruit and Vegetable Regulation.
- Exemptions to net quantity declaration:
  - strawberries & raspberries 1.14 L capacity or less packed in field
  - Master containers are exempt from net quantity declaration provided that a net quantity is displayed on the prepackaged containers within.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/net-quantity/eng/1389724204704/1389724328971

Declaration of Net Quantity

Examples of Net Quantity Statement

U.S.A. Examples

CANADA Examples

This is an example of a double sided pouch with English and French on opposite sides using same size font.

Declaration of Net Quantity

Examples of Net Quantity Statement

U.S.A. Examples

CANADA Examples

Responsible Party – Signature Line

U.S.A.

- Name of the manufacturer, packer or distributor.
- Unless the name given is the actual manufacturer, it must be accompanied by a qualifying phrase which states the firm's relation to the product (e.g., "manufactured for "or "distributed by").
- Conspicuously printed on the Information Panel.
- Use letters that are at least one-sixteenth (1/16) inch in height based on the lower case letter "o". The letters must not be more than three times as high as they are wide, and the lettering must contrast sufficiently with the background so as to be easy to read. Street address, city, state, and ZIP. Street address may be omitted if shown in phone directory.
- Do not crowd required labeling with artwork or non-required labeling.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064866.htm

CANADA

- Name of the manufacturer, packer or distributor along with the principal place of business .
- On any label panel except the bottom with a minimum letter height requirement of 1/16 in. (1.6 mm), based on lower case "o", in French or English.
- "Packaged for", "Distributed by" or other similar wording may be used provided in English and French.
- The principal place of business must be a physical location. Web sites, telephone numbers are not acceptable as principal place of business declarations.
- The address must be complete enough for delivery of communication in a timely manner. (e.g. civic address, city, province, postal code and country.)

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/place-of-business/eng/1387803744425/1387804951384

Responsible Party – Signature Line

Examples of Signature Line

U.S.A. Example

CANADA Example

Country of Origin Labeling
(COOL)

U.S.A.

- A statement of the country of origin on the labeling of imported foods is not required by the Federal Food, Drug, & Cosmetic Act. This is a requirement of the U.S. Customs and Border Protection (CBP)* as authorized by the Tariff Act of 1930 and CPB regulations (19 USC 1304(a) and 19 CFR Part 134).
- Re-packers are required by *CBP to mark containers of repackaged imports with the English name of the country of origin.
- In the event that further reprocessing or material added in another country results in a "substantial transformation" of the product, the other country becomes the country of origin within the meaning of *CBP's labeling requirements.

FDA Reference:
http://www.fda.gov/iceci/compliancemanuals/compliancepolicyguidancemanual/ucm074567.htm or https://www.ams.usda.gov/rules-regulations/cool/questions-answers

CANADA

- Every container of imported produce shall be labelled to show the words "Product of", "Produce of", "Grown in" or "Country of Origin", followed by the name of the country of origin of the produce, or other words which clearly indicate the country in which the produce was grown.
- Shown on the Principal Display Panel in bold and in close proximity to Net Quantity or grade name.
- Minimum letter height according to the area of the principal display surface of the package.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=12

Country of Origin Labeling
(COOL)

U.S.A.

- COOL may be satisfied in one of three ways; Package for retail sale; Shipping Container; or Bill of lading or invoice.
- Best practices include COOL on the individual unit for sale. Law requires that COOL be conspicuous. "Produce of", "Grown in" and "Product of" are all acceptable terms.
- CBP does allow for some abbreviations or variant spellings for marking purposes. Contact CBP for a list of acceptable abbreviations.
- If a domestic firm's name and address is declared as the firm responsible for distributing the product, then the country of origin statement must appear in close proximity to the name and address and be at least comparable in size of lettering. (FDA/CBP (Customs and Border Protection) Guidance[18] and Customs regulation 19 CFR 134[19]).

FDA Reference:
http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/labelingnutrition/ucm064872.htm#origin or
http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5074937

CANADA

- Country of origin information is to be presented in both English and French.
- U.S.A. is the only country whose abbreviation is allowed.
- Imported produce from multiple origins must name each country - e.g., (a package of 3 different colour peppers (3 different origins) - all origins to be named.

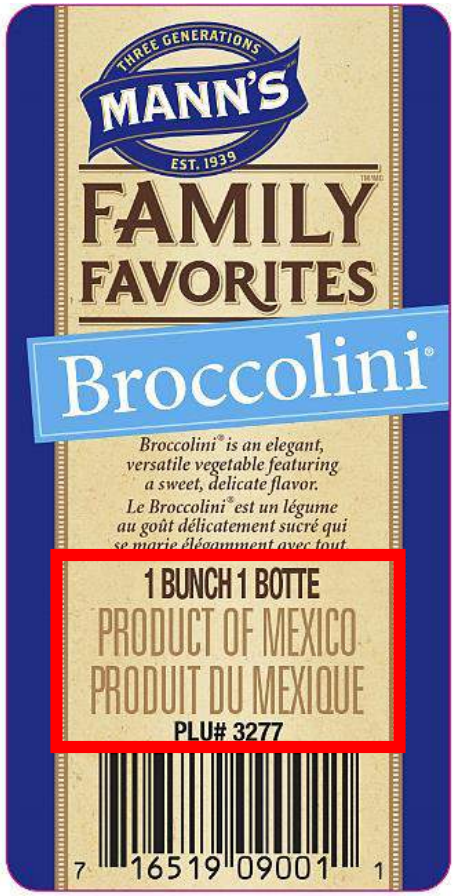
CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/origin/eng/1393622222140/1393622515592 or
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=12

Country of Origin Labeling

Examples of COOL

U.S.A. Example

CANADA Example



Grade Designation

U.S.A.

- Except for apples, there is no explicit requirement that fresh fruits or vegetables that have been graded must bear the grade mark on their packaging or master containers.
- The apple grade standards are some of the most detailed and complicated in the whole of 7 C.F.R. Part 51, which contains the grade standards for all commodities for which such standards have been established. The apple grade marking requirements, which are singular in Part 51, follow: http://www.ecfr.gov/cgi-bin/text-idx?SID=380053591fb47566cb863a4a05bfec39&node=pt7.2.51&rgn=div5#sp7.2.51.xx1

CANADA

- Fresh produce may be marketed in any suitable container, subject to the following:
  - Fresh produce for which a grade is established may have container size requirements and size limits; size of produce, if required by the Fresh Fruit and Vegetable Regulations, must be shown immediately adjacent to the grade name in the same sized print as the grade name
    The ***Fresh Fruit and Vegetable Regulations*** and the **Exemptions under the Test Marketing Provision of the *Fresh Fruit and Vegetable Regulations*** list should be consulted (See Reference section)
  - No person shall package produce in a container that bears a label that misrepresents the quality, quantity, composition, nature, safety, value, origin or variety of the contents.
  - Containers of produce shall not be so stained, soiled, warped, broken or otherwise damaged as to affect the shipping quality or saleability of the produce packed therein.
- No label of produce graded according to the FFVR or imported into Canada may be marked with any word or words declaring or implying that the produce packed therein is superior in quality to the grade marked thereon.
- Minimum letter height is according to the area of the principal display surface of the package. Reference: http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=10

Grade Designation

U.S.A.

- It would be a violation of laws and regulations of *both* the U.S. Department of Agriculture and the U.S. Food and Drug Administration to place an incorrect grade mark on the packaging of a product. In other words, if a product bears the USDA grade mark, it must have actually been graded and met the grade as indicated by the mark.
- For import grade regulations visit: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=025c38051bc5ce48c83bf5f030f86c03&ty=HTML&h=L&r=PART&n=pt7.8.944

CANADA

- Indicating the foreign grade is permitted on the labels of imported produce provided:
  - ✓ it is sold in its original container;
  - ✓ it conforms to a Canadian grade standard; and,
  - ✓ the grade name established in the country of origin of the produce represents substantially the same quality as the equivalent import grade name
- Foreign grade is also permitted on the labels of imported produce for which there are no grades established in Canada.
- On master containers, where the grade is easily and clearly discernible in or on the inner container without opening the outer container, the grade name need not be shown on the outer container.
- Master containers and shipping containers of imported produce are exempt from declaring a grade.

Ingredient Declaration

U.S.A.

