

2003 GUIDE TO FOOD LABELLING AND ADVERTISING

Chapter 7

Nutrient Content Claims

Chapter 7

Nutrient Content Claims

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Chapter 7

Nutrient Content Claims

Highlights of the 2002 Amendments to the *Food and Drug Regulations*

Nutrient content claims are limited to those permitted by the *Food and Drug Regulations*.

- ▶ Claims are permitted for *trans* fatty acids, omega-3 and omega-6 polyunsaturated fatty acids.
- ▶ “Free” claims are based on amounts of nutrients that are nutritionally insignificant or trivial in relation to current dietary recommendations.
- ▶ Criteria for saturated fatty acid claims (and in turn cholesterol claims) are linked to the *trans* fatty acid content of the food.
- ▶ The claim “X% fat-free” is permitted on foods that meet the criteria for, and are accompanied by, a “low fat” or “low in fat” statement.
- ▶ Modifiers such as “ultra” or “extra” cannot be used with claims such as “low fat” or “high fibre” to make them appear to be lower than low or higher than high.
- ▶ The nutrient content claim “light” can only be used for foods that are “reduced in fat” or “reduced in energy”. The claim “lightly salted” is also permitted.
- ▶ The word “light” may be used in reference to a sensory characteristic. However, when used in this manner, the name of the sensory characteristic being described must accompany the “light” claim (e.g., “light tasting” or “light colour”).
- ▶ Only a limited number of nutrient content claims can be made on foods for children under two.
- ▶ The claims “calorie-reduced”, “low calorie”, “free of sugars” and “low in sodium or salt” are no longer restricted to foods for special dietary use.
- ▶ The use of the words “diet” or “dietetic” are restricted to foods for special dietary use that meet the criteria for, and are labelled as, “free-”, “low”, “reduced” or “lower” in energy/Calories or “free of sugars”.
- ▶ Claims such as “low carbohydrate”, “source of complex carbohydrates”, “source of polyunsaturates/monounsaturates” are no longer permitted on foods.
- ▶ Nutrient content claims that are made for non-prepackaged foods or claims in advertisements placed by someone other than the manufacturer (such as trade associations or marketing boards) must be accompanied by a quantitative declaration of the energy value or the nutrient(s) as required for the claims.

7.1 Introduction

Nutrient content claims are statements or expressions which describe, directly or indirectly, the level of a nutrient in a food or a group of foods. **The regulations apply whether foods are sold to the trade, at retail, at restaurants or to other food service establishments.**

Nutrient content claims are now limited to those that are permitted by the *Food and Drug Regulations (FDR)*. Only the wording permitted in the regulations may be used. The regulations also prescribe the compositional criteria for each claim and any related additional labelling requirements. The conditions for some claims have been changed from what was previously in the regulations or in the *Guide*. Consult the appropriate item in the summary tables to make sure your food qualifies for the claim that you wish to make.

The objectives of these new regulations are to help consumers to make informed dietary choices in order to prevent injury to health. By restricting the types of claims that can be made as well as prescribing the conditions that a food must meet, and by making the nutritional profile mandatory, consumers can easily compare foods based on consistent information.

The compositional criteria for most of the nutrient content claims are based on regulated standardized “reference amounts” for foods as well as the “serving of stated size” for the particular food. (For an explanation of these terms, see 6.2 of this *Guide*.) These reference amounts are based on average quantities of food eaten at a single eating occasion. Having criteria for reference amounts in addition to the servings of stated size provides a uniform basis for claims for any specific category of food.

This chapter explains nutrient content claims and the criteria that must be met in order for each claim to be made. The chapter begins with general information and then describes the permitted claims for each nutrient. Information about biological role claims and the new health claims is presented in Chapter 8.

Note: For information on the nutrition labelling and nutrient content claim requirements for foods for children under two, refer to 5.13 of this *Guide*.

7.2 Transition Period

As described in 5.2 of this *Guide*, the nutrition labelling requirements to the *Food and Drug Regulations* provide for a three year transition period, making the Nutrition Facts table **mandatory** for most **prepackaged foods** beginning December 12, 2005. For small manufacturers, who had gross revenues from food sales in Canada of less than \$1,000,000 in the 12 months period prior to December 12, 2002, the transition period is five years, i.e., these companies will have to comply with the new regulations by December 12, 2007.

Until the Nutrition Facts table becomes mandatory, products may comply either with the new nutrition labelling regulations or with the previous regulations.

However, if a manufacturer chooses to make one of the following nutrient content claims either on the label of a food or in an advertisement for a food, the label **must comply fully with the new requirements**. These claims **do not** comply with the former regulations, but are part of the amendments to the *Food and Drug Regulations* [Section 38, amending regulations, *FDR* table following B.01.513].

- 100% fat-free (item 15)

- (Percentage) fat-free (item 16)
- Free of *trans* fatty acids (item 22)
- Reduced in *trans* fatty acids (item 23)
- Lower in *trans* fatty acids (item 24)
- Source of omega-3 polyunsaturated fatty acids (item 25)
- Source of omega-6 polyunsaturated fatty acids (item 26)

7.3 Permitted Nutrient Content References

The following types of references to the nutrient content of foods are permitted and may appear on the label of a food, or in advertisements for a food, provided any prescribed conditions are also met:

- nutrient content claims listed in column 4 of the table following B.01.513 [B.01.503];
- vitamin and mineral nutrient content claims [D.01.004(1) & D.02.002(1)];
- quantitative statements for nutrients e.g., “2 g of tryptophan per 80 g serving” [B.01.301]; and
- claims with nutrition implications such as biological role claims and diet-related health claims (see Chapter 8 of this *Guide*).

7.3.1 Other Permitted Nutrient-Related Statements [B.01.502(2)]

Certain names or statements are commonly used, while some are recognized or prescribed by legislation. Therefore, the following references are permitted as they do not contravene B.01.502(1):

- representations for which there are provisions in the *FDR*, such as prescribed common names like “unsweetened chocolate” or “mineral water” and prescribed statements like “X% meat protein” on meats with added phosphates;
- statements prescribed by Section 35 of the *Processed Products Regulations* (e.g., “packed in light syrup” on canned fruit, “X% sugar added” on frozen strawberries packed in sugar, etc.);
- statements required by Section 94(4) of the *Meat Inspection Regulations* (e.g., “extra lean ground beef”, “lean ground pork”, etc.);
- some established common names such as “defatted soybeans”, “high fructose corn syrup”, “demineralized water”, etc.;
- statements that characterize the amount of lactose in a food (e.g., “lactose-free” when lactose is non-detectable in the food);
- statements that characterize the percentage alcohol in a beverage (e.g., “14% alcohol by volume”);
- statements regarding the addition of salt or sugars to a food (e.g., “salted nuts”, “sweetened”, etc.);

Nutrition Labelling Tip

Some foods are exempted from showing the Nutrition Facts table under subsections B.01.401 (2)(a) and (b). If a reference or statement, express or implied, about one of the nutrients in the table to B.01.401 or B.01.402 is made, then the food loses its exempt status and the Nutrition Facts table must be shown (with any additional information, as required). This also applies in the case of the other permitted references and statements [B.01.401(3)(e), B.01.402(4)].

- the term “light salted fish”; and
- the term “lean” (in English only) when related to a prepackaged meal for use in weight-reduction or weight-maintenance diets.

7.4 Quantitative Declarations Outside the Nutrition Facts Table [B.01.301]

Energy value and the amount of many nutrients are required (or permitted) to be declared **inside** the Nutrition Facts table. However, quantitative declarations of energy value and the amount of nutrients per serving of stated size are also permitted **outside** the Nutrition Facts table, on labels or in advertisements, including on labels that are exempt from carrying a Nutrition Facts table, such as those for one-bite confections.

The nutrients permitted to be declared outside the Nutrition Facts table include:

- nutrients required or permitted inside the Nutrition Facts table,
- nutrients not required or permitted inside the Nutrition Facts table (e.g., named amino acids), and
- constituents of nutrients.

All quantitative declarations outside the Nutrition Facts table must be declared on the basis of a **serving of stated size** in the **units** specified in Table 7-1 of this chapter.

Note that the Regulations permit a declaration of the **% Daily Value** of a nutrient, per serving of stated size, outside the Nutrition Facts table, when a % Daily Value is required or permitted in the Nutrition Facts table [B.01.301(2)]. This applies to:

- any **core** nutrients (i.e., those listed in column 1 of the table to B.01.401), and
- any permitted additional nutrients (i.e., those listed in column 1 of the table to B.01.402).

Note: Other words must not be used to qualify quantitative declarations outside the Nutrition Facts table. Thus “0 g carbohydrates” would be acceptable but not “contains 0 g carbohydrates”.

Units Required for Quantitative Declarations
Outside the Nutrition Facts Table
Table 7-1

Subject	Units	Example
Energy	Calories (Cal)	4 Calories per 250 ml serving
Vitamins & Mineral Nutrients (except Sodium and Potassium)	mg, µg, RE, NE (as applicable and as set out in Table 1 to Division 1 & 2 of Part D, <i>FDR</i>)	316 mg of calcium per bar (40 g) 25 µg of folate per serving of 1 cup (250 mL) 31 RE of vitamin A per 2 tablespoon (30 mL) serving
Sodium, Potassium & Cholesterol	milligrams (mg)	451 mg potassium per banana (114 g)
Mineral Ion Content of Prepackaged Water or Ice	parts per million (ppm)	fluoride ion 2 ppm per bottle (500 mL) [see also B.12.002]
All Other Nutrients	grams (g)	0.4 g isoleucine per 125 mL serving 2 g of tryptophan per 80 g bar 0.1 g fat per 200 mL serving 0.2 g of DHA per 250 mL serving

7.5 Making Nutrient Content Claims: General Requirements

There are general conditions for making nutrient content claims which are outlined below. The table which follows B.01.513 sets out specific requirements for making each nutrient content claim. These are summarized later in this chapter starting in 7.14 of this *Guide*.

General Conditions for Making Nutrient Content Claims

Conditions for the Claim(s)	The food for which a claim is made and the label or advertisements containing or conveying the claim must meet any conditions set out for the claim in columns 2 and 3 of the table following B.01.513 [B.01.503(1)(a)&(b)]. Note: In order to make some claims, the food must meet compositional criteria for the nutrient content based on both the serving size and the reference amount. If no reference amount exists for a food in Schedule M, <i>FDR</i> (see 6.2.1 of this <i>Guide</i>), these particular claims cannot be made.
Size and Prominence	When a claim is made on the label or in any advertisement, all of the words, numbers, signs or symbols that are part of the claim must be of the same size and prominence [B.01.503(3)].
Placement of Accompanying Information	When a claim is made on the food label, the information required to accompany the claim must be adjacent to (without intervening material) the most prominent claim on the principal display panel; or when the claim is not on the front label, grouped with the most prominent claim elsewhere on the label, and in letters of the same size and prominence as the claim [B.01.504].
Language Requirements	All representations on the label must be in both English and French, unless B.01.012 (2) or (7) permits only one official language and the required information is shown in that language [B.01.501].
Nutrition Facts Table	When a nutrient content claim appears on a food that is exempt from showing the Nutrition Facts table [under B.01.401(2)(a) and (b)], then the exemption no longer applies, and the Nutrition Facts table must appear as prescribed [B.01.401(3)(e)].
Quantitative Declaration Related to the Claim	When a claim is made for a food, the nutrient that is the subject of the claim must appear in the Nutrition Facts table. In the absence of a Nutrition Facts table, a quantitative declaration of the energy value or nutrient value that is the subject of the claim must be provided on the label or in the advertisement.
Conditions for Advertising	Accompanying information, quantitative declarations and other advertising related issues are addressed in 7.11 of this <i>Guide</i> .

7.6 Altering the Wording of Permitted Nutrient Content Claims [B.01.511]

Wording for nutrient content claims set out in the table following B.01.513 are prescriptive and word-sets shown in quotations must not be altered unless permitted. Table 7-2 shows acceptable and unacceptable ways of making claims.

