

LABELLING : **Health Canada and CFIA's new requirement proposals**

Part 4 **A plan for the transition**

NEW REQUIREMENTS FOR LABELLING

Part 1

The first published changes

This part generally addressed Health Canada's new requirements.

These changes mainly concerned :

- Nutrition labelling
 - The Nutrition Facts Table
 - The serving size
- The list of ingredients

Part 2

The new proposed changes : be informed

This second part dealt generally with new proposals that have not yet been adopted.

These proposals come from two distinct entities :

- **Health Canada** and the Healthy Eating Strategy
- **Canadian Food Inspection Agency (CFIA)** and the Food Labeling Modernization Initiative (FLM)

Part 3

Understand implications for all stakeholders

This part focused on the impacts that these changes could have on food packaging.

It also listed how different departments of a company might be involved in this transition.

PLAN THE TRANSITION

A well-planned transition to avoid unpleasant surprises

As mentioned in the previous publications of this series, several elements can be considered in order to make a soft transition towards this major change.

On the following pages, you will find suggestions that can be adapted to your business to facilitate this transition.

Being well prepared can bring many benefits :

- From a financial point of view
- To avoid loss of packaging by managing inventories correctly
- To be on time to comply
- To avoid any other unpleasant surprise

ESTABLISH YOUR TRANSITION PLAN

1. Learn about the modifications



2. Determine the impacts



3. Share the information



4. Determine the actual delays required



5. Prioritize



6. Collect information



7. Determine and confirm what should appear on the packaging



8. Packaging Approval



9. Make the transition

1. LEARN ABOUT THE MODIFICATIONS

As seen in the previous publications in this series, the person who is responsible for the regulatory aspect should start by acquainting themselves to the changes that have been published and those that are in consultation.

If certain requirements are unclear, you will have to document yourself and get answers to your questions from the government or from external consultants.

For more information, you can consult our previous publications:



2. DETERMINE THE IMPACTS

Once the changes are known, it will be easier to understand the impacts that they may have on packaging.

It would be useful to do a preliminary study on each of your products and make a list of the changes that will be necessary to meet the new requirements in order to inform the team.

The following points could be validated :

- **Nutrition Facts Table**
 - *Serving size*
 - *Percent of Daily Value*
 - *Values*
 - *Format*
- **List of ingredients**
 - *Grouping of sugar-based ingredients*
 - *Additionnal space needed ?*
 - *Food colours*
- **Claims**
- **Front-of-package nutrition symbol**
 - *Should it be displayed?*
 - *Nutrients to include*
 - *Space needed*
- **Others**



3. SHARE THE INFORMATION

After learning about changes and potential impacts on packaging, it's time to share information with other departments in your organization.

Each department can certainly benefit from being well informed about the changes that will be necessary.

Moreover, if some other changes were already scheduled, all changes can be managed in a structured way.

Departments likely to be affected :

- Regulatory Affairs
- Research & Development
- Marketing
- Sales
- Purchasing
- Direction
- Other



4. DETERMINE THE ACTUAL DELAYS REQUIRED

Products offered to consumers (in-store) must comply with the deadline * set by Health Canada and the Canadian Food Inspection Agency.

This means that if your product has a shelf life of 1 year, you should start packing your products with your new packaging at least 1 year before the required deadline (December 14, 2021).

If necessary, you will also need to consider the time required to print and receive your new packaging.

* The deadline prescribed by the government will need to be confirmed as future updates will be published.



5. PRIORITIZE

With the different departments involved, you will be able to determine an order of priority for updating your packaging.

In order to determine this order of priority, you may wish to consider following elements :

- The products' shelf life;
- The list of changes to be made;
- Private label products;
- The different product lines;
- The modification of recipes.



6. COLLECT INFORMATION

A. Confirm the information that is already available

It may be that, for some ingredients, you already have the necessary information to make the transition.

B. Obtain the necessary information

It is important to be aware that your ingredient suppliers have the same deadlines as you to provide the information according to the new regulations.

- It could be interesting to take a step ahead and validate if they are familiar with these changes (especially if they are foreign suppliers) and confirm with them what their deadlines are. They will also have to make sure they understand the regulations in order to provide you with up-to-date information.
- Depending on the size of your business, you may have multiple suppliers to contact. You may have to prioritize information gathering according to the plan you have established.

According to the new regulations, the new basic information you should get is :

- The amount of potassium, calcium and iron in milligrams (mg).
- The name of each food colour if applicable.
- The sugar-based ingredients grouped in the declaration of ingredients, if there is no derogation.

7. DETERMINE AND CONFIRM WHAT SHOULD APPEAR ON THE PACKAGING

Once you have gathered all the information, you can confirm what will appear on the packaging.

- Validation of the list of ingredients (grouped sugar-based ingredients, food colours declared by their names);
- Creation of the new Nutrition Facts table
 - Calculation of the nutritional values of your products (by calculation, laboratory analysis or with the help of consultants);
 - Choice of the table to use;
 - Validation the portion indicated;
 - Other
- Determine the claims that may appear on the packaging and those that will need to be removed.

As of now, the changes to be made are those related to the new regulations in force published by Health Canada.

- If you make the transition before the proposed changes are officially published, they should not be applied to this release of packages. It is important to keep in mind, however, that other changes will come.

8. PACKAGING APPROVAL

The round of packaging approvals can now begin, making sure that:

- the graphic criteria are respected;
- all changes that are in effect at the time of the change are applied;
- all information is in accordance with the regulations.

Moreover, this round of approval should involve the following departments :

- Regulatory Affairs
- Marketing;
- Private Label Client (if applicable).



9. MAKE THE TRANSITION

Once the changes are made on the packaging, it will be important to remember to update the documentation that is related to the products according to the new requirements.

These documentation elements include :

- Technical sheets of the products;
- Private label specification sheets;
- Website;
- Advertising leaflets;
- Other internal documents.

Unfortunately, once the deadline is reached, all packages built with the current regulations could not be used. A good reason to plan carefully!



NOTE IMPORTANTE

For more information on the changes in force and proposed, you can refer to the [first two parts](#) of this series.

This document presents a suggestion for a transition plan that was developed in relation to the amendments as known on May 29, 2018.

This proposal is for informational purposes only. It should necessarily be adapted to your business reality.

References

For complete information on labelling modernization, please visit [Health Canada](#) and [CFIA](#) websites.



FOOD LABELLING MODERNIZATION

A series of four publications

Part 1

Do you know the changes currently in effect ?

- Changes to the nutrition facts table
- The new requirements regarding the list of ingredients

Part 2

New proposed changes :
Be informed

- Front-of-package nutrition labelling
- Date marking
- Food company information
- Etc, ...

Part 3

Understand implications for all stakeholders

- Understand the real impacts of these changes for your business
- The importance of sharing information with other departments

Part 4

A plan for the transition

- How to establish an effective transition plan
- Plan information gathering
- Make the transition as easy as possible



A SERIES TO READ AND TO KEEP

Subscribe to our [newsletter](#) to receive it directly.

[Read the whole series](#)

The Export Group will be conducting a food labelling training session under the new regulations on May 30th, 2018. [More information.](#)

Advisory Service on Regulations and Labelling



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LABELLING & REGULATION

Our services

Advisory Service on Regulations and Labelling - Canada and USA

- Preparation of Nutrition Facts Table
- Proposition of nutrition facts table format adapted to your package
- Label compliance verification
- Authentication and preparation of list of ingredients
- Claim validation or suggestion
- Regulatory information research and technical consultations

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