- Common name required.
- Each ingredient listed in descending order of predominance.
- The ingredient list may be placed on the PDP, if information panel is not utilized.
- If information panel is used, the ingredient list must be placed under the nutrition facts.
- On the same label panel as the name and address of the manufacturer, packer or distributor.
- Use a type size that is at least 1/16 inch in height (based on the lower case "o") and that is prominent, conspicuous, and easy to read.
- "Ingredients may vary" cannot be used in the ingredient list.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064880.htm

CANADA

- Required for pre-packaged, including shipping and master containers* of multi-ingredient product. (includes shipping and master containers)
- On any surface but the bottom, 1/16th in. (1.6 mm) minimum letter height.
- In English and French
- Ingredients must be declared by their common name in descending order of their proportion by weight of a prepackaged product.
  - ✓ Allergens , sulphites and gluten sources may be declared in the ingredient list or in a "Contains statement"- see allergen slides
  - ✓ Organic ingredients must be identified in multi-ingredient product if organic claim is made
- When ingredients or components are omitted or substituted during a 12 month period; all of the ingredients that may be used in the 12 month period must be shown and clearly stated as a substitute or omission. (Example: Ingredients: baby romaine lettuces, spinach and/or kale, arugula)

*On master containers, where the ingredient list (or allergen information) is easily and clearly discernible in or on the inner container without opening the outer container, the ingredient list need not be shown on the outer container.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/list-of-ingredients-and-allergens/eng/1383612857522/1383612932341

Ingredient Declaration

Examples

U.S.A. Example

Nutrition Facts

Serving Size: about 4 cups (85g)
Servings Per Container: About 5

Amount Per Serving

Calories 20 — Calories from fat 0

	% Daily Value*
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 65mg	3%
Total Carbohydrate 3g	1%
Dietary Fiber 2g	8%
Sugars 0g	
Protein 2g	

Vitamin A 160% • Vitamin C 40%
Calcium 8% • Iron 15%

*Percent Day Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:
Fat 9 • Carbohydrate 4 • Protein 4

Ingredients: Organic Spinach, Organic Kale

CANADA Example

Ingredients: Organic spinach, organic kale
Ingrédients: Épinards biologique, chou frisé biologique

Ingredient declaration may be placed on any surface except the bottom of package.

Allergens

U.S.A.

- The Food Allergen Labeling and Consumer Protection Act (FALCPA) of 2004 is an amendment to the Federal Food, Drug, and Cosmetic Act and requires that the label of a food that contains an ingredient that is or contains protein from a "major food allergen" declare the presence of the allergen in the manner described by the law.
  - ✓ Under FALCPA, raw agricultural commodities (generally fresh fruits and vegetables) are exempt as are highly refined oils derived from one of the eight major food allergens and any ingredient derived from such highly refined oil.
- The allergen declaration must be declared in one of two ways:
  - ✓ The common name or usual name in the ingredient list of ingredients .
  - ✓ The word "Contains" followed by the name of the allergen immediately after the ingredient list.
- Precautionary labeling such as "May contain" should not be used.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106187.htm

CANADA

- When sulphites* (when 10 ppm or more, and not already required to be shown in a list of ingredients), priority allergens** or gluten sources are present in produce, through addition as ingredients, processing aids or wax coating components, their presence must be declared by the prescribed source names. The required source declaration, if not already required to be shown in a list of ingredients, may be declared in the list of ingredients***, if a list of ingredients is declared, or in a "Contains" statement on any label panel except the bottom of the package.
  - ✓ *Example: Wax coatings containing casein used on fresh produce, can declare "Contains milk"*
- Precautionary statements may be used, when despite all reasonable measures, the inadvertent presence of allergens in food is unavoidable. Precautionary statements are not a substitute for Good Manufacturing Practices.
  - ✓ There are no regulations stipulating the wording and location of precautionary statements, however the statement "May contain (name of the allergen)" is recommended.

*In Canada the use of sulphites is prohibited on any fruit or vegetable that is intended to be consumed raw, except grapes.

** In Canada, the ten (10) priority food allergens are peanuts, tree nuts (includes almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios or walnuts), sesame seeds, milk, eggs, fish (including crustaceans and shellfish), soy, wheat and triticale, mustard seeds and sulphites.

***On master containers, where the ingredient list and/or the allergen information is easily and clearly discernible in or on the inner container without opening the outer container, the ingredient list and/or the allergen information need not be shown on the outer container.

CFIA Reference: http://www.hc-sc.gc.ca/fn-an/securit/allerg/fa-aa/index-eng.php or http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/list-of-ingredients-and-allergens/eng/1383612857522/1383612932341?chap=2#s7c2

Sulphites

U.S.A.

- Any standardized food that contains a sulfiting agent or combination of sulfiting agents that is functional and provided for in the applicable standard or that is present in the finished food at a detectable level is misbranded unless the presence of the sulfiting agent or agents is declared on the label of the food. A detectable amount of sulfiting agent is 10 parts per million or more of the sulfite in the finished food.

- The sulphite declaration must be declared in one of two ways:

  - ✓ The common name or usual name in the ingredient list of ingredients .

  - ✓ The word "Contains" followed by the name of the allergen immediately after the ingredient list.

- Precautionary labeling such as "May contain" should not be used.

FDA Reference:

http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=101.100 or
http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=130.9

CANADA

- When sulphites (when 10 ppm or more **and not already required to be shown in a list of ingredients**), priority allergen or gluten sources are present in the produce in a prepackaged product or in a master or shipping container through addition as ingredients, processing aids or wax coating components, they must be declared by the prescribed source names, in an ingredient list*** or a "contains" statement, on any panel, except the bottom of the package.
- Sulphites that are declared in the list of ingredients must be shown as follows:
  - ✓ Sulphites that are a component of an ingredient that is shown in the list of ingredients must be shown either in parentheses immediately after the ingredient or at the end of that list where they may be shown in any order with the other ingredients that are shown at the end of that list under B.01.008(4) of the FDR [B.01.010.2(7)(a), FDR].
  - ✓ In all other cases, the sulphites must be shown at the end of the list of ingredients where they may be shown in any order with the other ingredients that are shown at the end of that list under subsection B.01.008(4) of the FDR [B.01.010.2(7)(b), FDR].

***On master containers, where the ingredient list and/or the allergen information is easily and clearly discernible in or on the inner container without opening the outer container, the ingredient list and/or the allergen information need not be shown on the outer container.

CFIA Reference:

http://www.hc-sc.gc.ca/fn-an/securit/allerg/fa-aa/index-eng.php
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/list-of-ingredients-and-allergens/eng/1383612857522/1383612932341?chap=2#s7c2

Gluten Claims

U.S.A.

- The claim "gluten-free" is voluntary. Food products bearing a gluten-free claim must meet FDA requirements.
- Foods may be labeled "gluten-free", "free of gluten", no gluten", "without gluten" if they are inherently gluten free; or do not contain an ingredient that is:
  - ✓ a gluten-containing grain (e.g., spelt wheat);
  - ✓ derived from a gluten-containing grain that has not been processed to remove gluten (e.g., wheat flour);
  - ✓ derived from a gluten-containing grain that has been processed to remove gluten (e.g., wheat starch), if the use of that ingredient results in the presence of 20 ppm or more gluten in the food.
- The placement of "gluten free" may be anywhere one the package as long as it does not interfere with mandatory labeling requirements.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm362510.htm

CANADA

- A gluten-free claim is any representation in labelling or advertising that states, suggests or implies that a food is free of gluten.
- Since fresh fruits and vegetables are inherently gluten-free, they can only make a general gluten-free claim stating that the 'product', like all similar products, is gluten free. (A "naturally gluten-free" claim is considered to have the same meaning). For example, the statement could declare "Gluten-Free, all fresh produce is inherently gluten-free".
- In order for a food to be represented as "gluten-free", it must comply with FDR B.24.018, must be factual and not misleading.

***On master containers, where the gluten claim is easily and clearly discernible in or on the inner container without opening the outer container, it need not be shown on the outer container

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/allergens-and-gluten/eng/1388152325341/1388152326591?chap=2

Nutrition Labeling

U.S.A.