Altering Permitted Nutrient Content Claims
Table 7- 2

	Altering Nutrient Content Claims	Examples
1	Words, numbers, signs or symbols may accompany a label or advertising claim, providing they precede or follow the statement or claim, but are not interposed between the words of the statement or claim (subject to the requirements set out in points 2-4 in this table) [B.01.511(1)].	Unacceptable: "100% deliciously fat-free" Acceptable: "delicious and 100% fat-free"
2	Words such as "very", "ultra" and "extra" and other words, numbers, signs or symbols that change the nature of the statement or claim are prohibited [B.01.511(2)].	Unacceptable: "ultra low fat", "extra high protein", "super low energy", etc.
3	The brand name of a food may not accompany a claim regarding a food that has not been processed, formulated, reformulated or otherwise modified in order to meet the conditions set out for that claim [B.01.511(3)].	Unacceptable: "Brand Y olive oil is cholesterol free." "Brand X low fat carrots." "Like all carrots, Brand X carrots are low in fat." Acceptable: "Low in fat – all carrots are low in fat." "Carrots are low in fat."
4	Any claim regarding a food that has not been processed, formulated, reformulated or otherwise modified in order to meet the conditions set out for that claim, shall relate to all foods of that type and not only the specified food [B.01.511(4)].	Unacceptable: On an apple sauce label: "Low in fat" Acceptable: "Low in fat – all apple sauces are low in fat." "Olive Oil, a cholesterol-free food"
5	When more than one of the claims in column 4 of the table following B.01.513 are made on the label or in the advertisement for a food, the common elements of the claims may be conjoined rather than repeated [B.01.512].	Acceptable: "low in fat" and "low in sodium", "low in fat and sodium"

**7.7 Nutrient Content Claims for Vitamins and Minerals:
General Requirements**

The majority of permitted nutrient content claims, including those for sodium, are prescribed in column 4 of the table following B.01.513. However, nutrient content claims with respect to other vitamins and mineral nutrients are regulated by Part D of the *FDR* and are **not** covered in the table following B.01.513.

Claims may only be made for vitamins or mineral nutrients for which recommended daily intakes (RDIs) have been established [D.01.004(1)(a), D.02.002(1)(a)]. A minimum of **5% of the RDI per serving of stated size** must be present for the vitamin or mineral that is the subject of the claim. These RDIs, which are synonymous with Daily Value (DV) for these nutrients, are listed in Table I of both Division 1 and 2 of Part D of the *Food and Drug Regulations* and summarized later in Chapter 7 of this *Guide*. See 7.25 of this *Guide*.

7.8 Nutrient Content Claims on Foods Exempted or Prohibited from Showing a Nutrition Facts Table

The regulations exempt or prohibit certain foods from showing a **Nutrition Facts table** on their label. The following sections indicate how nutrient content claims may be made on these foods and what the relevant labelling requirements are.

7.8.1 Products Not Required to Show the Nutrition Facts Table [B.01.401(2)]

Non-prepackaged products and prepackaged products exempted from showing a Nutrition Facts table are **permitted** to make nutrient content claims or other permitted nutrition-related statements or representations on either the label for the food and/or in an advertisement. (For the exempted foods, see 5.3.2 of this *Guide*.) However, if a claim is made by or for the manufacturer for a prepackaged product exempted by B.01.401(2)(a) or (b), **it nullifies the exemption** and triggers the requirement to show an appropriate Nutrition Facts table [B.01.401(3)(e), B.01.402(4)].

When nutrient content claims are made, the label or advertisement must also comply with all the prescribed requirements, as applicable:

- the label must show the amount of any nutrient which is the subject of the claim, in the Nutrition Facts table, as applicable [B.01.402(4)]; and
- the food must meet the applicable conditions set out in column 2 of the table following B.01.513 and the label must also meet the conditions, if any, set out in column 3 [B.01.503(1)] (see Tables 7-3 - 7.16 in this *Guide*). For example, an “X% fat free” claim must be accompanied by a “low fat” statement.

The Nutrition Facts table is **not** required in the following cases:

- when a claim is made on a **non-prepackaged product**, such as on a sticker on bulk bins of fresh fruit, or
- when a claim for a prepackaged product is made in an advertisement by someone other than the manufacturer, such as a Marketing Board that advertises all brands of the product through a generic ad in which no brands are named
- when nutrient content claims are made on one-bite confections, on individual portions of food (those intended to be sold with meals or snacks by restaurants or other commercial enterprises) or on a variety of milks and goat milks packaged in glass bottles.

However, in the first two cases, a declaration of the applicable energy value or nutrient amount to support the claim must appear either on the label or in the advertisement [B.01.503(1)(c)].

7.8.2 Claims Made on Labels of Small Packages [B.01.467]

Foods with an available display surface of less than 100 cm² are considered to be “small packages” and do not have to carry a Nutrition Facts table **if** the outer side of the label of the product indicates to consumers how they may obtain the nutrition information that would otherwise be required in a Nutrition Facts table on the label (see 5.10 of this *Guide*).

However, when the labels on foods with an available display surface of less than 100 cm² carry a nutrient content claim, statement or representation, the labels **must display a Nutrition Facts table**: they no longer qualify to use a toll free telephone number or postal address.

In these cases, the options for smaller packages identified in 5.10 of this *Guide* will apply, including the specific **"alternative methods of presentation"** listed in B.01.466(1): a tag attached to the package, a package insert, the inner side of a label, a fold-out label or an outer sleeve, overwrap or collar.

7.8.3 Claims Made on Foods Prohibited from Showing a Nutrition Facts Table

Certain foods are prohibited from showing a Nutrition Facts table, or using the words “Nutrition Facts” or the French equivalents [B.01.401(5)]. These include:

- formulated liquid diets,
- human milk substitutes (such as infant formula),
- foods represented as containing human milk substitutes,
- meal replacements,
- nutritional supplements, or
- foods for use in very low energy diets.

The regulations for these foods already stipulate the required nutrition information that must appear on the label. However, these foods are permitted to make some nutrient content claims and other permitted claims on their labels and in advertising (**unless** the product is prohibited from being advertised to the general public, e.g., formulated liquid diets, foods for use in very low energy diets). A quantitative declaration of the energy value or amount of nutrient that is the subject of the claim must be made, if this information is not already provided with the nutrition information [B.01.301] (see 7.5 of this *Guide*). Note that Column 2 - (Conditions - Food) of the table following B.01.513 sets out requirements for some claims based on both the serving size and the reference amount, which are set out in Schedule M, *FDR* (see Table 6-3 of this *Guide*). Where no reference amount exists for a food, nutrient content claims based in part on a reference amount cannot be made.

7.9 Comparative Claims

Comparative claims are those that compare the nutritional properties of two or more foods. Examples of comparative claims include:

- "3 grams more fibre than 1 slice of Brand X bread"
- "33% less sodium than our regular potato chips"

Types of Comparative Claims [Table following B.01.513]

- Claims such as “reduced fat “ or “more protein”, etc. [items 3, 4, 6,10,13,14, 20, 21, 23, 24, 29, 30, 33, 34, 38, 39 and 44]
- “light in energy or fat” claims [item 45]
- “lightly salted” claims [item 36]

7.9.1 Conditions for Use of Comparative Claims

Only those comparative claims listed in the table following B.01.513 (and in the series of *Summary Tables* in this chapter of the *Guide*) may be used on food labels or in advertising. The tables (both in the *Food and Drug Regulations* and in this *Guide*) set out both the food conditions which must be met when making comparative claims (see column 2) and the labelling and advertising conditions (see column 3). In general, comparative claims must:

- involve similar foods, or foods of the same food group depending on the type of claim;
- clearly identify the foods being compared and the differences between them; and
- be based on differences which are both nutritionally and analytically significant.

See 7.25 of this *Guide* for comparative claims for vitamins and mineral nutrients.

7.9.2 Definitions [B.01.500]

“Combination foods” means the category of foods that contain as ingredients foods from more than one food group, or foods from one or more food groups mixed with foods from the category of “other foods”. Some examples include pizza (bread-type crust, vegetables, meat and cheese), lasagna (pasta, vegetables and cheese) and a prepared garlic bread (bread, butter and garlic).

“Food group” means one of the four following categories of foods:

- milk products and milk product alternatives such as fortified plant-based beverages;
- meat, poultry and fish, and alternatives such as legumes, eggs, tofu and peanut butter;
- bread and grain products; and
- vegetables and fruit.

These groups are similar to the four food groups presented in *Canada’s Food Guide to Healthy Eating*. (See Chapter 8, Annex 8-1 of this *Guide*.)

“Other foods” means foods that are not part of any food group, including:

- foods that are mostly fats and oils, such as butter, margarine, cooking oils and lard;
- foods that are mostly sugar, such as jam, honey, syrup and candies;
- snack foods, such as potato chips and pretzels;
- beverages, such as water, tea, coffee, alcohol and soft drinks; and
- herbs, spices and condiments, such as pickles, mustard and ketchup.

“Reference food of the same food group” means a food which can be substituted in the diet for the food to which it is compared, and which belongs:

- to the same food group as the food to which it is compared (e.g., cheese as a reference food for milk, or chicken as a reference food for tofu);
- to the category of other foods, if the food to which it is compared also belongs to that category (e.g., pretzels as a reference food for potato chips); or
- to the category of combination foods, if the food to which it is compared also belongs to that category (e.g., pizza as a reference food for lasagna).

These reference foods in the same food group do not have to be similar; they are used to make comparative claims, such as “lower in energy”, “lower in fat”, or “lower in saturated fatty acids”. A comparative claim might state, for example, that “our pretzels contain 90% less fat than our regular potato chips.”

“**Similar reference food**” means a food of the same type as the food to which it is compared and that has not been processed, formulated, reformulated or otherwise modified in a manner that increases or decreases either the energy value, or the amount of a nutrient that is the subject of the comparison. For example, whole milk is a similar reference food for partly skimmed milk; regular cola is a similar reference food for calorie-reduced cola; regular chocolate chip cookies are a similar reference food for fat-reduced chocolate chip cookies.

Similar reference foods are useful for comparing a “regular” product with a product that has had its nutritional content intentionally increased or decreased, e.g., “more energy”, “more protein”, “more fibre”, “reduced in energy” and “reduced in sugars”. For example, the fat content of skim milk (which has had most of the fat removed) can be compared to the fat content of whole milk.

7.9.3 Labelling Requirements for Comparative Claims

When a comparative statement is made on the food label, the accompanying information must be adjacent to the most prominent comparative statement on the principal display panel (e.g., on the front label or, when the claim is not on the front label, grouped with the most prominent claim elsewhere on the label), and shown in letters of at least the same size and prominence. “Adjacent to” means there can be no intervening material between the claim and the accompanying information [B.01.504].

Advertising

When comparative claims are made in advertisements, the accompanying information must be set out according to the media-specific requirements of B.01.505 and B.01.506. See 7.11 of this *Guide*.

Comparative Claim Example – A granola bar

See item 13 of the table following B.01.513,* *Reduced in fat*, to evaluate the claim:
“30% lower in fat than our regular granola bar”

Food conditions

- the “lower in fat” granola bar must have a minimum of 25% less fat than the similar reference food (e.g., the regular granola bar); and
- the similar reference food (e.g., the regular granola bar), must not qualify as “low in fat”.

Label conditions

- the “similar reference food” (e.g., the regular granola bar) must be identified;
- the amounts of the food being compared must be stated, unless they are the same; and
- the difference must be expressed per serving of stated size (as a percentage, a fraction or in grams).

* See also *Table 7-5 – Summary Table of Fat Claims*, item d) in this *Guide*.

7.9.4 Comparative Claims for Vitamin and Mineral Nutrients

Comparative claims relating to the content of vitamins and mineral nutrients in foods are not mentioned in the table following B.01.513 but similar rules for use as those discussed above would apply. See 7.25.5 and item e) of Table 7-16 of this *Guide* for further information.

7.10 “Light” Claims [item 45, table following B.01.513]

Light in energy or fat: The use of “light” (or any other phonetic rendering of the word such as “lite”), as a nutrition claim is restricted to foods that meet the criteria for either “reduced in fat” or “reduced in energy”. See 7.14.2, Table 7-3 for light energy claims and 7.16.1, Table 7-5 for light fat claims.

Note: For “light” in energy or fat claims, the similar reference food used for comparative purposes must have a nutrient value that is **representative** of foods of that type that have not been processed, formulated, reformulated or otherwise modified in a manner that increases the energy value or the amount of fat [B.01.500.(2)]. For instance, ice cream with a milk fat content of 11% cannot be compared with ice cream that has a milk fat content of 18% for the purposes of a “light” claim. Although the 11% milk fat ice cream has considerably less fat than an 18% milk fat ice cream, the 18% milk fat ice cream is not representative of the ice cream market.

Lightly salted: The claim “lightly salted” is acceptable, when used as set out in item 36 of the table following B.01.513. The food must contain **50% less added sodium** than the similar reference food which is not low in sodium or salt. See 7.21.2 and Table 7-10 of this *Guide* for further information.

7.10.1 Other Permitted “Light” Claims

There are some other instances where the term “light” may be used in conjunction with the nutrient content of a food or in other contexts.

- The English statement or claim “light” may be used in accordance with subsection 12(1) of the *Maple Products Regulations* (light or extra light maple syrup) [B.01.513(2)(a)].
- The statement “light” or “léger” may be used with respect to rum (light rum) [B.01.513(2)(b)].
- “Light salted fish” is an acceptable term [B.01.502(2)(k)].
- Section 35 of the *Processed Products Regulations* describes light syrup requirements for certain foods [B.01.502(2)(b)] .
- The *Food and Drug Regulations* contain a standard for light beer which refers to a reduced alcohol content [B.01.502(2)(a)].
- In addition, “light”, “lite”, or any phonetic rendering of the word may be used on food labels or in advertising to describe **sensory** characteristics of a food (e.g., “light tasting”, “lite coloured”). In these cases, the sensory characteristic must always accompany the claim [B.01.513(1)].

