



The stuff of legends

Confused over labelling fact or fiction? You're not alone

There comes a time when the many myths and legends surrounding food labelling must face the facts. For those of you still harbouring a few misunderstandings regarding Canada's food labelling requirements, here's a few mythbusters.

LANGUAGE

Perhaps the number 1 most misunderstood feature of Canadian food labelling is language. The common belief is that Canadian food labels must be in English and French at a minimum. For Canadians, the crafters and caretakers of bilingualism, it generally comes as a surprise that official bilingualism, from a federal retail package perspective, only applies to mandatory information such as, but not limited to, the common name, net contents, ingredient list and nutrition facts. Romance copy and preparation directions are not mandatory under federal regulations and need not be in English or French. Furthermore, prepackaged foods not for retail (for further manufacture or foodservice) are only required to include mandatory information in one of the official languages. There are some exceptions to the latter, but these are unique cases.

Quebec has its own language requirements. To label a food for sale in that province, French information must be presented on the label in equal prominence to any other language used. To sell food products across Canada, therefore, English and French will be on the label to some extent, and French will be at least equally prominent to any other language.

What certainly contributes to the confusion of labelling requirements is the multitude of federal and provincial regulations governing language.

PROCESSING AIDS

Almost everyone in the food labelling business refers to the term "processing aid." But does anyone actually know what this means in Canada? The term is often used in the context of not declaring an ingredient or component in a list of ingredients. It's a pretty daring thing not to declare an ingredient without a solid definition of a processing aid. Before you convince yourself that you understand processing aids, you should also understand that there is no clearly regulated definition of these. Unless exempt by some other regulation, all ingredients must be declared.

To fill in some of the void regarding processing aids the

Canadian Food Inspection Agency (CFIA) provides an administrative definition in the *Guide to Food Labelling Advertising*. However, it's woefully impractical in the context of most people's understanding of processing aids. As a result our American neighbours fare better, given their regulated definition of incidental additives. Unfortunately, applying this logical U.S. definition in Canada doesn't always work.

ALLERGEN LABELLING

If you've read any of my past columns, it won't come as a surprise to learn that federal regulations on food allergen labelling are weak, and in some cases counterintuitive to good labelling practices. Canadian food labels for the most part are kept up to par by labellers going above and beyond the requirements of current regulations and CFIA guidelines. More recently food labels have appeared with a "contains" statement (a common U.S. labelling feature today) following the list of ingredients, identifying the presence of priority allergens. However, this isn't mandatory in Canada. This statement also can't be used in Canada in lieu of proper ingredient nomenclature. Remember too that it's different than a "may contain" allergen statement, which identifies allergens that may be present as a result of unavoidable cross contamination. The latter is not mandatory either.

DATE CODING

Many manufacturers believe all foods must be date coded in Canada. This is not the case at all. In fact, there are several variants to date coding depending on the product. Generally, a product with a durable life of 90 days or less requires a best before date or a packed on date, as applicable. The appropriate storage conditions must also be listed on the label (for example, "keep refrigerated"). A durable life date (best before date) simply means that the product is of best appreciated quality before the date shown, but can still be consumed after this date. However, some products such as meal replacements and infant formula are required to include expiration dates. Low acid or commercially sterilized foods also require special date coding considerations.

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