- Nutrition labeling for raw produce (fruits and vegetables) is voluntary.
- Must appear on Information Panel or PDP or any alternate panel that can be seen by the consumer.
- Required when health or nutrient claim declared.
- Small packages (less than 12 sq. in. total surface area available to bear labeling) may be printed with a telephone number or an address to obtain nutrition information.
  - ✓ This exemption (using a telephone number or address in place of the Nutrition Facts label) is permitted only if there are no nutrient content claims or other nutrition information on the product label or in labeling and advertising.

CANADA

- Nutrition labelling for fresh fruits and vegetables, without added ingredients, is generally voluntary.
- Required when label or advertisement contains one or more of the following:
  - ✓ a health, functional or nutrient content claim is declared.
  - ✓ a health-related name, statement, logo, symbol, seal of approval or trade mark
- The Nutrition Facts table (NFT) must be in both English and French unless otherwise exempt from bilingual labelling. (no other language is acceptable).
- The Nutrition Facts table (NFT) must be on one continuous surface of the available display surface and is not allowed to continue over edges and corners onto a second surface or panel.

Nutrition Labeling
(Continued)

U.S.A.

- When nutrition labeling must appear in a second language, the nutrition information may be presented in a separate nutrition label for each language or in one nutrition label with the information in the second language following that in English.
- Numeric characters that are identical in both languages need not be repeated (e.g., "Protein/Protéines 2 g"). All required information must be included in both languages.

CANADA

- Only the Canadian Nutrition Facts table may be used to provide nutrition information in Canada. Nutrition Labelling Systems from another country are not acceptable.
- When there is sufficient space to do so, the Nutrition Facts table (NFT) must be oriented in the same manner as the other information on the label.

FDA Reference:
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064904.htm or
https://www.gpo.gov/fdsys/pkg/FR-2016-05-27/pdf/2016-11867.pdf or
http://www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/UCM501646.pdf

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/eng/1386881685057/1386881685870 and
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/presentation/eng/1387664849974/1387664998059?chap=1#s3c1

Note: In both USA and Canada - when a Nutrition Facts Table is included on packaging, it must contain mandatory core nutrient values. The percentage Daily Values (DV) for some nutrients in the U.S.A. and Canada may vary (E.g. Vitamin A, Calcium, Iron). FDA, CFIA and Health Canada are proposing to update the content and format of nutrition facts tables. At this time the initiative is in the consultation stage and may be subject to change.

Nutrition Labeling

Examples of Nutrition Facts

U.S.A. Examples

Original Label

Nutrition Facts

Serving Size 2/3 cup (55g)
Servings Per Container About 8

Amount Per Serving

Calories 230	Calories from Fat 72
	% Daily Value*
Total Fat 8g	**12%**
Saturated Fat 1g	**5%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 160mg	**7%**
Total Carbohydrate 37g	**12%**
Dietary Fiber 4g	**16%**
Sugars 1g	
Protein 3g	
Vitamin A	10%
Vitamin C	8%
Calcium	20%
Iron	45%

* Percent Daily Values are based on a 2,000 calorie diet. Your daily value may be higher or lower depending on your calorie needs.

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

New Label

Nutrition Facts

8 servings per container
Serving size **2/3 cup (55g)**

Amount per serving
Calories **230**

	% Daily Value*
Total Fat 8g	**10%**
Saturated Fat 1g	**5%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 160mg	**7%**
Total Carbohydrate 37g	**13%**
Dietary Fiber 4g	**14%**
Total Sugars 12g	
Includes 10g Added Sugars	**20%**
Protein 3g	
Vitamin D 2mcg	10%
Calcium 260mg	20%
Iron 8mg	45%
Potassium 235mg	6%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

On May 27th, 2016 FDA published final regulations changing the requirements for the Nutrition Facts panel required on almost all food packages.

CANADA Examples

Nutrition Facts
Valeur nutritive
Per 1/2 container (71 g)
pour 1/2 contenant (71 g)

Amount Teneur	% Daily Value % valeur quotidienne
Calories / Calories 35	
Fat / Lipides 0.5 g	**1 %**
Saturates / saturés 0 g + Trans / trans 0 g	**0 %**
Cholesterol / Cholestérol 0 mg	
Sodium / Sodium 30 mg	**1 %**
Carbohydrate / Glucides 7 g	**2 %**
Fibre / Fibres 2 g	**8 %**
Sugars / Sucres 2 g	
Protein / Protéines 2 g	
Vitamin A / Vitamine A	60 %
Vitamin C / Vitamine C	100 %
Calcium / Calcium	8 %
Iron / Fer	8 %

CFIA and Health Canada are proposing to update the content and format of nutrition facts tables. At this time the initiative is in the consultation stage and may be subject to change

Serving Size

U.S.A.

- The term *serving* or *serving size* means an amount of food customarily consumed per eating occasion by persons 4 years of age or older which is expressed in a common household measure that is appropriate to the food. Reference Amount Customarily Consumed (RACC)is used to derive a serving size for a particular product.
  - ✓ Products that are packaged and sold individually and contain less than 200 percent of the reference amount are required to be labeled as a single serving
  - ✓ If a unit weighs 200 percent or more of the reference amount, the manufacturer may declare one unit as the serving size if the whole unit can reasonably be consumed at a single-eating occasion.
  - ✓ For serving sizes halfway between two numbers of units, the serving size should be rounded up to the higher value.

FDA Reference:

http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064904.htm or http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d0beb53c5104a694c1655b0fe9e402c8&mc=true&n=pt21.2.101&r=PART&ty=HTML#se21.2.101_112 or http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=d0beb53c5104a694c1655b0fe9e402c8&mc=true&n=pt21.2.101&r=PART&ty=HTML#se21.2.101_19

CANADA

- The serving size is based on the edible portion of the food as offered for sale. It must be expressed in the Nutrition Facts Table as a consumer friendly measure (first) and in metric units (second, in brackets) in the same units as the net quantity declaration).
  - ✓ Examples of reasonable serving sizes for fresh fruits and vegetables can be found on slide 31 and 32.
- The entire net quantity in the package may be considered to be the serving size in the following cases:
  - ✓ The food packaged in the container could reasonably be eaten by one person at a single sitting.
  - ✓ The reference amount of the food is less than 100 g or 100 ml and the package contains less than 200 % of that reference amount.
  - ✓ The reference amount is 100 g or 100 ml or more and the package contains 150% or less of that reference amount.
  - ✓ The provision for a single serving container is not an optional requirement. Products that meet the requirements must provide nutrition information based on the net quantity of the entire package.

CFIA Reference:

http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/information-within-the-nutrition-facts-table/eng/1389198568400/1389198597278?chap=1#s2c1

Serving Size
Examples

U.S.A. The following is a sampling of reference amounts used as the basis for determining serving sizes for specific products.

Product Category	Reference Amount	Label Statement
Potatoes and Sweet Potatoes/Yams:		
French fries, hash browns, skins, or pancakes	70 g prepared; 85 g for frozen unprepared French fries	_ piece(s) (_ g) for large distinct pieces (e.g., patties, skins); 2.5 oz (70 g/_ pieces) for prepared fries; 3 oz (84 g/_ pieces) for unprepared fries
Plain, fresh, canned, or frozen	110 g for fresh or frozen; 125 g for vacuum packed; 160 g for canned in liquid	_ piece(s) (_ g) for discrete pieces;_ cup(s) (_ g) for sliced or chopped products
Salads:		
Pasta or potato salad	140 g	_ cup(s) (_ g)
All other salads, e.g., egg, fish, shellfish, bean, fruit, or vegetable salads	100 g	_ cup(s) (_ g)
Vegetables:		
Dried vegetables, dried tomatoes, sun-dried tomatoes, dried mushrooms, dried seaweed	5 g, add 5 g for products packaged in oil	_pieces(s) (_g); _cup(s)(_g)
Vegetables primarily used for garnish or flavor, e.g., pimento, parsley	4 g	_ piece(s) (_ g); _ tbsp(s) (_ g) for chopped products
Fresh or canned chili peppers, jalapeno peppers, other hot peppers, green onion	30 g	_ piece(s) (_ g); _ tbsp(s) (_ g); _ cup(s) (_ g) for sliced or chopped products
All other vegetables without sauce: fresh, canned, or frozen	85 g for fresh or frozen; 95 g for vacuum packed; 130 g for canned in liquid, cream-style corn, canned or stewed tomatoes, pumpkin, or winter squash	_ piece(s) (_ g) for large pieces (e.g., Brussels sprouts); _ cup(s) (_ g) for small pieces (e.g., cut corn, green peas); 3 oz (84 g/visual unit of measure) if not measurable by cup
All other vegetables with sauce: fresh, canned, or frozen	110 g	_ piece(s) (_ g) for large pieces (e.g.,Brussels sprouts); _ cup(s) (_ g) for small pieces (e.g., cut corn, green peas); 4 oz (112 g/visual unit of measure) if not measurable by cup
Sprouts, all types: Fresh or canned	¼ cup	_tbsp (_g)
Fruits and Fruit Juices:		
Dehydrated fruits—see snacks category		
Dried	40 g	_ piece(s) (_ g) for large pieces (e.g., dates, figs, prunes); _ cup(s) (_ g) for small pieces (e.g., raisins)
Watermelon	280 g	See footnote 13
All other fruits (except those listed as separate categories), fresh, canned, or frozen	140 g	_ piece(s) (_ g) for large pieces (e.g., strawberries, prunes, apricots, etc.); _ cup(s) (_ g) for small pieces (e.g., blueberries, raspberries, etc.)[13]