7.11 Advertising Requirements for Nutrient Content Claims

7.11.1 General Requirements and Definitions

Nutrient content claims that are presented in any form of advertising must meet all applicable conditions outlined above. Detailed requirements are listed in the tables in 7.14 to 7.26 of this *Guide*. The specific requirements for advertising vitamins and mineral nutrients are addressed in 7.11.5 below. Annex 2 to this chapter provides a decision tree for the advertising requirements for nutrient content claims.

“**Manufacturer**” or “**distributor**” means a person or persons (including an association or partnership) who, under their own name, or under a trade-, design or word mark, trade name or other name, word or mark controlled by them, sell a food or drug. This includes importers or retailers who control the food in question [A.01.010].

Advertisements placed by or on the direction of the manufacturer include, but are not limited to, advertisements for which the manufacturer has paid, public service spots which are sponsored by the manufacturer, advertisements placed on behalf of the manufacturer by an advertising agency or media outlet, information placed on the manufacturer’s Web site and other forms of advertisements or publicity under the control of the manufacturer.

Throughout the text of this chapter, these types of advertisements are referred to as “advertisements placed by the manufacturer”.

When a **manufacturer places an advertisement for a prepackaged food** and makes a nutrient content claim, any additional information triggered by the claim must be shown in the Nutrition Facts table. Foods exempted under B.01.401(2) (a) and (b) lose their exemption and must show an appropriate Nutrition Facts table.

Information Required in Support of a Nutrient Content Claim

The following information is required in support of a claim, as applicable [B.01.503]

- a statement of the energy value in Calories per serving of stated size for energy claims;
- the amount of the nutrient per serving of stated size for nutrient content claims.

Additional information may also be required as set out in Column 3 - See tables 7-3 - 7-16.

Sometimes, advertisements for prepackaged products are **not made or placed by or on the direction of the manufacturer**, but rather by a third party such as a marketing board, a non-governmental health organization or other organizations without label control (OWL). Nutrient content claims are permitted to appear in these advertisements. The required nutrition information in support of the claim must appear in the advertisement whenever it does not appear on the product label [B.01.503(1)(c)]. See the box above for more information.

Similarly, when nutrient content claims are made in advertisements for **non-prepackaged foods**, the required nutrition information in support of the claim must appear either in the advertisement or on the label.

7.11.2 Media-Specific Requirements for Nutrient Content Claims [B.01.505, B.01.506]

Requirements vary, depending on whether:

- the advertisement is for radio or television;
- the advertisement is for other types of media (such as print, flyers, billboards, internet, etc.);
- the advertisement is placed by the manufacturer; or
- the advertisement is placed by someone other than the manufacturer.

Additional information is required to accompany the following claims:

- comparative claims, such as “reduced fat “ or “more protein”, etc. [items 3, 4, 6, 10, 13, 14, 20, 21, 23, 24, 29, 30, 33, 34, 38, 39 and 44];
- “light in energy or fat” claims [item 45];
- “lightly salted” claims [item 36]; and
- “(Percentage) fat-free” claims [item 16]

as outlined in the table following B.01.513 and in the Summary Tables.

7.11.3 Advertisements Other Than Those for Radio or Television [B.01.503.(1)(c), B.01.505.]

Ads for prepackaged foods placed by the manufacturer:

When the manufacturer is responsible for ads for prepackaged foods, the advertisement **must** contain all required accompanying information, as stipulated under column 3 in the table following B.01.513. The Nutrition Facts table on the label must show any additional information triggered by the claim.

Ads for non-prepackaged foods, or ads placed by someone other than the manufacturer: When someone other than the manufacturer is responsible for ads for a prepackaged food, or when the ad is for a non-prepackaged food, the ad must contain all required accompanying information, and **it must also contain** a quantitative statement – that is, the energy value or amount of nutrient content that is the subject of the claim, per serving of stated size.

Regardless of who places the ad, **placement of accompanying information does not change**. The required accompanying information must be placed adjacent to the statement or claim, or if the claim appears more than once, adjacent to the most prominent statement or claim. There must **not** be any intervening printed, written or graphic material between the claim and the accompanying information, and the required information must appear in letters that are the same size and prominence as the most prominent statement or claim.

7.11.4 Advertisements for Radio or Television

When nutrient content claims listed in 7.11.2 are made in television or radio advertisements, all applicable conditions [as set out in column 3 of the table following B.01.513], must be met.

Exceptions apply to the following claims:

- the “reduced (nutrient)” claims [items 3, 13, 20, 23, 29, 33, and 38],
- the “light salted” claim [item 36], and
- the “light in energy or fat” claims [item 45].

Note: In these cases, advertisers have an option with respect to the similar reference food. If desired, the similar reference food does not have to be named in the advertisement, if it is shown on the product label.

When someone **other than the manufacturer** is responsible for a nutrient claim in a radio or television advertisement **for a prepackaged product**, or an ad is placed for a **non packaged product**, the advertisement must state the relevant energy value or nutrient value, per serving of stated size (see 7.4 of this *Guide*).

Note that for ads placed by someone other than the manufacturer, the similar reference food **must be named** in the television or radio advertisement. It is not sufficient to only mention the similar reference food on the label.

Regardless of who places the ad, however, **placement of accompanying information does not change**.

- When the claim or statement is made in the **audio** portion (including the tag line*) or in both the audio and visual portions of the ad, the accompanying information must immediately precede or follow the claim in audio form [B.01.506(3), (4)(a)];
- When the claim or statement is made only in the **visual** portion of the ad (in the video super** for instance), the accompanying information may be made in either the visual or the audio portion of the ad [B.01.506(4)(b)].

When the accompanying information is presented in the visual portion of the ad (i.e., in the video super**), it must:

- appear concurrently with, and for the same amount of time as, the claim or statement,
- be adjacent to the claim or the most prominent claim or statement with no intervening graphics or print, and
- be in the same type size, height and prominence as the most prominent claim or statement [B.01.506(5)].

* A tag line is any corporate signature, slogan or claim, in audio or video that embodies, represents or defines an identified product or brand.

** A video super is any advertising copy in the video portion of a broadcast message – i.e., print or type on-screen.

7.11.5 Advertisements Making Vitamin and Mineral Nutrient Content Claims [D.01.004, D.02.002]

Claims about the vitamin and mineral nutrient content of foods may only be made when an established Recommended Daily Intake (RDI) exists for that vitamin or mineral nutrient and when the food contains at least 5% of the RDI for the vitamin or mineral nutrient. The vitamin or mineral nutrient content must always be declared as a percentage of the Daily Value (% DV) per serving of stated size, except where provided for elsewhere in the *FDR*. Refer to 7.25 of this *Guide* for further information about vitamin and mineral nutrient content claims.

When a **manufacturer places an advertisement for a prepackaged food** and makes a nutrient content claim, any additional information triggered by the claim must be shown in the Nutrition Facts table. Foods exempted under B.01.401(2) (a) and (b) lose their exemption and must show an appropriate Nutrition Facts table.

Where a statement or claim is made about a vitamin or mineral nutrient for a **non-packaged product**, or when a claim is made for a **prepackaged food by someone other than the manufacturer**, the % DV per serving of stated size for the vitamin or mineral nutrient must be shown in the ad.

Placement of the accompanying information is similar to that outlined above in 7.11.3 and 7.11.4. The criteria are as follows.

For ads other than those on radio or tv, the % DV per serving of stated size for the vitamin or mineral nutrient triggered by the claim must be stated in the ad. It must be adjacent to the statement or claim, or if the claim appears more than once, adjacent to the most prominent statement or claim. The % DV must be shown in letters of at least the same size and prominence as those of the statement or claim, and there must **not** be any intervening printed, written or graphic material between the claim and the % DV.

For a radio ad, the % DV per serving of stated size for the vitamin or mineral nutrient triggered by the claim must be stated immediately preceding or following the statement or claim.

For a television ad:

- When the claim or statement about the vitamin or mineral content is made in either the **audio portion** of the ad or in both the **audio and the visual portions** of the ad, the % DV per serving of stated size for the vitamins or mineral nutrients triggered by the claim must also be stated in the audio portion of the ad, immediately preceding or following the statement or claim.
- When the statement or claim is made **only in the visual portion** of the television ad (i.e. the video super), the % DV per serving of stated size for the vitamins or mineral nutrients may be provided either in the audio or the visual portion.
 - If the % DV is stated in the audio portion, it must immediately follow or precede the statement or claim.
 - If the % DV is stated in the visual portion of the ad, it must appear concurrently and for at least the same amount of time as the statement or claim. If the statement or claim is made only once, the % DV must be adjacent to it, without any intervening printed, written or graphic material. If the statement or claim is made more than once, the % DV must be adjacent to the most prominent statement or claim, in the same size and prominence.

7.12 Nutrient Content Claims Made in Restaurants [B.01.503.(1)(c)]

A Nutrition Facts table is not required for foods sold in restaurants. However, nutrient content claims are permitted and may be found in various promotional (i.e, advertising) material such as menu boards, menus, table tents, posters, etc.

When a nutrient content claim is made, the applicable energy value or nutrient amount must be stated in the ad, per serving of stated size, along with any another other supporting information required (by column 3 of the table following B.01.513).

7.13 How to Use the Claims Tables

The tables in this chapter list the nutrient content claims permitted for foods. In order for a nutrient content claim to be made:

- (a) the food must meet the compositional criteria for the claim (see column 2 “Conditions – Food”), and
- (b) the label or the advertisement must state the specific information required for that claim (see column 3, “Conditions – Label or Advertisement”).

Other related claims may be permitted. These claims are also shown in the tables.

The claims tables in this chapter differ from the table following B.01.513 in the *FDR* in the presentation of information. The differences are explained using the excerpt below from *Table 7-3 – Summary Table of Energy and Calorie Claims*.

Column 1 Claims	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
a) Free of energy "free of energy" "energy-free" "no energy" "0 energy" "zero energy" "without energy" "contains no energy" "Calorie-free" "free of Calories" "no Calories" "0 Calories" "zero Calories" "without Calories" "contains no Calories"	The food provides less than 5 Calories or 21 kilojoules per reference amount and serving of stated size.	Must comply with general requirements for nutrient content claims - see 7.5 of this <i>Guide</i> Nutrition Facts table required on products otherwise exempted by <i>FDR</i> B.01.401(2)(a) and (b) When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i> All other applicable requirements must be met.	B.01.401(3) (e)(ii) Table following B.01.513, item 1

Column 1 is a combination of both column 1 and column 4 of the table to B.01.513 in the *FDR*. Column 1 specifies the claims that can be made. The titles in bold print are the subjects from column 1 of the table following B.01.513 and are used so that references to the table can be easily made. The claims in quotation marks come from Column 4 of the table following B.01.513. Only the claims indicated in quotations may be used and they must be **worded exactly** as indicated. Where there are a number of claims in quotes, any one can be used.

Other permitted references, if any, to the nutrient content of foods, are also shown in column 1. These references are not prescribed in the table following B.01.513 so have not been bolded and are not in quotations. There may be some flexibility in their wording. For example, "sweetened" is a permitted claim, although there is no prescribed criteria for its use.

Column 1 lists the claims that are permitted to describe a product as **Free of energy**, i.e., "energy-free", "free of energy", "no energy", "0 energy", "zero energy", "without energy", "contains no energy", "Calorie-free", "free of Calories", "no Calories", "0 Calories", "zero Calories", "without Calories" or "contains no Calories".

Column 2, "Conditions – Food" is identical to column 2 of the table following B.01.513. It specifies the compositional criteria required of foods making a claim set out in column 1. The compositional criteria is based on the reference amount and/or serving size of a food, covered in Chapter 6 of this *Guide*.

Column 2 specifies that foods making one of the listed **Free of energy** claims must provide less than 5 Calories or 21 kilojoules per **reference amount** and **serving of stated size**.

Column 3 sets out any labelling or advertising requirements for products making claims permitted in column 1. This includes the same information provided by column 3 of the table following B.01.513, as well as other pertinent information.

Column 3, in this case, does not set out any specific labelling requirements for the claim "free of energy". However, it does state the following references:

- The manner in which the claim is made must be in accordance with the regulations summarized in this *Guide*.
- While the Nutrition Facts table, including an energy declaration, is mandatory on most prepackaged foods, some products are exempt. Products lose their exemption once a "free of energy" claim is made.

Column 4 provides references to the relevant sections in the *Food and Drug Regulations*.

7.14 Energy and Calorie Claims

This section deals with implied and explicit energy claims. See Table 7-3, *Summary Table of Energy and Calorie Claims*, for the permitted nutrient content claims.

7.14.1 Changes to the *Food and Drug Regulations*

The revised *FDR* introduced several changes.

- The claim, “More Energy” is now permitted. See item f) in Table 7-3, Summary Table of Energy and Calorie Claims.
- Foods for special dietary use can be labelled as “diet” or “dietetic” if they meet the criteria for, and are labelled with, one of the following claims: “free of energy”, “low in energy”, “reduced in energy” and “lower in energy”. See items a) through d) in Table 7-3, Summary Table of Energy and Calorie Claims.
- The use of “Light” in nutrient content claims is now restricted to foods that meet either the “reduced in energy” claim (see item c) in Table 7-3 below) or the “reduced in fat” claim found in Table 7-5, Summary Table of Fat Claims.

7.14.2 Superlative Claims for Energy

Consuming a diet high in Calories does not guarantee that one will have lots of “pep” and “energy”. Many factors, including the state of a person’s health and physical fitness, impact upon how effectively and efficiently the muscles use the energy. The popular concept of “energy” in the sense of being energetic, having pep, vigour, strength, endurance, etc., is not directly related to specific foods in the diet.

The text accompanying claims such as “source of energy” and “contains more calories” (and synonymous claims) must not mislead the buyer. The following types of claims are considered misleading and must **not** be used.

- a claim that a food provides “instant” pep, vitality, vigour, power or strength;
- a claim that a food provides all the food energy necessary to carry one through certain physical activities or recovery from these;
- a claim that a food provides all the energy necessary to carry one through until the next meal; or
- a claim that a food, consisting mainly of carbohydrates, provides food energy which lasts over many hours of hard work or play.

Summary Table of Energy and Calorie Claims
Table 7-3

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
a) Free of energy "free of energy" "energy-free" "no energy" "0 energy" "zero energy" "without energy" "contains no energy" "Calorie-free" "free of Calories" "no Calories" "0 Calories" "zero Calories" "without Calories" "contains no Calories"	The food provides less than 5 Calories or 21 kilojoules per reference amount and serving of stated size.	Must comply with general requirements for nutrient content claims - see 7.5 of this <i>Guide</i> Nutrition Facts table required on products otherwise exempted by <i>FDR</i> B.01.401(2)(a) and (b) When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i>	B.01.401(3) (e)(ii) Table following B.01.513, item 1
b) Low in energy "low energy" "low in energy " "low source of energy" "little energy" "low Calorie" "low in Calories" "low source of Calories" "contains only (number) Calories per serving" "contains less than (number) Calories per (size) serving" "few Calories"	The food provides: (a) 40 Calories or 167 kilojoules or less per reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g; or (b) 120 Calories or 500 kilojoules or less per 100 g, if the food is a prepackaged meal.	See conditions set out for item a) of this table.	Table following B.01.513, item 2

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Reduced in Energy "reduced in energy" "reduced energy" "energy-reduced" "less energy" "lower energy" "lower in energy" "reduced Calorie" "reduced in Calories" "Calorie-reduced" "less Calories" "lower Calories" "lower in Calories" "fewer Calories"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified so that it provides at least 25% less energy</p> <p>(a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of item b) above for "low in energy"</p>	<p>The following are identified:</p> <p>(a) the similar reference food;</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in energy value with the similar reference food, expressed by percentage or fraction or in Calories per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 3</p>
<p>d) Lower in Energy "lower in energy" "less energy" "lower energy" "less Calories" "lower Calorie" "lower in Calories" "fewer Calories"</p>	<p>1) The food provides at least 25% less energy</p> <p>(a) per reference amount of the food, than the reference amount of the reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of item b) above for "low in energy".</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in energy value with the reference food of the same food group, expressed by percentage or fraction or in Calories per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 4</p>
<p>e) Source of Energy "source of energy" "contains energy" "provides energy" "source of Calories" "contains Calories" "provides Calories"</p>	<p>The food provides at least 100 Calories or 420 kilojoules per reference amount and serving of stated size.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 5</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>f) More Energy "more Calories" "contains more Calories" "higher Calories" "higher in Calories"</p>	<p>The food provides at least 25% more energy, totalling at least 100 more Calories or 420 more kilojoules</p> <p>(a) per reference amount of the food, than the reference amount of the reference food of the same food group or the similar reference food; or</p> <p>(b) per 100 g, than 100 g of the reference food of the same food group or the similar reference food, if the food is a prepackaged meal.</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group or the similar reference food;</p> <p>(b) the amounts of the food and the reference food of the same food group or the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in energy value compared to the reference food of the same food group or the similar reference food, expressed as a percentage or fraction or in Calories per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 6</p>
<p>g) Light in Energy "light" "lite"</p>	<p>The food meets the conditions set out in column 2 of the subject "reduced in energy" (item (c) of this table)</p>	<p>The following are identified:</p> <p>(a) the similar reference food[†](see note at the end of this table);</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in energy value with the similar reference food, expressed by percentage or fraction or in Calories or grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table to B.01.503, item 45</p>
<p>h) Representation that the food is for use in "energy-reduced" diet with respect to the energy value only of a food</p>	<p>The food meets the conditions set out for one of the following claims: "free of energy" (item a of this table), "low in energy" (item b of this table), "reduced in energy" (Item c of this table), "lower in energy" (item d of this table)</p>	<p>Claim or statement is made in accordance with columns 1 and 3 for items a), b), c) or d) of this table.</p>	<p>B.01.507</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
i) Representation that the food is for "special dietary use" with respect to the energy value of the food	One of the following claims must be made on the label of the product and the conditions for that claim must be respected: "free of energy" (item a of this table), "low in energy" (item b of this table)	Claim or statement is made in accordance with columns 1 and 3 for items a), b), c) or d) of this table.	B.24.003 (1.1)
j) Foods represented as "dietetic" or "diet" with respect to the energy content of the food, including when used in a trade-mark.	Reserved for foods for special dietary use as regulated by B.24.003. In order to label, package, sell or advertise a food as "dietetic" or "diet", or use those words in the brand name, one of the following must be on the label and the conditions for that claim must be met: "free of energy" (item a above), "low in energy" (item b above), "reduced in energy" (item c above), "lower in energy" (item d above)	Claim or statement is made in accordance with columns 1 and 3 for items a), b), c) or d) of this table.	B.24.003(4)

† The similar reference food for foods with a *light in energy* claim, shall have a nutrient value that is representative of foods of that type that have not been processed, formulated, reformulated or otherwise modified in a manner that increases the energy value or the amount of fat [B.01.500.(2)].

7.15 Protein Claims

7.15.1 Representations about Proteins and Amino Acids

Only the claims which are listed below in Table 7-4, *Summary Table of Protein Claims*, are permitted [B.01.305].

A statement with respect to proteins and amino acids is permitted provided a Reasonable Daily Intake (RDI) of the food has a protein rating of 20 or more. See 6.3.1 of this *Guide* for Reasonable Daily Intakes (Schedule K of the *FDR*).

A statement with respect to amino acids, collectively or by name, and quantitative declarations of amino acid content of a food may be made provided the label or the advertisement includes a declaration of the amount of the following essential amino acids contained in the food: histidine, isoleucine, leucine, lysine, methionine, phenylalanine, threonine, tryptophan and valine.

The declaration must

- be expressed in grams per serving of stated size,
- appear in a location on the label other than in the Nutrition Facts table, and
- be presented in both English and French unless otherwise exempted.

Claims such as “source of amino acids”, “source of (naming the amino acid)” or “source of essential amino acids” are **no longer permitted** under the new nutrition labelling regulations.

The above requirements respecting representations about protein or amino acids [B.01.305 (1) and (2)], whether expressed or implied, do not apply to the following [B.01.305 (3)(a) to (k)]:

- a) a formulated liquid diet, a human milk substitute or a food represented as containing a human milk substitute;
- b) foods represented for use in gluten-free diets, protein-restricted diets and low (naming the amino acid) diets;
- c) the word "protein" when it is used as part of the common name of an ingredient in the list of ingredients;
- d) the declaration of amino acids in a list of ingredients;
- e) common names (such as hydrolysed soya protein), which are set out in column 2 of items 7 to 9 of the table to paragraph B.01.010(3)(a), when shown in the list of ingredients;
- f) the common name of single amino acid preparations that may be sold as foods;
- g) statements to the effect that aspartame contains phenylalanine (as required by paragraphs B.01.014(c) and B.01.015(1)(b));
- h) a statement or claim set out in column 4 of the table following B.01.513 respecting the subject "low in protein" set out in column 1 of item 7;
- i) a statement of the amount of protein in the Nutrition Facts table;
- j) a statement of the protein content of foods mentioned in the following sections of the *FDR*:
 - formulated liquid diet [B.24.103(c)] ,
 - meal replacement, nutritional supplement [B.24.202(a)(ii)],
 - food for use in a very low energy diet [B.24.304(b)], or
 - food represented as containing a human milk substitute [B.25.057(1)(a) or B.25.057(2)(c)(i) or (d)(i)] ; or
- k) a statement that a food is not a source of protein.

7.15.2 Other Permitted References to Protein

The Percent (%) Meat Protein declaration is required as part of the common name for meat and poultry meat with added phosphate salts and/or water [B.01.090(2)]. This declaration is a permitted protein declaration [B.01.502.(2)(a)]. However, the presence of this declaration triggers the Nutrition Facts table

on foods otherwise exempt [B.01.401(2)(b)], such as a food sold only in the retail establishment where the product is prepared and processed from its ingredients [B.01.401(3)(e)(ii)].

Summary Table of Protein Claims
Table 7-4

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions Food	Column 3 Conditions Label or Advertisement	FDR Reference
<p>a) Low in protein "low in protein" "low protein" "low source of protein" "contains only (number) g of protein per serving" or "contains less than (number) g of protein per serving"</p>	<p>The food contains no more than 1 g of protein per 100 g of the food.</p>	<p>Must comply with the general requirements for nutrient content claims - see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by <i>FDR</i> B.01.401(2)(a) and (b), [B.01.401(3)(e)(ii)]</p> <p>When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i></p>	<p>Table following B.01.513, item 7</p>
<p>b) Source of protein "source of protein" "contains protein" "good source of protein" "high protein" "high in protein" or "provides protein"</p> <p>Note: Permitted on foods for children under two [B.01.503.(2)]</p>	<p>The food has a protein rating of 20 or more, as determined by official method FO-1, <i>Determination of Protein Rating</i>, October 15, 1981,</p> <p>(a) per reasonable daily intake (see Schedule K, <i>FDR</i>)*, or</p> <p>(b) per 30 g of breakfast cereal combined with 125 mL of milk, if the food is a breakfast cereal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 8</p>
<p>c) Excellent source of protein "excellent source of protein" "very high protein" "very high in protein" or "rich in protein"</p> <p>Note: Permitted on foods for children under two [B.01.503.(2)]</p>	<p>The food has a protein rating of 40 or more, as determined by official method FO-1, <i>Determination of Protein Rating</i>, October 15, 1981,</p> <p>(a) per reasonable daily intake (see Schedule K, <i>FDR</i>)*, or</p> <p>(b) per 30 g of breakfast cereal combined with 125 mL of milk, if the food is a breakfast cereal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 9</p>

Column 1 Claim	Column 2 Conditions Food	Column 3 Conditions Label or Advertisement	FDR Reference
d) More protein "more protein" "higher protein" "higher in protein"	<p>The food</p> <p>(a) has a protein rating of 20 or more, as determined by official method FO-1, <i>Determination of Protein Rating</i>, October 15, 1981,</p> <p>(i) per reasonable daily intake (see Schedule K, FDR)*, or</p> <p>(ii) per 30 g of breakfast cereal combined with 125 mL of milk, if the food is a breakfast cereal;</p> <p>(b) contains at least 25% more protein, totalling at least 7 g more, per reasonable daily intake* than a reference food of the same food group or a similar reference food.</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group or the similar reference food;</p> <p>(b) the amounts of the food and the reference food of the same food group or the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in protein with the reference food of the same food group or the similar reference food, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	Table following B.01.513, item 10

*See 6.3.1 of this *Guide* for the reasonable daily intakes.

7.16 Fat Claims

7.16.1 Permitted Claims for Fat

Criteria for fat claims follow in Table 7-5, *Summary Table of Fat Claims*.

The 2002 revisions to the *FDR* incorporate several changes for fat claims, as described below:

- The claims "100% fat-free", "x% fat-free", "trans fat", and "source of omega-3 (omega-6) polyunsaturates" are now permitted (see details in the tables below). Companies choosing to make such claims are required to fully comply with all requirements of the new *FDR*, including the requirement to include a Nutrition Facts table, as outlined in Chapter 5 of this *Guide*.

Under the former regulations, B.01.306 prohibited references to individual fatty acids. A statement made about omega-3, omega-6 or other named fatty acids, triggers the new regulations, including a Nutrition Facts table.