Serving Size
Examples

CANADA

The following is a sampling of reference amounts used as the basis for determining serving sizes for specific products.

Item	Product Category	Reference Amount[Table Note 1]	Serving Size[Table Note 2]
75	Fruit, fresh, canned or frozen, coated or uncoated, except those listed as a separate item *Apple sauce*	140 g 150 ml canned[Table Note 3]	110-160 g fresh or frozen, 120-150 ml canned
76	Candied or pickled fruit[Table Note 3]	30 g	30-40 g
77	Dried fruit, such as raisins, dates or figs	40 g	30-40 g
78	Fruit for garnish or flavour, such as maraschino cherries[Table Note 3]	4 g	1-3 cherries
80	Avocado, used as an ingredient	30 g	20-40 g
81	Cranberries, lemons and limes, used as ingredients	55 g	50-100 g
82	Watermelon, cantaloupe, honeydew and other melons	150 g	75-300 g
142	Vegetables without sauce, including cream style corn and stewed tomatoes, but not including vegetables without sauce listed as a separate item *(Onion rings, Breaded zucchini sticks)*	85 g fresh or frozen, 125 ml canned[Table Note 3]	70-100 g fresh, frozen
143	Vegetables with sauce	110 g fresh or frozen, 125 ml canned	95-125 g fresh or frozen, 80-175 ml canned
144	Vegetables primarily used for garnish or flavouring, fresh, canned or frozen, but not dried, such as parsley or garlic	4 g	4-5 g
145	Chili pepper and green onion	30 g	25-45 g
147	Lettuce and sprouts	65 g	50-75 g
149	Olives[Table Note 3] *Sun-dried tomato packed in oil*	15 g	*10-20 g* 3 to 5 olives *1 to 2 sundried tomatoes*
150	Pickles[Table Note 3] *Artichoke hearts*	30 g	1 dill pickle, 2 mini-dills or gherkins *1 artichoke heart*

Date Codes

U.S.A.

- FDA does not require food firms to place "Open Dating" on produce. This information is entirely at the discretion of the manufacturer. "Open Dating" (use of a calendar date as opposed to a code). It is not a safety date.
  - ✓ If a calendar date is used, it must express both the month and day of the month (and the year, in the case of shelf-stable and frozen products). If a calendar date is shown, immediately adjacent to the date must be a phrase explaining the meaning of that date such as "sell by" or "use before."
- There is no uniform or universally accepted system used for food dating in the United States.
  - ✓ A "Sell-By" date tells the store how long to display the product for sale. You should buy the product before the date expires.
  - ✓ A "Best if Used By (or Before)" date is recommended for best flavor or quality. It is not a purchase or safety date.
  - ✓ A "Use-By" date is the last date recommended for the use of the product while at peak quality. The date has been determined by the manufacturer of the product.

FDA Reference:
http://www.fsis.usda.gov/wps/wcm/connect/19013cb7-8a4d-474c-8bd7-bda76b9defb3/Food_Product_Dating.pdf?MOD=AJPERES

CANADA

- Fresh Fruit and vegetables are exempt from displaying a durable life date (best before date) but if used on consumer package it must follow regulatory format.
  - ✓ The "best before" date must be identified using the words "best before" and "meilleur avant" grouped together with the date, unless a clear explanation of the significance of the "best before" date appears elsewhere on the label.
  - ✓ The "best before" date may appear anywhere on the package. If it is placed on the bottom, this has to be indicated elsewhere on the label.
  - ✓ The month must be in both official languages or indicated by using specified bilingual symbols.
  - ✓ The year is optional, unless it is needed for the sake of clarity (for example, if the shelf life extends into a new calendar year).
  - ✓ If included, the year must appear first, followed by the month, then the day.
- If voluntary information is shown, must be declared in a proper format.

CFIA Reference:
http://www.inspection.gc.ca/food/information-for-consumers/fact-sheets/date/eng/1332357469487/1332357545633

Date Codes

Examples

U.S.A. Examples

- Best By
- Best If Used By
- Sell By
- There are multiple options for printing the date code including:

  YYYY/MM/DD (ISO 8601)

  MM/DD/YYYY

  MM/DD

  MM/DD

  MM/DD/YY

CANADA Examples

- Best before
  08 JA 30
  Meilleur avant
- Best before
  Meilleur avant
  08 JA 30
- Date format YYMMDD
- Acceptable abbreviations for months

Month	Abbreviation
January	JA
February	FE
March	MR
April	AL
May	MA
June	JN
July	JL
August	AU
September	SE
October	OC
November	NO
December	DE

Price Lookup (PLU)/GS1 DataBar

U.S.A.

- PLU (Price Look Up) codes and GS1 DataBar are used at retail to identify bulk produce (and related items such as nuts and herbs) to make check-out and inventory control easier, faster and more accurate. The use of the PLU codes and GS1DataBar is voluntary.
  - ✓ PLU codes are 4 or 5 digit numbers and will appear on a small sticker applied to the individual piece of fresh produce. The PLU number identifies produce items based upon various attributes which can include the commodity, variety, growing methodology (e.g. organic), and the size.
  - ✓ If a PLU Sticker is applied it is advisable to consider the primary function of the PLU label -accurate identification of the product - when making decisions relative to the design of the PLU label. Any peripheral information included on the label, such as brand identification, handling suggestions, country or region of origin, marketing slogans, should not be done so at the expense of the readability/legibility of the PLU number.
- COOL must be declared at Point of Sale and must be in a conspicuous location. COOL statements allowed:
  - ✓ "Produce of", "Grown in", "Product of".
  - ✓ The terms "or", "and/or" and "may contain" are not allowed.
  - ✓ Check boxes are allowed on Master Containers
- The law allows for comingling of product in retail bins as long as all countries are listed.
- A PLU sticker on produce does not fall in the "pre-labeled" category.
  - ✓ "Pre-labeled" items can include the product itself, consumer-ready packages and master containers.

Reference:
http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5074846
or http://www.ifpsglobal.com/Identification/PLU-Codes

CANADA

- PLU (Price Look-Up), includes PLU/GS1 DataBar, is a voluntary labelling system for bulk fresh fruits and vegetables. There are, in general, no language requirements for PLU labels at a Federal level but, product destined for the Quebec marketplace must meet the French language legislation of that province.
- All information unless exempted (see below) must be translated into French and be of at least same prominence. Exempt under the Quebec Charter of the French Language:
  - ✓ the firm name of a firm established exclusively outside Québec;
  - ✓ a name of origin, the denomination of an exotic product or foreign specialty, a heraldic motto or any other non-commercial motto;
  - ✓ a place name designating a place situated outside Québec or a place name in such other language as officialized by the Commission de toponymie du Québec, a family name, a given name or the name of a personality or character or a distinctive name of a cultural nature; and
  - ✓ a recognized trade mark within the meaning of the Trade Marks Act (R.S.C. (1985). c. T-13), unless a French version has been registered.
- The bilingual PLU commodity list is available on the following IFPS website: http://www.ifpsglobal.com/Portals/22/IFPS%20Documents/PLU_List_Commodity_Varietal_December%202014_Bilingual.pdf

Price Lookup (PLU)/GS1 DataBar

Examples

U.S.A.

CANADA

Universal Product Codes (UPC)

The Universal Product Code (UPC) is a bar code symbology (i.e., a specific type of barcode that is widely used in the United States, Canada, the United Kingdom, Australia, New Zealand, and in other countries for tracking trade items in stores.

The most common form, UPC-A, consists of 12 numerical digits, which are uniquely assigned to each trade item. a unique 12-digit number assigned to retail merchandise that identifies both the product and the vendor that sells the product. The UPC on a product typically appears adjacent to its bar code, the machine-readable representation of the UPC. The first six digits of the UPC are the vendor's unique identification number. All of the products that one vendor sells will have the same first six digits in their UPCs. The next five digits are the product's unique reference number that identifies the product within any one vendor's line of products. The last number is called the *check digit* that is used to verify that the UPC for that specific product is correct.

Universal Product Codes (UPC)

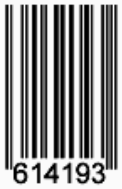
Examples

The Global Language of Business

EAN/UPC Family

The EAN/UPC family of symbols consists of the first and most widely deployed GS1 barcodes. EAN/UPC barcodes are suitable for the retail point-of-sale (POS) because they are designed for the high volume scanning environment. Applications are limited to GTIN, Restricted Circulation Numbers (RCN), coupons, and in-store codes.

EAN/UPC barcodes are also applied in general distribution and logistics environments. EAN/UPC minimal sizes are increased where they must be scanned at both retail POS and in general distribution.

	UPC-A	EAN-13	UPC-E	EAN-8
				
Symbol id	]E0	]E0	]E0	]E4
Capacity	12 Numeric	13 Numeric	12 Numeric, zeroes suppressed	8 Numeric
Omnidirectional?	Yes	Yes	Yes	Yes
GS1 Keys	GTIN-12	GTIN-13	GTIN-12	GTIN-8
Attributes?	No	No	No	No

GS1 Reference:
http://www.gs1.org/barcodes

GS1 Canada Reference:
http://www.gs1ca.org/pages/n/home/index.asp or
http://www.gs1ca.org/pages/n/standards/Barcode_Standards.asp

Exemptions
from labeling requirements

U.S.A.

Produce that is:

- Displayed in bulk in a retail store without any packaging.
- An open container of fresh fruit or vegetable which is not more than one dry quart (rigid or semi-rigid construction) which is not closed by lid.
- Prepackaged In a wrapper or otherwise other than an uncolored transparent wrapper which does not obscure contents.

FDA Reference:
Inspection Guides > Nutritional Labeling and Education Act (NLEA) Requirements (8/94 - 2/95) or http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.100

CANADA

Produce that is:

- Prepackaged In a wrapper or confining band that is less than ½ inch in width
- Displayed in bulk in a retail store
  - ✓ Unlabelled, except for bar codes, number codes, environmental statements and product treatment symbols, and packaged in an otherwise clear, transparent protective wrapping, or
  - ✓ Without any packaging

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=2

Storage Instructions – U.S.A

U.S.A.

- There are no refrigeration statements required for fresh fruit and vegetables imposed at the federal level.
- Some states may require retailers and wholesalers to follow any refrigeration statements that are placed on the produce by the producer.
- Retailers and foodservice operators may wish to consult with state or local public health authorities to determine whether any requirements have been imposed on retailers or foodservice operators.
- Requirements may have been imposed on whole intact fruits and vegetables and/or fresh-cut products.
- While some of these efforts may be well intentioned, the reader is advised that it is possible that such requirements do not conform with best industry practices for maintenance of quality and shelf-life for raw intact product.

Storage Instructions - Canada

CANADA

- Prepackaged products consisting of fresh fruits or fresh vegetables do not require storage instructions.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/date-markings-and-storage-instructions/eng/1328032988308/1328034259857?chap=1 or Food and Drug Regulations B.01.007 (3) http://laws-lois.justice.gc.ca/eng/regulations/c.r.c.,_c._870/index.html

Additional Packaging Labeling - Method of Production

GMO, Halal, Irradiation, Kosher, Organic

Users of this guidance document should consult with the appropriate labeling resources as there may be state and country regulatory labeling requirements for specific labeling claims and certifications.

GMO

U.S.A.

- Food manufacturers may voluntarily label their foods with information about whether the foods were not produced using bioengineering, as long as such information is truthful and not misleading. In general, an accurate statement about whether a food was not produced using bioengineering is one that provides information in a context that clearly refers to bioengineering technology. Examples of such statements include:
  - ✓ "Not bioengineered."
  - ✓ "Not genetically engineered."
  - ✓ "Not genetically modified through the use of modern biotechnology."
  - ✓ "We do not use ingredients that were produced using modern biotechnology."
  - ✓ "This oil is made from soybeans that were not genetically engineered."
  - ✓ "Our corn growers do not plant bioengineered seeds."
- As stated, FDA encourages manufacturers to use labeling claims that state that a food product (or its ingredients, as appropriate) was not developed using bioengineering, genetic engineering, or modern biotechnology such as the claims included above.

Reference:
http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/ucm059098.htm or
http://www.usda.gov/wps/portal/usda/usdahome?navid=BIOTECH&navtype=RT&parentnav=AGRICULTURE

CANADA

- There have been three major consultations since 1993 in Canada on the labelling of novel foods derived from genetic engineering. Based on these consultations, a set of guidelines were developed. They reflect a general consensus to:
  - ✓ require mandatory labelling if there is a health or safety concern, i.e., from allergens or a significant nutrient or compositional change (these decisions will be made by Health Canada), in order to inform consumers of the allergen or change,
  - ✓ ensure labelling is understandable, truthful and not misleading,
  - ✓ permit voluntary positive labelling on the condition that the claim is not misleading or deceptive and the claim itself is factual, and;
  - ✓ permit voluntary negative labelling on the condition that the claim is not misleading or deceptive and the claim itself is factual.
- Important criteria for making voluntary labelling and advertising claims that identify foods sold in Canada that are, or are not, products of genetic engineering can be found in the National Standard of Canada website, see link below.
- These principles are consistent with policy for all foods under the *Food and Drugs Act*

Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/method-of-production-claims/genetically-engineered-foods/eng/1333373177199/1333373638071 or National Standard of Canada
http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/internet/032-0315/index-eng.html

Halal

U.S.A.

- HALAL and ZABIAH HALAL: Products prepared by federally inspected packing plants identified with labels bearing references to "Halal" or "Zabiah Halal" must be handled according to Islamic law and under Islamic authority.
- All Federally inspected establishments are eligible to export to the UAE. If products are to be labeled "HALAL", the plant must be able to accommodate the Islamic requirements.
- The United Arab Emirates (UAE) typically requires foreign certifiers to undergo a visit by UAE authorities and a review of certification procedures and staffing as part of the approval process.
- For assistance in locating the nearest U.S. based Islamic Organizations approved as Halal certifiers: contact UAE Consulate:

The Embassy of the United Arab Emirates
3522 International Court, NW
Suite 400
Washington, D.C. 20008
Ph: (202) 243-2400
Fax: (202) 243-2432

USDA Reference:
http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/exporting-products/export-library-requirements-by-country/United-Arab-Emirates

CANADA

- In the labelling, packaging or advertising of a food, the *Food and Drug Regulations* prohibit the use of the word "halal" or any letters of the Arabic alphabet, or any other word, expression, depiction, sign, symbol, mark, device or other representation that indicates or that is likely to create an impression that the food is halal, unless the name of the person or body that has certified the food as halal is indicated on the label, package, or in the advertisement for that food [B.01.050, FDR].
- The name of the certifying body or person is required where the claim is being made, whether that is on the label or the package or in the advertisement. Having the name of the certifying body or person on one of these elements does not preclude it from being required to appear on the other elements when a halal claim is made.
- Acronyms and some company logos may not be easily recognizable to all consumers. Therefore, the complete name of the person or body that certified the food as halal must be present.
- There are no specific requirements on the proximity of a halal claim and the name of the person or body that certified the food to one another.
- The intent of the requirement is to provide additional information to consumers so as to enable them to make informed decisions about the food they purchase. Like all claims, halal claims must be truthful and not misleading.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/organic-claims/eng/1389725994094/1389726052482?chap=3#s2c3

Irradiation

U.S.A.