- Nutrient content claims for monounsaturated fatty acids, polyunsaturated fatty acids and linoleic acid are no longer permitted. However, **quantitative statements** (see 7.5) are permitted for classes of fatty acids [B.01.402(3)(a)] and for individually named fatty acids [B.01.402(3)(b)].

Note that these claims may trigger additional declarations in the Nutrition Facts table. For example, a statement that a food contains “0.2 g DHA per 250 mL serving” would trigger a declaration of the amount of omega-6 polyunsaturated fatty acids, omega-3 polyunsaturated fatty acids and monounsaturated fatty acids (as DHA is an individually named omega-3 fatty acid).

- The use of the term “Light” in nutrient content claims is now restricted to foods that meet either the “reduced in energy” claim (see item c) in Table 7-3 above) or “reduced in fat” claim (see item h) in Table 7-5 below).

Further details are provided in the sections on each of the permitted fatty acid claims, (e.g., see 7.17 for saturated fatty acid claims, 7.18 for *trans* fatty acid claims and 7.19 for omega-3 and omega-6 polyunsaturated fatty acid claims).

The following references are also permitted:

- common names prescribed by the *FDR*, for example: “skim milk” and “low fat cocoa”.
- the percent milk fat or butter fat declaration on dairy products;
- the words “extra-lean ground (naming the species)”, “lean ground (naming the species)”, “medium ground (naming the species)”, and “regular ground (naming the species)”;
- the representation “defatted (naming the food)” (e.g., “defatted cocoa” or “defatted soybeans”);
- representations that characterize the amount of a fatty acid in a vegetable oil, when the name of the fatty acid forms part of the oil’s common name (e.g., “high oleic sunflower oil” or “low linolenic flaxseed oil”); and
- the English representation “lean” with respect to a prepackaged meal represented for use in a weight-reduction diet or a weight-management diet.

Summary Table of Fat Claims
Table 7-5

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
a) Free of fat "free of fat" "fat-free" "no fat" "0 fat" "zero fat" "without fat" "contains no fat" "non-fat"	The food contains: (a) less than 0.5 g of fat per reference amount and serving of stated size; or (b) less than 0.5 g of fat per serving of stated size, if the food is a prepackaged meal.	Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i> Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b) When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i>	B.01.401(3)(e)(ii) Table following B.01.513, item 11

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>b) Low in fat "low in fat" "low fat" "low source of fat" "little fat" "contains only (number) g of fat per serving" "contains less than (number) g of fat per serving"</p>	<p>The food contains:</p> <p>(a) 3 g or less of fat per reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g; or</p> <p>(b) 3 g or less of fat per 100 g and 30% or less of the energy is from fat, if the food is a prepackaged meal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 12</p>
<p>c) Reduced in fat "reduced in fat" "reduced fat" "fat-reduced" "less fat" "lower fat" "lower in fat"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified so that it contains at least 25% less fat</p> <p>(a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in fat" (item (b) of this table).</p>	<p>The following are identified:</p> <p>(a) the similar reference food;</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in fat with the similar reference food, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 13</p>
<p>d) Lower in fat "lower in fat" "lower fat" "less fat"</p>	<p>1) The food contains at least 25% less fat</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of the subject "low in fat" (item (b) of this table).</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in fat with the reference food of the same food group, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 14</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
e) 100% fat free "100% fat-free" "100% free of fat"	The food (a) contains less than 0.5 g of fat per 100 g; (b) contains no added fat; and (c) meets the conditions set out in column 2 of the subject "free of fat" (item (a) of this table).	See conditions set out for item a) of this table.	Table following B.01.513, item 15
f) (Percentage) fat-free "(percentage) fat-free" "(percentage) free of fat"	The food meets the conditions set out in column 2 of the subject "low in fat" (item (b) of this table).	One of the following statements or claims is stated: "low fat" or "low in fat". See conditions set out for item a) of this table.	Table following B.01.513, item 16
g) No added fat "no fat added" "no added fat" "without added fat"	1) The food contains no added fats or oils set out in Division 9, <i>FDR</i> , or added butter or ghee, or ingredients that contain added fats or oils, or butter or ghee. 2) The similar reference food contains added fats or oils set out in Division 9, <i>FDR</i> , or added butter or ghee.	See conditions set out for item a) of this table.	Table following B.01.513, item 17
h) Light in fat "light" "lite"	The food meets the conditions set out in column 2 of the subject "reduced in fat" (item (c) of this table).	The following are identified: (a) the similar reference food [†] (see note at the end of the table); (b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and (c) the difference in fat value with the similar reference food, expressed by percentage or fraction or in Calories or grams per serving of stated size. (See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.) See conditions set out for item a) of this table.	Table following B.01.513, item 45
i) Lean "lean"	The food (a) is meat or poultry that has not been ground, marine or fresh water animals or a product of any of these; and (b) contains 10% or less fat.	See conditions set out for item a) of this table.	Table following B.01.513, item 46

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
j) Extra Lean "extra lean"	The food (a) is meat or poultry that has not been ground, marine or fresh water animals or a product of any of these; and (b) contains 7.5% or less fat.	See conditions set out for item a) of this table.	Table following B.01.513, item 47

† The similar reference food for foods with a "light in fat" claim, shall have a nutrient value that is representative of foods of that type that have not been processed, formulated, reformulated or otherwise modified in a manner that increases the energy value or the amount of fat [B.01.500.(2)].

7.17 Saturated Fatty Acid Claims

The conditions for saturated fatty acid claims are now linked with the *trans* fatty acid content of the food.

Summary Table of Saturated Fatty Acid Claims

Table 7-6

Note: The claims made in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>a) Free of saturated fatty acids "free of saturated fatty acids" "saturated fatty acids-free" "no saturated fatty acids" "0 saturated fatty acids" "zero saturated fatty acids" "without saturated fatty acids"</p> <p>Note: "saturated fatty acids" may be substituted with "saturated fat" or "saturates" in the above claims</p>	<p>The food contains:</p> <p>(a) less than 0.2 g saturated fatty acids and less than 0.2 g <i>trans</i> fatty acids per reference amount and serving of stated size; or</p> <p>(b) less than 0.2 g saturated fatty acids and less than 0.2 g <i>trans</i> fatty acids per serving of stated size, if the food is a prepackaged meal.</p>	<p>Must comply with general requirements for nutrient content claims – see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>B.01.401(3)(e)(ii)</p> <p>Table following B.01.513, item 18</p>
<p>b) Low in saturated fatty acids "low in saturated fatty acids" "low saturated fatty acids" "low source of saturated fatty acids" "little saturated fatty acids" "contains only (number) g of saturated fatty acids per serving" "contains less than (number) g of saturated fatty acids per serving"</p> <p>Note: "saturated fatty acids" may be substituted with "saturated fat" or "saturates" in the above claims</p>	<p>1) The food contains 2 g or less of saturated fatty acids and <i>trans</i> fatty acids combined per</p> <p>(a) reference amount and serving of stated size; or</p> <p>(b) 100 g, if the food is a prepackaged meal.</p> <p>2) The food provides 15% or less energy from the sum of saturated fatty acids and <i>trans</i> fatty acids.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 19</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Reduced in saturated fatty acids "reduced in saturated fatty acids" "reduced saturated fatty acids" "saturated fatty acids-reduced" "less saturated fatty acids" "lower saturated fatty acids" "lower in saturated fatty acids"</p> <p>Note: "saturated fatty acids" may be substituted with "saturated fat" or "saturates" in the above claims</p> <p>"fewer saturated fatty acids" "fewer saturates"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified, without increasing the content of <i>trans</i> fatty acids, so that it contains 25% less saturated fatty acids</p> <p>(a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in saturated fatty acids" (item b) of this table).</p>	<p>The following are identified:</p> <p>(a) the similar reference food;</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in saturated fatty acids with the similar reference food, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 20</p>
<p>d) Lower in saturated fatty acids "less saturated fatty acids" "lower saturated fatty acids" "lower in saturated fatty acids" "fewer saturated fatty acids"</p> <p>"less saturated fat" "lower saturated fat" "lower in saturated fat"</p> <p>"less saturates" "lower saturates" "lower in saturates" "fewer saturates"</p>	<p>1) The food contains at least 25% less saturated fatty acids and the content of <i>trans</i> fatty acids is not higher</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of the subject "low in saturated fatty acids" (item (b) of this table).</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in saturated fatty acids with the reference food of the same food group, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 21</p>

7.18 Trans Fatty Acid Claims

Due to the adverse effects that *trans* fatty acids have on heart disease, the amended regulations allow claims on the content of these fatty acids in foods. Note that claims for *trans* fatty acids are linked with requirements for the saturated fatty acids content of foods.

If these new claims for *trans* fatty acids are made, the label of that food must comply with all of the requirements of the new regulations and must include a Nutrition Facts table [Section 38 of the amending Regulations].

Note: Only the claims listed in the table below are permitted. Claims such as “Low in *trans*” are not permitted.

Summary Table of *Trans* Fatty Acid Claims
Table 7- 7

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>a) Free of <i>trans</i> fatty acids "free of <i>trans</i> fatty acids" "<i>trans</i> fatty acids-free" "no <i>trans</i> fatty acids" "0 <i>trans</i> fatty acids" "zero <i>trans</i> fatty acids" "without <i>trans</i> fatty acids"</p> <p>Note: "<i>trans</i> fatty acids" may be substituted with "<i>trans</i> fat" or "<i>trans</i>" in the above claims</p> <p>"contains no <i>trans</i> fatty acids" "contains no <i>trans</i> fat"</p>	<p>The food</p> <p>(a) contains less than 0.2 g of <i>trans</i> fatty acids per</p> <p>(i) reference amount and serving of stated size, or</p> <p>(ii) serving of stated size, if the food is a prepackaged meal; and</p> <p>(b) meets the conditions set out in column 2 of the subject "low in saturated fatty acids" (item b) of Table 7-6 in this chapter).</p>	<p>Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b), [B.01.401(3)(e)(ii)]</p> <p>When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i></p>	<p>Table following B.01.513, item 22</p>
<p>b) Reduced in <i>trans</i> fatty acids "reduced in <i>trans</i> fatty acids" "reduced <i>trans</i> fatty acids" "<i>trans</i> fatty acids-reduced"</p> <p>Note: "<i>trans</i> fatty acids" may be substituted with "<i>trans</i> fat" or "<i>trans</i>" in the above claims</p> <p>"less <i>trans</i> fatty acids" "less <i>trans</i> fat" "lower <i>trans</i> fatty acids" "lower <i>trans</i> fat" "lower in <i>trans</i> fatty acids" "lower in <i>trans</i> fat" "fewer <i>trans</i> fatty acids"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified, without increasing the content of saturated fatty acids, so that it contains at least 25% less <i>trans</i> fatty acids</p> <p>(a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in saturated fatty acids" (item (b) of Table 7-6 in this chapter).</p>	<p>The following are identified:</p> <p>(a) the similar reference food;</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in <i>trans</i> fatty acids with the similar reference food, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 23</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Lower in <i>trans</i> fatty acids "lower in <i>trans</i> fatty acids" "lower <i>trans</i> fatty acids" "less <i>trans</i> fatty acids"</p> <p>Note: "<i>trans</i> fatty acids" may be substituted with "<i>trans</i> fat" or "<i>trans</i>" in the above claims</p> <p>"fewer <i>trans</i> fatty acids"</p>	<p>1) The food contains at least 25% less <i>trans</i> fatty acids and the content of saturated fatty acids is not higher</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of the subject "low in saturated fatty acids" (item (b) of Table 7-6 in this chapter).</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in <i>trans</i> fatty acids compared to the reference food of the same food group, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.9 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 24</p>

7.19 Omega-3 and Omega-6 Polyunsaturated Fatty Acid Claims

Nutrient content claims are no longer permitted for total polyunsaturates or monounsaturates, nor may claims be made about individual fatty acids such as linoleic acid. Only the claims listed in Table 7-8 below may be made. However, **quantitative** statements for fatty acids are permitted, such as "5 g of polyunsaturated fatty acids per serving of 100 g". **Note** that the use of quantitative statements may trigger a Nutrition Facts table on the label of a food exempted under B.01.401(2) (a) and (b) or additional information requirements for the Nutrition Facts table if one is already required to be shown. Declaration of either omega-3 or omega-6 polyunsaturates in the Nutrition Facts table triggers the mandatory declaration of omega-3 and omega-6 polyunsaturates and monounsaturates.

If the new claims for omega-3 and omega-6 polyunsaturated fatty acids listed in Table 7-8 are made, then the label of that food must comply with all of the requirements of the new regulations, and must include a Nutrition Facts table [Section 38 of the amending Regulations].