- Fresh fruits and vegetables (including lettuce and spinach) and seeds for sprouting (e.g. alfalfa sprouts) have been approved by the FDA for irradiation .
- The FDA requires that irradiated foods bear the international symbol for irradiation, the Radura Symbol, along with the statement "Treated with radiation" or "Treated by irradiation" on the food label.
- FDA requires the labeling of irradiated foods be prominent and conspicuous.
- Bulk foods, such as fruits and vegetables are required to be individually labeled or to have a label next to the sale container.
- FDA does not require that individual ingredients in multi-ingredient foods (e.g., spices) be labeled.

FDA Reference:
http://www.fda.gov/Food/IngredientsPackagingLabeling/IrradiatedFoodPackaging/ucm088992.htm or
http://www.fda.gov/Food/IngredientsPackagingLabeling/IrradiatedFoodPackaging/ucm081050.htm or
http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=911a36a52aad0759b094cf95b467782e&rgn=div5&view=text&node=21:3.0.1.1.10&idno=21

CANADA

- Currently, the only types of fresh produce approved for irradiation and sale in Canada are onions and potatoes. The purpose of irradiating onions and potatoes is to inhibit sprouting.
- Regulations for the labelling of irradiated foods are administered by the CFIA and apply equally to all domestic and imported foods sold in Canada.
- Require the identification of wholly irradiated foods on the labels of prepackaged products, master and shipping containers, as well as signs on accompanying bulk displays of irradiated foods.
  - ✓ Master container must carry the statement "Do not irradiate again
  - ✓ Shipping container -must carry one of the irradiation statements and the statement "Do not irradiate again
- The label or sign must clearly reveal that the food has been irradiated with both a written statement and the international Radura Symbol.
- Acceptable written statements to accompany this symbol include "irradiated", "treated with radiation" or "treated by irradiation" as these statements clearly reveal that the food has been irradiated. "
- Symbol must appear in close proximity to the written statement on the principal display panel or on the sign.
- Irradiated ingredients that constitute more than 10 percent of the final food must be identified in the list of ingredients as "irradiated".

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/irradiated-foods/eng/1334594151161/1334596074872

Kosher

U.S.A.

- "Kosher" may be used only on the labels of produce that are certified Kosher by rabbinical council.
- The Kosher symbol is a seal of approval and verifies that all ingredients and production processes comply with the Kosher certification standards.
- Food that is neither meat or dairy is called "Pareve". This means that they contain no meat or dairy derivatives and are not cooked or mixed with any meat or dairy foods. Fruits and Vegetables are classified as "Pareve".
- According to Jewish law, the following requires Kosher supervision:
  - ✓ Foods (meat, poultry, fish, dairy products, fruits and vegetables, grains, beverages and food additives
  - ✓ Utensils
  - ✓ Production process
  - ✓ Foodservice venues
- List of Kosher certifying agencies in the United States
  - ✓ http://www.crcweb.org/agency_list.php
- Kosher certified vegetables may not contain any insects as it is against the Jewish law.

Jewish Reference:
https://www.jewishvirtuallibrary.org/jsource/Judaism/kashrut.html orhttp://www.chabad.org/library/article_cdo/aid/82658/jewish/Meat-Dairy-and-Pareve.htm

CANADA

- Kosher, which means "fit" or "proper", describes foods and practices that are specifically permitted by Jewish dietary laws. Certification that a food is processed in accordance with the requirements of the Kashruth is made by a Rabbi or Rabbinical organization and identified by the appropriate Rabbi or Rabbinical organization symbol.
- In the labelling, packaging and advertising of a food, the *Food and Drug Regulations* prohibit the use of the word "kosher" or any letter of the Hebrew alphabet, or any other word, expression, depiction, sign, symbol, mark, device or other representation that indicates or that is likely to create an impression that the food is kosher, if the food does not meet the requirements of the Kashruth applicable to it [B.01.049, FDR].
- The terms "kosher style", "kind of kosher", and other similar terms are considered to create an impression that the food is kosher, and therefore, the food must meet the requirements of the Kashruth in order for these terms to be used. The terms "Jewish-style food" or "Jewish cuisine" are not necessarily considered to create the impression that the food is kosher.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/method-of-production-claims/eng/1389379565794/1389380926083?chap=0

Organic

U.S.A.

- Organic is a labeling term that indicates that the food or other agricultural product has been produced through approved organic methods and certified as organic under USDA's National Organic Program.
- Raw or processed agricultural products in the"100% organic" category must meet these criteria:
  - ✓ All ingredients must be certified organic.
  - ✓ Any processing aids must be organic.
  - ✓ Product labels must state the name of the certifying agent on the information panel.
  - ✓ May include USDA organic seal and/or 100 % organic claim.
  - ✓ Must identify organic ingredients (e.g., organic dill) or via asterisk or other mark.
- On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by,", identify the name of the certifying agent that certified the handler of the finished product (may display the business address, Internet address, or telephone number of the certifying agent in such label).
- Your certifying agent will review and approve each of your product labels to ensure compliance.

FDA Reference:
https://www.ams.usda.gov/rules-regulations/organic/labeling or
https://www.ams.usda.gov/grades-standards/organic-labeling-standards

CANADA

- An organic product is an agricultural product that has been certified as organic under the *Organic Products Regulations* (OPR).
- Must be certified by a CFIA-approved certification body; name of certification body must be on the label.
- If an equivalency arrangement exists certification must be to the terms of the agreement.
- The term "Certified organic" can only be used when followed by the term "by" and the (name of the certification body).
- If the Canada organic logo is on a label of an imported product, the statement "Product of" immediately preceding the name of the country of origin, or the statement "Imported" must be in close proximity to the logo.
- The "100% organic (product name)" claim is not permitted in Canada.
- All bilingual requirements apply to organic product labels.

CFIA Reference:
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/organic-claims/eng/1389725994094/1389726052482?chap=3#s2c3
or http://www.inspection.gc.ca/food/organic-products/certification-and-verification/certification-bodies/eng/1327860541218/1327860730201

Case Labeling Requirements

Master Containers, Shipping Containers Corrugate and RPC

Users of this guidance document should consult with the appropriate labeling resources as there may be commodity, state and country specific regulatory labeling requirements for the master and/or shipping container.

Master Containers

U.S.A.

- Users of this guidance document should consult with the appropriate labeling resources as there may be commodity, state and country specific regulatory labeling requirements for the master and/or shipping container. -e.g. *When post harvest treatments (e.g. pesticides, chemicals, wax application on apples/pears or chemicals or)have been applied.*
- (FDA/CBP (Customs and Border Protection) Guidance) If the retail packaging is visible, labeling is not required. If the information is not visible, the following information is needed:
  - ✓ Common name
  - ✓ The grade or quality
  - ✓ The numbers of packages in container
  - ✓ The weights and measures
  - ✓ The name and address of manufacturer or responsible party
  - ✓ The country of origin
  - ✓ If organic claim made, the name of the certification body

References:

http://www.cdfa.ca.gov/dms/programs/qc/qc.html or
http://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074567.htm

CANADA

- Master containers are to be labelled on the principal display panel with the following information *
  - ✓ Common name (and variety name for apples)
  - ✓ For imported product - Country of origin
  - ✓ For domestic produce - Grade name
- Other labelling requirements
  - ✓ Name and address of the responsible party
  - ✓ Allergen labelling (including sulphites) gluten claims, if applicable
  - ✓ Ingredient list (for multi-ingredient products if applicable)
  - ✓ Irradiation information, if applicable
  - ✓ If there are health or nutrient content claims made on the master container – a Canadian Nutrition Facts Table is required
  - ✓ If organic claims are made - -Name of the certification body required
- If not sold as consumer unit can be labelled in one of the official languages (English or French)**

*Where the produce or any of the information, including the common name, grade information, the country of origin, identity and principal place of business, allergen information, ingredient list, organic information is easily and clearly discernible in or on the inner container without opening the outer container (master container) , the same information need not be shown on the outer container. Master containers which will not be sold as units to consumers need not be marked with net quantity of the container.