7.19.1 Quantitative Statements for Omega-3 or Omega-6 Fatty Acids

If a quantitative statement is made about a group of fatty acids (e.g. omega-3 polyunsaturates) or individual fatty acids (e.g. DHA or linoleic acid), the quantitative statement may appear as a separate statement such as "0.1 g of omega-3 polyunsaturates", but the full disclosure of the monounsaturated, omega-3 and omega-6 polyunsaturated fatty acid content must appear in the Nutrition Facts table. This also applies to the omega-6 polyunsaturates content.

Summary Table of Omega-3 and Omega-6 Polyunsaturates Claims
Table 7-8

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>a) Source of omega-3 polyunsaturated fatty acids "source of omega-3 polyunsaturated fatty acids" "contains omega-3 polyunsaturated fatty acids" "provides omega-3 polyunsaturated fatty acids" Note: "polyunsaturated fatty acids" may be substituted with "polyunsaturated fat" or "polyunsaturates" in the above claims</p>	<p>The food contains: (a) 0.3 g or more of omega-3 polyunsaturated fatty acids per reference amount and serving of stated size; or (b) 0.3 g or more of omega-3 polyunsaturated fatty acids per 100 g, if the food is a prepackaged meal.</p>	<p>Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i> Nutrition Facts table must include a declaration of omega-3 polyunsaturated fatty acids, omega-6 polyunsaturated fatty acids, and monounsaturated fatty acids Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b) When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>[B.01.402 (3) and (4) [B.01.401(3)(e)(ii) Table following B.01.513, item 25</p>
<p>b) Source of omega-6 polyunsaturated fatty acids "source of omega-6 polyunsaturated fatty acids" "contains omega-6 polyunsaturated fatty acids" "provides omega-6 polyunsaturated fatty acids" Note: "polyunsaturated fatty acids" may be substituted with "polyunsaturated fat" or "polyunsaturates" in the above claims</p>	<p>The food contains: (a) 2 g or more of omega-6 polyunsaturated fatty acids per reference amount and serving of stated size; or (b) 2 g or more of omega-6 polyunsaturated fatty acids per 100 g, if the food is a prepackaged meal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 26</p>

7.20 Cholesterol Claims

Cholesterol claims are now linked with the *trans* fatty acid content and the saturated fatty acid content of foods.

Summary Table of Cholesterol Claims
Table 7-9

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M (*FDR*), see 6.2.1 of this *Guide*.

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>a) Free of Cholesterol "free of cholesterol" "cholesterol-free" "no cholesterol" "0 cholesterol" "zero cholesterol" "without cholesterol" "contains no cholesterol"</p>	<p>The food</p> <p>(a) contains less than 2 mg of cholesterol</p> <p>(i) per reference amount and serving of stated size, or</p> <p>(ii) per serving of stated size, if the food is a prepackaged meal; and</p> <p>(b) meets the conditions set out in column 2 of the subject "low in saturated fatty acids" (item (b) of Table 7-6 in this <i>Guide</i>).</p>	<p>Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>B.01.401 (3)(e)(ii)</p> <p>Table following B.01.513, item 27</p>
<p>b) Low in cholesterol "low in cholesterol" "low cholesterol" "low source of cholesterol" "little cholesterol" "contains only (number) mg of cholesterol per serving" "contains less than (number) mg of cholesterol per serving"</p>	<p>The food</p> <p>(a) contains 20 mg or less of cholesterol per</p> <p>(i) reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g, or</p> <p>(ii) per 100 g, if the food is a prepackaged meal; and</p> <p>(b) meets the conditions set out in column 2 of the subject "low in saturated fatty acids" (item (b) of Table 7-6 in this <i>Guide</i>).</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 28</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Reduced in Cholesterol "reduced in cholesterol" "reduced cholesterol" "cholesterol-reduced" "less cholesterol" "lower cholesterol" "lower in cholesterol"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified so that it contains at least 25% less cholesterol</p> <p>(a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in cholesterol" (item (b) of this table).</p> <p>3) The food meets the conditions set out in column 2 of the subject "low in saturated fatty acids" (item b) of Table 7-6 in this <i>Guide</i>).</p>	<p>The following are identified:</p> <p>(a) the similar reference food;</p> <p>(b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in cholesterol with the similar reference food, expressed by percentage or fraction or in milligrams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 29</p>
<p>d) Lower in Cholesterol "lower in cholesterol" "lower cholesterol" "less cholesterol"</p>	<p>1) The food contains at least 25% less cholesterol</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of the subject "low in cholesterol" (item (b) of this table).</p> <p>3) The food meets the conditions set out in column 2 of the subject "low in saturated fatty acids" (item b) of Table 7-6 in <i>Guide</i>).</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in cholesterol with the reference food of the same food group, expressed by percentage or fraction or in milligrams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 30</p>

7.21 Sodium (Salt) Claims

Table 7-10 provides a *Summary Table for Sodium (Salt) Claims*.

Note: The claim "very low sodium" is **not permitted** on foods sold in Canada.

7.21.1 Salted

Reference to the addition of salt to a food is not considered to be a nutrient content claim. The word "salted", or a synonymous term, used to indicate that salt has been added (either as part of the common

name or as a separate claim: e.g., “extra salt”, “salt water taffy”, “salt cod”, “salted peanuts”), does not trigger the declaration of the Nutrition Facts table for foods exempted by B.01.402. Similarly, the representation “light salted” can be made on fish without triggering the Nutrition Facts table on exempted foods.

In addition, a reference to a “salty taste” is considered a taste claim and does not trigger the Nutrition Facts table on foods otherwise exempted under B.01.401(2).

7.21.2 Sodium Claims on Foods that Contain Added Potassium Salts

When the sodium claims in the table below are made on the label of a food (or in an advertisement for the food placed by or on the direction of the manufacturer) that contains added potassium salts, the potassium content per serving of stated size must be declared in the Nutrition Facts table. This includes any form of potassium salts, including food additives.

7.21.3 Ingredients that Functionally Substitute for Salt

The “no added sodium or salt” claim outlined in item e) of Table 7-10 below specifies that the food contains “no added salt, other sodium salts or **ingredients that contain sodium that functionally substitute for added salt**”. These include ingredients which give a salty taste to foods such as hydrolyzed vegetable proteins, soy sauce, bouillon powder or cubes, soup mix, etc.

7.21.4 “Sodium-free” Claim on Bottled Water

Note that a claim such as “sodium-free” triggers the Nutrition Facts table on a bottled water (that might otherwise be exempted under B.01.401(2)(a), inasmuch as the information set out in the table to B.01.401 may be expressed as zero in the Nutrition Facts table).

Also note that a Nutrition Facts table is required when a bottled water contains 5 mg or more of sodium per serving. Applicable rounding rules state that the amount of sodium must be rounded to the nearest multiple of 5 mg when the amount is 5 mg or more (and not more than 140 mg). A Nutrition Facts table is not required when the information in the Nutrition Facts table, with the exception of the serving size, may be expressed as zero, i.e., if the amount of sodium is zero or can be rounded down to zero according to the rounding rules.

Summary Table for Sodium (Salt) Claims
Table 7-10

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M (*FDR*), see Chapter 6.

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	<i>FDR</i> Reference
<p>a) Free of sodium or salt "free of sodium" "sodium-free" "no sodium" "0 sodium" "zero sodium" "without sodium" "contains no sodium" "free of salt" "salt-free" "no salt" "0 salt" "zero salt" "without salt" "contains no salt"</p>	<p>The food contains:</p> <p>a) less than 5 mg of sodium per reference amount and serving of stated size; or</p> <p>b) less than 5 mg of sodium or salt per serving of stated size, if the food is a prepackaged meal</p>	<p>Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by <i>FDR</i> B.01.401(2) (a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>B.01.401(3) (e)(ii)</p> <p>Table following B.01.513, item 31</p>
<p>b) Low in sodium or salt "low in sodium" "low sodium" "low source of sodium" "little sodium" "contains only (number) mg of sodium per serving" "contains less than (number) mg of sodium per serving" "low salt" "low in salt" "low source of salt" "little salt" "contains only (number) mg of salt per serving" "contains less than (number) mg of salt per serving"</p>	<p>The food contains:</p> <p>a) 140 mg or less of sodium per reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g; or</p> <p>b) 140 mg or less of sodium per 100 g, if the food is a prepackaged meal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 32</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Reduced in sodium or salt "reduced in sodium" "reduced sodium" "sodium-reduced" "less sodium" "lower in sodium" "reduced in salt" "reduced salt" "salt-reduced" "less salt" "lower salt" "lower in salt"</p>	<p>1) The food is processed, formulated, reformulated or otherwise modified so that it contains at least 25% less sodium</p> <p>a) per reference amount of the food, than the reference amount of a similar reference food; or</p> <p>b) per 100 g of a similar reference food, if the food is a prepackaged meal.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in sodium or salt" set out in item b) of this table.</p>	<p>The following are identified:</p> <p>a) the similar reference food;</p> <p>b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>c) the difference in sodium content with the similar reference food, expressed by percentage or fraction or in milligrams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>Nutrition Facts table must also include the amount of potassium per serving if the food contains added potassium salts.</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 33</p>
<p>d) Lower in sodium or salt "lower in sodium" "less sodium" "lower sodium" "lower in salt" "less salt" "lower salt"</p>	<p>1) The food contains at least 25% less sodium</p> <p>a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p> <p>2) The reference food of the same food group does not meet the conditions set out in column 2 of the subject "low in sodium or salt" set out in item b) of this table.</p>	<p>The following are identified:</p> <p>a) the reference food of the same food group;</p> <p>b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>c) the difference in sodium content with the reference food of the same food group, expressed by percentage or fraction or in milligrams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>Nutrition Facts table must also include the amount of potassium per serving if the food contains added potassium salts.</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 34</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>e) No added sodium or salt "no added sodium" "without added sodium" "no sodium added" "no added salt" "without added salt" "no salt added" "unsalted"</p> <p>May be used on foods intended solely for children less than two years of age [FDR B.01.503(2)(d)]</p>	<p>1) The food contains no added salt, other sodium salts or ingredients that contain sodium that functionally substitute for added salt.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in sodium or salt" set out in item b) of this table and contains added salt or other sodium salts.</p> <p>For the definition of similar reference food see 7.9.2 of this <i>Guide</i>.</p>	<p>Nutrition Facts table must also include the amount of potassium per serving if the food contains added potassium salts.</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 35</p> <p>B.01.500</p>
<p>f) Lightly salted "lightly salted" "salted lightly"</p>	<p>1) The food contains at least 50% less sodium added than the sodium added to the similar reference food.</p> <p>2) The similar reference food does not meet the conditions set out in column 2 of the subject "low in sodium or salt" set out in item b) of this table.</p>	<p>The following are identified:</p> <p>a) the similar reference food;</p> <p>b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and</p> <p>c) the difference in sodium content with the similar reference food, expressed by percentage or fraction or in milligrams per serving of stated size.</p> <p>(See 7.9 and 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 36</p>
<p>g) Words to the effect that the food is "for use in a sodium-restricted diet"</p>	<p>The food meets the conditions set out for one of the following claims:</p> <p>"free of sodium or salt" (item a) above), "low in sodium or salt" (item b) above), "reduced in sodium or salt" (item c) above), or "lower in sodium or salt" (item d) above).</p>	<p>Claim or statement is made in accordance with column 1 and column 3 for items a), b), c) or d) of this table</p> <p>See conditions set out for item a) of this table.</p>	<p>B.01.508, table following B.01.513, items 31 to 34</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
h) Words to the effect that the food is "for special dietary use" with respect to the sodium (salt) content	The food meets the conditions set out for one of the following claims: "free of sodium or salt" (item a) above), "low in sodium or salt" (item b) above).	Claim or statement is made in accordance with column 1 and column 3 for items a) or b) of this table See conditions set out for item a) of this table.	B.24.003. (1.1), and the table following B.01.513, items 31 to 34

7.22 Potassium Claims

Claims for potassium were not specifically addressed in the 2002 *FDR* amendments regarding nutrient content claims. Companies may continue to make claims for potassium as outlined below.

**Summary Table of Potassium Claims
Table 7-11**

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
a) "source of potassium" "contains potassium"	At least 200 mg per serving of stated size	Nutrition Facts table must include the amount of potassium per serving. Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b)	B.01.402 (4) B.01.401(3) (e)(i)
b) "good source of potassium" "high in potassium"	At least 350 mg per serving of stated size	See conditions set out for item a) of this table.	B.01.402 (4) B.01.401(3) (e)(i)
c) "excellent source of potassium" "very high in potassium"	At least 550 mg per serving of stated size	See conditions set out for item a) of this table.	B.01.402 (4) B.01.401(3) (e)(i)

7.23 Carbohydrate and Sugars Claims

Claims for carbohydrate and sugars content are now restricted to those permitted in Table 7-12 below. Claims such as "source of complex carbohydrates", "low carbohydrate", and "light" claims referring to the carbohydrate or sugar content of a food are **no longer permitted**

7.23.1 Other Permitted Representations [B.01.502(2)]

In addition to the claims permitted in the table following B.01.513, representations with respect to sugars and carbohydrates may also be made as follows:

- Representations otherwise provided for in the *FDR* are permitted, such as prescribed common

names like “semi-sweet”, “bitter-sweet”, “sweetened and unsweetened chocolate” and “sweetened condensed milk”.

- Representations provided for under Section 35 of the *Processed Products Regulations* are permitted. These require the indication of the type of syrup or juice in which various fruits and sweet potatoes are packed (i.e., heavy syrup, slightly sweetened fruit juice, etc), and the total percentage of sweetening agents added for frozen fruits packed in sugar (i.e., “X% sugar”, “invert sugar”, “dextrose or glucose added”).
- Representations characterizing the amount of lactose in a food are permitted. These are not considered to be nutrient content claims.
- Representations characterizing the addition of sugars to a food, such as “sweetened ice tea”, “sweetened with honey”, and “sweetened with fruit juice”, are permitted, in addition to the statements or claims prescribed by the nutrition labelling regulations.
- Representations characterizing the amount of starch in a food, such as “no added starch”, are permitted, if the food is intended solely for children under two years of age.
- The representation “high (naming the mono- or disaccharide) (naming the syrup)” are permitted.

7.23.2 Ingredients that Functionally Substitute for Added Sugars

The statement “no sugar added, sweetened with (naming the sweetening agent(s))” is no longer permitted on labels for foods that contain **added sugars* or ingredients with added sugars or ingredients that contain sugars that functionally substitute for added sugars**. These ingredients, such as sweetening agents, molasses, fruit juice, honey and maple syrup give a sweet taste to foods. These foods will not meet the prescribed requirements for the “no sugar added” claim. See item d) in Table 7-12 below.

*Note: The term “sugars” means all mono- and disaccharides, including sucrose, fructose, glucose, glucose-fructose, maltose, etc.

7.23.3 Addition of Sugar Alcohols

When sugar alcohols or polyols such as sorbitol, xylitol, maltitol, etc. are added to a food, their amount must be declared in the Nutrition Facts table. A simple declaration in the ingredient list is no longer sufficient. (See Chapter 5 in this *Guide*: 5.4.1, 5.4.2 and 5.4.3.) A positive statement such as “sweetened with sorbitol” is acceptable on the label or in the advertisement in addition to the declaration of the amount in the Nutrition Facts table.

7.23.4 Sweet Taste

A claim referring specifically to a “**sweet taste**”, such as “**does not taste sweet**”, is considered to be a taste claim and does not trigger a Nutrition Facts table on foods otherwise exempted by B.01.401(2)(a) and (b).

Summary Table for Carbohydrate and Sugars Claims
Table 7-12

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M of the *Food and Drug Regulations* (see 6.2.1 of this *Guide*).

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
a) Free of sugars "free of sugar" "sugar-free" "no sugar" "0 sugar" "zero sugar" "without sugar" "contains no sugar" "sugarless"	The food (a) contains less than 0.5 g of sugars per reference amount and serving of stated size; and (b) with the exception of chewing gum, meets the conditions set out in column 2 of the subject "free of energy" set out in item a) of the table in 7.14.	Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i> Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b) When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i>	B.01.401(3) (e)(ii) Table following B.01.513, item 37
b) Reduced in sugars "reduced in sugar" "reduced sugar" "sugar-reduced" "less sugar" "lower sugar" "lower in sugar"	The food is processed, formulated, reformulated or otherwise modified so that it contains at least 25% less sugars, totalling at least 5 g less (a) per reference amount of the food, than the reference amount of a similar reference food; or (b) per 100 g, than 100 g of a similar reference food, if the food is a prepackaged meal.	The following are identified: (a) the similar reference food; (b) the amounts of the food and the similar reference food being compared, if those amounts are not equal; and (c) the difference in sugars with the similar reference food, expressed by percentage or fraction or in grams per serving of stated size. (See 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.) See conditions set out for item a) of this table.	Table following B.01.513, item 38

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>c) Lower in sugars "lower in sugar" "lower sugar" "less sugar"</p>	<p>The food contains at least 25% less sugars, totalling at least 5 g less,</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group, if the food is a prepackaged meal.</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group;</p> <p>(b) the amounts of the food and the reference food of the same food group being compared, if those amounts are not equal; and</p> <p>(c) the difference in sugars with the reference food of the same food group, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 39</p>
<p>d) No added sugars "no added sugar" "no sugar added" "without added sugar"</p> <p>May be used on foods intended solely for children less than two years of age [B.01.503.(2)(e) <i>FDR</i>]</p>	<p>1) The food contains no added sugars and no ingredients containing added sugars or ingredients that contain sugars that functionally substitute for added sugars.</p> <p>2) The sugars content is not increased through some other means except where the functional effect is not to increase the sugars content of the food.</p> <p>3) The similar reference food contains added sugars.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 40</p>
<p>e) "unsweetened"</p>	<p>1) The food meets the conditions set out in column 2 for item d) of this table - "No added sugars".</p> <p>2) The food does not contain a sweetener set out in column 1 of Table IX to B.16.100 <i>FDR</i>.</p>	<p>See conditions set out for item a) of this table.</p>	<p>B.01.509</p>
<p>f) Representation that the food is for use in an energy-reduced diet</p> <p>Conditions for use with energy claims, see table 7-3 of this <i>Guide</i>.</p>	<p>The food meets the conditions set out for the claim "free of sugars" (item (a) above in this table).</p>	<p>Claim or statement is made in accordance with Columns 1 and 3 for item a) of this table.</p>	<p>B.01.507</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>g) Representation that a food is “for special dietary use” with respect to the sugar content</p> <p>Conditions for use with energy and sodium claims, see Table 7-3 and 7-10 of this <i>Guide</i>.</p>	<p>The food must meet the conditions for “free of sugars” (item (a) above).</p>	<p>Claim or statement is made in accordance with Columns 1 and 3 for item a) of this table.</p>	<p>B.01.401(3) (e)(ii)</p> <p>B.24.003 (1.1)</p>
<p>h) “dietetic” “diet” with respect to the sugars content of the food, including when used in the brand name.</p> <p>Conditions for use with energy and sodium claims - See Table 7-3 and 7-10 of this <i>Guide</i>.</p>	<p>Reserved for foods for special dietary use as regulated by B.24.003</p> <p>The food meets the conditions for the claim “Free of sugars” (see item (a) above)</p>	<p>Claim or statement is made in accordance with Columns 1 and 3 for item (a) of this table.</p>	<p>B.01.401(3) (e)(ii)</p> <p>B.24.003(4)</p>
<p>i) Representation about the addition or non addition of starch to a food</p>	<p>The claim may only be made on foods intended solely for children less than two years of age.</p>	<p>Nutrition Facts table must also comply with the conditions set out in B.01.403 (Foods for children under two years of age)</p> <p>Nutrition Facts table must include the amount of starch expressed in grams per serving of stated size</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>B.01.403</p> <p>B.01.402(4) table, item 13</p>
<p>j) Words that characterize the amount of lactose present in a food</p>	<p>This is not a claim covered by the Regulations.</p> <p>Note: a food claiming to be lactose-free should contain no detectable lactose.</p>	<p>Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b).</p>	<p>B.01.401(3) (e)(ii)</p>
<p>k) “sweetened”, or other claims characterizing the addition of sugars to the food i.e., “Sweetened”, “sweetened with honey”, “sweetened with fruit juice”, etc.</p>	<p>No compositional requirements</p>		

7.24 Dietary Fibre Claims

Note: the spelling “fibre” or “fiber” are both acceptable in the **English** statements or claims [B.01.503(4)].

Comparative claims for dietary fibre may be made under the conditions described for “More fibre” claims in Table 7-13, item d) below. The claims are not restricted to fibre from the same source.

Nutrient content claims for dietary fibre may be made for foods which are considered to be sources of dietary fibre. Both traditional and novel fibre sources may be eligible for fibre claims. The terms “**good**” and “**excellent**”, because they imply a judgment regarding the nature and value of the fibre in addition to quantity, **are not permitted**.

If a food contains a novel fibre source that has not been reviewed by Health Canada, or for which the data does not support the efficacy of the fibre, the amount of fibre contributed by this ingredient must not be included in the declaration of the dietary fibre content, and no fibre claims may be made for it. A list of accepted novel fibre sources is shown in Table 6-12 of this *Guide*.

When the source of bran is not named, the term “**bran**” is considered a reference to **wheat bran**. Wheat bran contains approximately 42 percent dietary fibre.

Oat bran is the product derived from the dehulled oat kernels (oat groat) which provides, on a dry basis, a minimum content of 13 percent total dietary fibre, of which at least 30 percent must be soluble fibre. The moisture content of the product must not exceed 12 percent. A product may be represented as a source of oat bran, provided it contains at least 2 g dietary fibre derived from oat bran per reference amount and serving of stated size.

Traditionally, milled **corn bran** contains 60 to 65 percent dietary fibre. Products may be represented as sources of corn bran, provided the product contains at least 2 g dietary fibre from traditionally-milled corn bran.

No dietary fibre claims may be made for **rice bran**, which is considered a safe food ingredient but whose efficacy as a dietary fibre has not been established.

Summary Table of Permitted Fibre Claims
Table 7-13

Note: The claims in quotation marks in column 1 are those which are permitted by the *Food and Drug Regulations*. The reference amounts are found in Part D, Schedule M (*FDR*), see 6.2.1 of this *Guide*.

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions Label or Advertisement	FDR Reference
<p>a) Source of fibre "source of fibre" "contains fibre" "provides fibre" "made with fibre"</p> <p>Note: in the above claims, "fibre" may be substituted with "(naming the fibre)", "(naming the fibre source)", or "dietary fibre"</p>	<p>1) The food contains 2 g or more of</p> <p>(a) fibre per reference amount and serving of stated size, if no fibre or fibre source is identified in the statement or claim; or</p> <p>(b) each identified fibre or fibre from an identified fibre source per reference amount and serving of stated size, if a fibre or fibre source is identified in the statement or claim.</p> <p>2) The food contains at least one ingredient that meets the condition set out in (1), if the food is a prepackaged meal.</p>	<p>Must comply with the general requirements for nutrient content claims – see 7.5 of this <i>Guide</i></p> <p>Nutrition Facts table required on products otherwise exempted by B.01.401(2) (a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements - see 7.11 of this <i>Guide</i></p>	<p>B.01.401(3)(e)(ii)</p> <p>Table following B.01.513, item 41</p>
<p>b) High source of fibre "high source of fibre" "high fibre" "high in fibre"</p> <p>Note: in the above claims, "fibre" may be substituted with "(naming the fibre)", "(naming the fibre source)", or "dietary fibre"</p>	<p>1) The food contains 4 g or more of</p> <p>(a) fibre per reference amount and serving of stated size, if no fibre or fibre source is identified in the statement or claim; or</p> <p>(b) each identified fibre or fibre from an identified fibre source per reference amount and serving of stated size, if a fibre or fibre source is identified in the statement or claim.</p> <p>2) The food contains at least one ingredient that meets the condition set out in (1), if the food is a prepackaged meal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 42</p>
<p>c) Very high source of fibre "very high source of fibre" "very high fibre" "very high in fibre" "fibre rich" "rich in fibre"</p> <p>Note: in the above claims, "fibre" may be substituted with "(naming the fibre)", "(naming the fibre source)", or "dietary fibre"</p>	<p>1) The food contains 6 g or more of</p> <p>(a) fibre per reference amount and serving of stated size, if no fibre or fibre source is identified in the statement or claim; or</p> <p>(b) each identified fibre or fibre from an identified fibre source per reference amount and serving of stated size, if a fibre or fibre source is identified in the statement or claim.</p> <p>2) The food contains at least one ingredient that meets the condition set out in (1), if the food is a prepackaged meal.</p>	<p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513 item 43</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions Label or Advertisement	FDR Reference
<p>d) More fibre "more fibre" "higher fibre" "higher in fibre"</p> <p>Note: in the above claim, "fibre" may be substituted with "(naming the fibre)", "(naming the fibre source)" or "dietary fibre"</p>	<p>1) The food contains at least:</p> <p>i) 25% more fibre, totalling at least 1 g or more, if no fibre or fibre source is identified in the statement or claim, or</p> <p>ii) 25% more of the identified fibre or fibre from an identified fibre source, totalling at least 1 g or more, if a fibre or fibre source is identified in the statement or claim</p> <p>(a) per reference amount of the food, than the reference amount of a reference food of the same food group or a similar reference food; or</p> <p>(b) per 100 g, than 100 g of a reference food of the same food group or a similar reference food, if the food is a prepackaged meal.</p> <p>2) The food contains at least:</p> <p>(a) 2 g of fibre per reference amount and serving of stated size if no fibre or fibre source is identified in the statement or claim, or of identified fibre or fibre from an identified fibre source per reference amount and serving of stated size if a fibre or fibre source is identified in the statement or claim; or</p> <p>(b) one ingredient that meets the conditions set out in column 2 of the subject "source of fibre" set out in item a) of this table, if the food is a prepackaged meal.</p>	<p>The following are identified:</p> <p>(a) the reference food of the same food group or the similar reference food;</p> <p>(b) the amounts of the food and the reference food of the same food group or the similar reference food being compared, if those amounts are not equal; and</p> <p>(c) the difference in fibre with the reference food of the same food group or the similar reference food, expressed by percentage or fraction or in grams per serving of stated size.</p> <p>(See 7.11 of this <i>Guide</i> for definitions and location of required labelling and advertising information.)</p> <p>See conditions set out for item a) of this table.</p>	<p>Table following B.01.513, item 44</p>

7.25 Vitamin and Mineral Nutrient Claims

A claim may not be made for a vitamin or mineral nutrient unless a serving of the food contains **at least 5%** of the "recommended daily intake" (RDI) [D.01.004, D.02.002]. However, even when a claim cannot be made, the amount of the vitamin or mineral nutrient may be declared in the Nutrition Facts table in an amount less than 5% of the RDI (see 5.4.1, 5.4.2 and 5.4.3 of this *Guide*).