** It is recommended that containers be prepared in both official languages and that the French translation is as prominent as the English to ensure compliance to Canadian language regulations in the event the container is used at the retail level or should your product be diverted to a different Canadian market than intended.

CFIA References:

http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=19#s5c19 or
http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/fresh-fruits-and-vegetables/eng/1393800946775/1393801047506?chap=18#s2c18

Shipping Containers

U.S.A.

- A shipping container that includes only bulk produce (e.g. individual apples, pears, peaches, potatoes, naked iceberg lettuce, etc.) and is not destined to be used for retail display the shipping container may include the following markings:
  - ✓ Name and address of packer, shipper
  - ✓ Country of Origin
  - ✓ Variety name (i.e. Golden Delicious)
  - ✓ Product Name – Apples
  - ✓ Product size or count
  - ✓ Net quantity in pounds
- On a multiunit retail package, a statement of the quantity of contents shall appear on the outside of the package and shall include:
  - ✓ The number of individual units
  - ✓ The quantity of each individual unit, and, in parentheses, the total quantity of contents of the multiunit package in terms of avoirdupois.
  - ✓ A multiunit retail package may thus be properly labeled: "6-16 oz bottles—(96 fl oz)" or "3-16 oz cans—(net wt. 48 oz)".
- For the purposes of this section, "multiunit retail package" means a package containing two or more individually packaged units of the identical commodity and in the same quantity, intended to be sold as part of the multiunit retail package but capable of being individually sold in full compliance with all requirements of the regulations in this part.
- Post harvest pesticides must be listed on the exterior of the box in an observable place by full chemical name.

FDA Reference: http://www.ecfr.gov/cgi-bin/text-idx?SID=ef18c0be3b9a6a11f67cab384d3f820d&mc=true&node=se21.2.101_1105&rgn=div8

CANADA

- Shipping containers are to be labelled on the principal display panel with the following information:
  - ✓ Common name (and variety name for apples)
  - ✓ Net contents
  - ✓ For imported product - Country of origin
  - ✓ For domestic produce - Grade name and size of produce if required in the Fresh Fruit and Vegetable Regulations
  - ✓ Other information required by grade (if applicable)
- Minimum letter height requirement for country of origin and grade name is according to the area of the principal display surface of the container.
- Other labelling requirements:
  - ✓ Name and address of the responsible party
  - ✓ Allergen labelling, if applicable
  - ✓ Irradiation information, if applicable
  - ✓ Ingredient list, if applicable (e.g. multi-ingredient product)
  - ✓ If there are health or nutrient content claims on the container, a Canadian Nutrition Facts Table is required
  - ✓ If organic claims are made - name of the CFIA approved certification body
- If not sold as consumer unit may be labelled in one of the official languages (English or French) *

*It is recommended that containers be prepared in both official languages, and that the French translation is as prominent as the English, to ensure compliance to Canadian language regulations in the event the container is used at the retail level or should your product be diverted to a different Canadian market than intended.

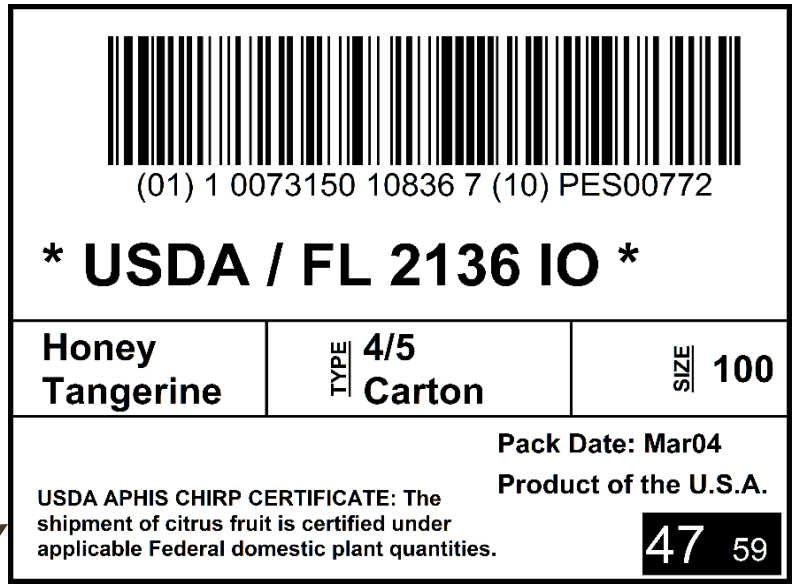
Shipping Containers

- Example of Recommended PTI Label On Corrugated Shipping Container

Reference:
http://www.producetraceability.org

Recommended PTI Standard Label Information

Recommended PTI Compliant* Corrugate and RPC* Label Including Regulatory Information



Example of Florida Regulatory Information

*Please note relative to the use of RPC's for display at the retail level in Canada – the RPC label is to be removed prior to display or adjusted to be in compliance with Canadian/Quebec language labelling regulations as covered in this guidance document.

RPC – Reusable Plastic Container

U.S.A.

- The use of RPC's in the produce trade is based upon request by the buy side trading partner.
- The design of the RPC has a specific location to provide the labeling information.
- For ease of use major U.S.A. and Canadian retailers have agreed upon one label design which can be used for regulatory compliance including the PTI when shipping into the U.S.A. or Canada.
- Consult with your Canadian trading partner if the RPC is destined to be used for display purposes.
- See following slides for RPC label specifications.

CANADA

- An ongoing national Test Market provides allowance for all required labelling including the declaration of net quantity, grade name, registration number and country of origin to be shown in letters and numerals of not less than 1/16 of an inch (1.6 mm) on washable, reusable plastic containers (RPC's) used as master or shipping containers.
- See *Exemptions under the Test Marketing Provision of the Fresh Fruit and Vegetable Regulations* at the following link: http://www.inspection.gc.ca/english/fssa/frefra/qual/tstmarkte.shtml

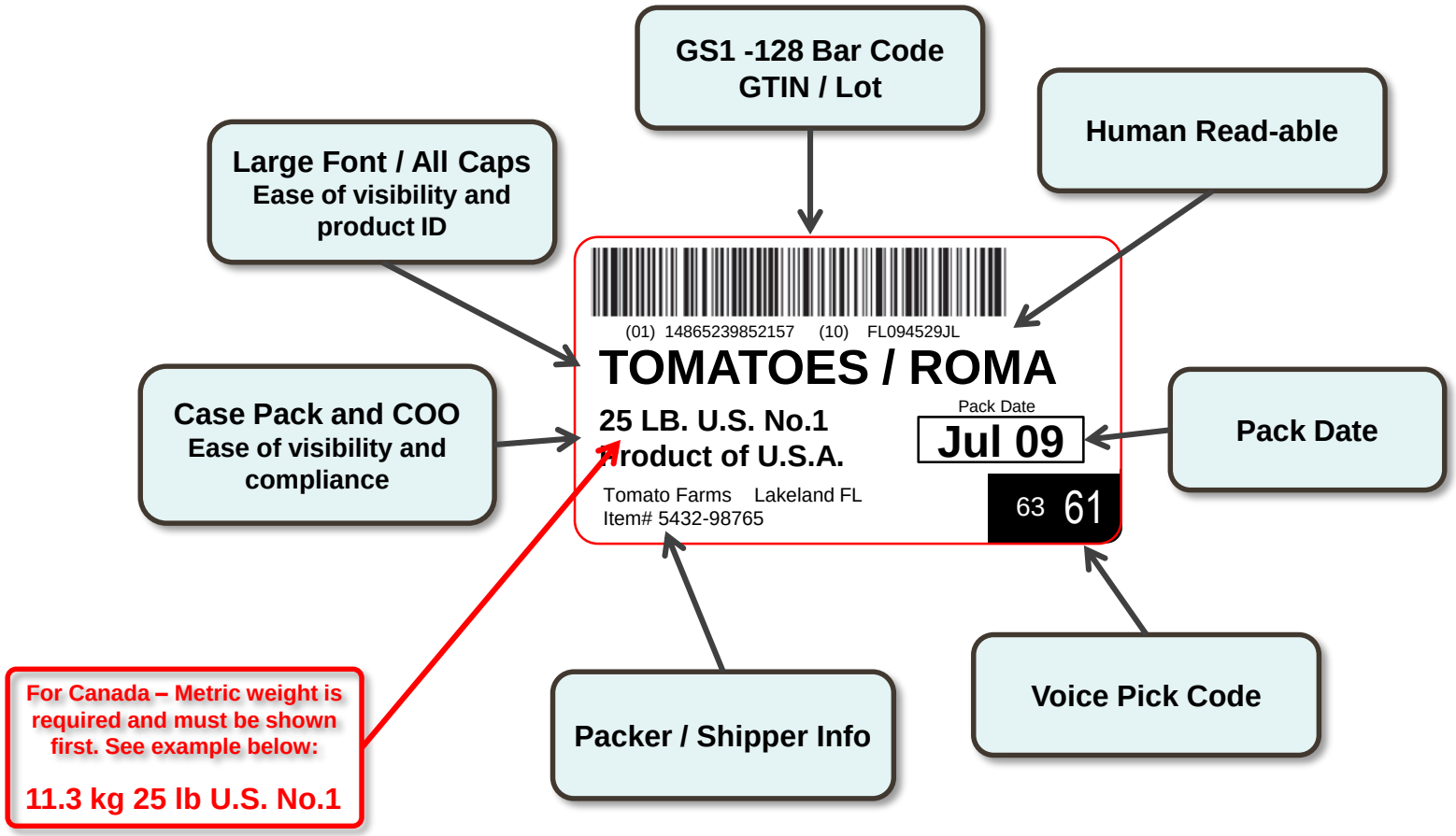
* Please note relative to the use of RPC's for display at the retail level in Canada – the RPC label is to be removed prior to display or adjusted to be in compliance with Canadian/Quebec language labelling regulations as covered in this guidance document.

RPC Labeling

- RPCs* are circulated through the supply chain many times. Because of this, RPC labels have some specific physical property requirements to ensure they adhere through the entire supply chain and then wash off at the sanitizing stations of the RPC pooler.
  - ✓ See Produce Traceability Initiative (PTI) Best Practices for Formatting Case Labels for additional guidance @ www.producetraceability.org

*Please note relative to the use of RPC's for display at the retail level in Canada – the RPC label is to be removed prior to display or adjusted to be in compliance with Canadian/Quebec language labelling regulations as covered in this guidance document.

Standard PTI RPC Case Label



Labeling Content Requirements

Optional Information

Optional Information

U.S.A.

- Health and nutrient content claims must be compliant.
- Specific commodities and states may require additional information when post harvest pesticides, chemicals or other treatments have been applied.
- Consult the appropriate commodity board or legislative body for the labeling requirements.
- Date labeling:
  - ✓ FDA does not require food firms to place "expired by", "use by" or "best before" dates on food products. This information is entirely at the discretion of the manufacturer or requested by your trading partner.

CANADA

- All Health and nutrient content claims must be compliant.
  - ✓ Note: health and nutrient claims acceptable in the U.S, may not be acceptable in Canada (e.g., Superfood, Power Foods, etc.)
- All optional information on consumer packaging must be presented in both official languages and French must be of at least equal prominence to the English to comply with Quebec language requirements.
- Prepackaged fresh fruits and vegetables are exempt from displaying a durable life date (best before date).
  - ✓ If voluntary information is shown, must be declared in a proper format.

Glossary of Terms – Appendix A

Country of Origin - COO	Where food was grown
FFV	Fresh Fruits and Vegetables
Information Panel	The information panel is the label panel immediately to the right of the PDP, as displayed to the consumer
Net Quantity	The net quantity of contents (net quantity statement) is the statement on the label which provides the amount of food in the container or package
Nutrition Labeling and Education Act (NLEA)	The Nutrition Labeling and Education Act of 1990 (NLEA) provides FDA with specific authority to require nutrition labeling of most foods regulated by the Agency; and to require that all nutrient content claims (i.e., 'high fiber', 'low fat', etc.) and health claims be consistent with agency regulations
Nutrition Facts Table (NFT)	Nutrition Facts Table
Principal Display Panel (PDP)	The portion of the package label that is most likely to be seen by the consumer at the time of purchase
Principal Display Surface (PDS)	In the case of a container that has a side or surface that is displayed or visible under normal or customary conditions of sale or use, the total area of such side or surface excluding the top, if any. In the case of a container that has a lid that is the part of the container displayed or visible under normal or customary conditions of sale or use, the total area of the top surface of the lid. In the case of a container that does not have a particular side or surface that is displayed or visible under normal or customary conditions of sale or use, any 40 per cent of the total surface area of the container, excluding the top and bottom, if any, if such 40 per cent can be displayed or visible under normal or customary conditions of sale or use. For more detail, please visit, http://www.inspection.gc.ca/
Statement of Product Identity	The name established by law or regulation, or in the absence thereof, the common or usual name of the food, if the food has one, should be used as the statement of identity. If there is none, then an appropriate descriptive name, that is not misleading, should be used. Brand names are not considered to be statements of identity and should not be unduly prominent compared to the statement of identity. 21 CFR 101.3(b) & (d)

Glossary of Terms – Appendix A

CBP	US Customs and Border Protection
Prominence	e.g., size, bolding, shading, number of times information appears on the label, etc.
Responsible Party	Grower, Manufacturer or Distributor of product
PTI	Produce Traceability Initiative
RPC	Reusable Plastic Container
Shipping Container	In Canada, a shipping container contains non-prepackaged loose/bulk produce, that is not destined for sale directly to consumers. In the U.S.A., there is no differentiation between shipping container and master container.
Master Container	In Canada, a master container is an outer container in which containers of prepackaged produce, which display a net quantity are packed. In the U.S.A., there is no differentiation between shipping container and master container.
UPC	Universal Product Code

U.S.A. Resources – Appendix B

- **Agricultural Marketing Services (AMS) COOL Labeling**
  - http://www.ams.usda.gov/AMSv1.0/cool
- **California Department of Food and Agriculture (CDFA)**
  - http://www.cdfa.ca.gov/dms/programs/qc/qc.html
- **GS1**
  - http://www.gs1.org
- **Northwest Horticultural Council**
  - http://nwhort.org/
- **Produce Traceability Initiative**
  - http://www.producetraceability.org/
- **The National Organic Program**
  - http://www.ams.usda.gov/AMSv1.0/NOPOrganicStandards

U.S.A. Resources – Appendix B

- **U.S. Customs and Border**
  - http://www.cbp.gov/trade/basic-import-export
- **U.S. Department of Agriculture**
  - Food Labeling http://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/labeling
- **U.S. FDA Code of Federal Regulations Title 21**
  - http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=101
- **U.S. FDA Food Labeling Guide**
  - http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm2006828.htm

Canada Resources – Appendix B

- **CFIA Food Labelling for Consumers**
  - http://www.inspection.gc.ca/food/labelling/food-labelling-for-consumers/eng/1400426541985/1400455563893
- **CFIA Food Labelling for Industry- Industry Labelling Tool**
  - http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/eng/1383607266489/1383607344939
- **CFIA Organic**
  - http://www.inspection.gc.ca/food/organic-products/eng/1300139461200/1300140373901
- **Consumer Packaging and Labelling Regulations (CPLR)**
  - http://laws.justice.gc.ca/eng/regulations/C.R.C.,_c._417/index.html
- **Food and Drug Regulation (FDR)**
  - http://laws.justice.gc.ca/eng/regulations/C.R.C.%2C_c._870/index.html
- **Fresh Fruit and Vegetable Regulations**
  - http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.%2C_c._285/index.html

Canada Resources – Appendix B

- **GS1 Canada**
  http://www.gs1ca.org/pages/n/home/index.asp
- **National Standard of Canada for Voluntary Labelling and Advertising of Foods that Are and Are Not Products of Genetic Engineering**
  http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/internet/032-0315/index-eng.htm
- **Quebec Charter of the French Language**
  - http://www.oqlf.gouv.qc.ca/english/regulations.html
  - **Exceptions to Section 51 of the Charter of the French Language**
    http://www2.publicationsduquebec.gouv.qc.ca/dynamicSearch/telecharge.php?type=3&file=/C_11/C11R9_A.HTM
- **Refrigeration Statement information**
  - http://www.gpo.gov/fdsys/pkg/FR-1997-02-24/html/97-4364.htm

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