New RDIs Established: Claims may be made only for vitamins or mineral nutrients for which recommended daily intakes (RDIs) have been established [D.01.004(1)(a), D.02.002(1)(a)]. In the amended *Food and Drug Regulations*, RDIs have been added for vitamin K, biotin, selenium, copper, manganese, chromium, molybdenum and chloride, in addition to the existing RDIs for vitamins and minerals.

The term “**Daily Value**” (DV) is synonymous with the “recommended daily intakes” (RDI) for vitamin and mineral nutrients. The RDIs are specified in the tables to D.01.013 and D.02.006 of the *Food and Drug Regulations*, and are summarized in Tables 7-14 and 7-15 below.

The term “Daily Value” or “DV” is now used instead of “RDI” in the Nutrition Facts table. The two terms are equivalent. [B.01.001]

When a vitamin or mineral nutrient is declared in the Nutrition Facts table, the declaration must be made as a percentage of the Daily Value (% DV) per serving of stated size.

Vitamin and mineral nutrient claims were not reviewed with the regulatory change and are not included in the table following B.01.513. However, they may continue to be used as they have been previously, and are listed in Table 7-16 below.

What’s New for Vitamin and Mineral Nutrient Content Claims?

- The term “Daily Value” is now used instead of “RDI” (Recommended Daily Intake) in the Nutrition Facts table. The two terms have the same meaning.
- There are now specific advertising requirements for these claims. (See 7.11.6 of this *Guide*.)
- The term “folic acid” can no longer be used to describe the folate content of a food.
- Recommended Daily Intakes have been added for vitamin K, biotin, selenium, copper, manganese, chromium, molybdenum and chloride.

7.25.1 Other Permitted Statements about Vitamin and Mineral Nutrient Content [D.01.004, D.02.002]

a) Prepackaged Water and Ice [Division 12, *FDR*]

The presence of a common name such as “mineral water” or the presence of information required by Division 12 of the *FDR* does not trigger the Nutrition Facts table [B.01.401.(3)(e)(i)]. As well, the presence of added fluoride to prepackaged water or ice also does not trigger the declaration of fluoride in the Nutrition Facts table [B.01.401.(6)(g)].

Common names such as “demineralized water” are acceptable and do not trigger the Nutrition Facts table [B.01.502(2)(h)].

Note, however, that the mineral ion content of prepackaged water or ice, when declared on the label, must be declared in **parts per million** (ppm) per serving of stated size [B.01.301.(1)(d)].

b) Iodized Table Salt or Iodized Salt for General Household Use [B.17.003]

Salt for table or general household use which contains added iodide does **not** have to declare the iodide content in the Nutrition Facts table [B.01.402(6)], nor does the salt have to contain a minimum of 5% of the RDI for iodide. However, the presence of added iodide must be shown on the principal display panel [B.17.003]. The presence of iodide in table salt or salt for general household use or the indication of the word “iodized” on the principal display panel does not trigger the Nutrition Facts table [B.01.401.(6)(g)].

7.25.2 When Vitamins or Mineral Nutrients are Added Directly or as Components of an Ingredient

When a food has a vitamin or mineral nutrient added directly to it as an ingredient, or when a food contains a vitamin or mineral nutrient that was added via an ingredient **and** the vitamin or mineral nutrient is **declared** as a component of that ingredient (as required by B.01.008), the amount of the vitamin or

Reminder: In order to make a **claim** about the vitamin or mineral nutrient content, the food must contain at least 5% of the RDI per serving of stated size for that vitamin or mineral nutrient.

mineral nutrient must be declared in the Nutrition Facts table. For foods that are otherwise exempt from carrying a Nutrition Facts table, a Nutrition Facts table is now triggered [B.01.401(3)(a)&(b)].

7.25.3 Claims for Vitamin and Mineral Nutrients which are Present in Ingredients Exempted from Component Declaration [D.01.007, D.02.005]

Section B.01.009 *FDR* details a number of ingredients that are partially or fully exempted from component declaration. These ingredients may contain vitamins and/or mineral nutrients as components, as set out in the applicable legislation. The label or advertisement for a food with enriched ingredients may make statements or claims about the vitamin and/or mineral nutrient components of these ingredients, **provided**:

- the vitamin or mineral nutrient is declared by its common name immediately following the declaration of that ingredient to show that it is a component of that ingredient (despite the requirements of B.01.008(6));
- except in the case of flour, all of the components of that ingredient are declared, in parentheses following the name of the ingredient. The components cannot be integrated into the ingredient list as though they are ingredients of the food. (In the case of flour, only the vitamin or mineral nutrient that is the subject of the claim would have to appear in parentheses);
- the total content of the vitamin and/or mineral nutrient(s) in the prepackaged product is declared in accordance with D.01.004 or D.02.005, as applicable; and
- the food contains at least 5% of the RDI per serving of stated size for that vitamin or mineral nutrient.

Example: If a pudding makes a claim that it contains vitamin D in the skim milk ingredient, then all components of the skim milk have to be declared in parentheses following "skim milk" in the list of ingredients. In order to make that claim, the food is required to contain a minimum 5% of the RDI of vitamin D per serving of stated size. Also, the %DV of the added vitamin D and any other vitamin and mineral nutrients would have to be declared in the Nutrition Facts table.

Note: All vitamins and/or mineral nutrients that appear in the list of ingredients due to the requirements of D.01.007 and D.02.005 must also be in the Nutrition Facts table.

Summary Table of Vitamin and Mineral Claims
Table 7-14

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>a) any vitamin or mineral nutrient claim</p> <p>Examples:</p> <p>"contains"</p> <p>"source of"</p> <p>"contains 8 essential nutrients"</p>	<p>The vitamin or mineral must be set out in column 1 of Table I in Division 1, part D for vitamins or Table I in Division 2, part D for minerals.</p> <p>The food provides $\geq 5\%$ of RDI</p> <p>Claims are based on the total nutrient level, with the following exception:</p> <p>where fortification is not permitted and additives contribute 25% or more of the total nutrient level, any claim must only be based upon the naturally occurring nutrient level.</p>	<p>Nutrition Facts table must include a declaration of the % Daily Value of the claimed vitamin or mineral nutrient per serving of stated size.</p> <p>Nutrition Facts table required on products otherwise exempted by B.01.401(2)(a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>D.01.004 D.02.002</p> <p>B.01.402 (4)</p> <p>B.01.401(3)(e)(ii)</p>
<p>b) "good source of"</p> <p>"high in"</p>	<p>The vitamin or mineral must be set out in column 1 of Table 1 in Division 1, part D for vitamins or Table 1 in Division 2, part D for minerals.</p> <p>The food provides $\geq 15\%$ of RDI, except $\geq 30\%$ of RDI for vitamin C</p> <p>Claims are based on the total nutrient level, with the following exception:</p> <p>where fortification is not permitted and additives contribute 25% or more of the total nutrient level, any claim must only be based upon the naturally occurring nutrient level.</p>	<p>See conditions set out for item a) above.</p>	<p>B.01.401(3)(e)(ii)</p>
<p>c) "excellent source of"</p> <p>"very high in"</p> <p>"rich in"</p>	<p>The vitamin or mineral must be set out in column 1 of Table 1 in Division 1, part D for vitamins or Table 1 in Division 2, part D for minerals.</p> <p>The food provides $\geq 25\%$ of RDI, except $\geq 50\%$ of RDI for vitamin C</p> <p>Claims are based on the total nutrient level, with the following exception: where fortification is not permitted and additives contribute 25% or more of the total nutrient level, any claim must only be based upon the naturally occurring nutrient level.</p>	<p>See conditions set out for item a) above.</p>	<p>D.01.004(1)(c) D.02.002(1)(c)</p> <p>B.01.402 (4)</p> <p>B.01.401(3)(e)(ii)</p>

Column 1 Claim	Column 2 Conditions - Food	Column 3 Conditions - Label or Advertisement	FDR Reference
<p>d) "added vitamins"</p> <p>"fortified/enriched with (naming the vitamin or mineral nutrient)"</p> <p>"vitaminized with (naming the vitamin)"</p>	<p>Permitted additions of vitamins and mineral nutrients are listed in D.03.002 (see Annex 7-1).</p> <p>Minimum and maximum amounts to be added are regulated.</p> <p>Claims are based on the total nutrient level, with the following exception: where fortification is not permitted and additives contribute 25% or more of the total nutrient level</p>	<p>See conditions set out for item a) above.</p>	<p>D.01.009 D.01.010 D.01.011 D.02.009 D.01.004(1)(c) D.02.002(1)(c) B.01.402 (4) D.01.005(b) D.02.003(b)</p>
<p>e) "(%, fraction or (named vitamin or mineral nutrient) than (naming reference food))"</p> <p>"higher in (named vitamin and/or mineral nutrients) than ..."</p>	<p>Compared to the reference food, the product must be:</p> <p>a) \geq 25% increased in the claimed vitamin or mineral nutrient; and</p> <p>b) have a significant absolute difference in the vitamin or mineral nutrient content of \geq 10% of the Recommended Daily Intake of the vitamin or mineral nutrient.</p> <p>Claims are based on the total nutrient level, with the following exception: where fortification is not permitted and additives contribute 25% or more of the total nutrient level, any claim must only be based upon the naturally occurring nutrient level.</p>	<p>(The %, fraction or number) more vitamin or mineral nutrient than (naming the reference food) to be either:</p> <p>a) part of, or grouped with, the most prominent claim that the food is higher in a vitamin or mineral nutrient; or</p> <p>b) clearly linked to this statement: i) on the principal display panel when the claim is made on the label; and/or ii) in the advertisement when the claim is made in the advertisement.</p> <p>Nutrition Facts table must include a declaration of the % Daily Value of the claimed vitamin or mineral per serving.</p> <p>Nutrition Facts table required on products otherwise exempted by FDR B.01.401(2)(a) and (b)</p> <p>When used in an advertisement, must comply with the requirements for advertisements – see 7.11 of this <i>Guide</i></p>	<p>D.01.004(1)(c) D.02.002(1)(c) B.01.402 (4)</p> <p>B.01.401(3)(e)(ii)</p>

7.25.4 Claims on Foods for Adults and Children Two Years of Age or Over

**Nutrient Levels for Vitamin / Mineral Claims:
Adults and Children Two Years of Age or Over
Table 7-15**

Use this chart to determine the minimum amount of a nutrient required in order to make a vitamin or mineral claim on foods for adults and children two years of age or older [D.01.004, D.02.002]

CLAIMS FOR ADULTS AND CHILDREN 2 YEARS OF AGE OR OLDER				
	Recommended Daily Intake (RDI)	"a source of" "contains" (≥ 5% RDI)	"a good source of" "high in" (≥ 15% RDI except ≥ 30% RDI for vitamin C)	"excellent source" "very high in" (≥ 25% RDI except ≥ 50% RDI for vitamin C)
VITAMINS				
vitamin A	1000 RE	50 RE	150 RE	250 RE
vitamin D	5 µg	0.25 µg	0.75 µg	1.25 µg
vitamin E	10 mg	0.5 mg	1.5 mg	2.5 mg
vitamin C	60 mg	3.0 mg	18 mg	30 mg
thiamine (vitamin B ₁)	1.3 mg	0.07 mg	0.20 mg	0.33 mg
riboflavin (vitamin B ₂)	1.6 mg	0.08 mg	0.24 mg	0.4 mg
niacin	23 NE	1.15 NE	3.45 NE	5.75 NE
vitamin B ₆	1.8 mg	0.09 mg	0.27 mg	0.45 mg
folacin or folate	220 µg	11 µg	33 µg	55 µg
vitamin B ₁₂	2 µg	0.1 µg	0.3 µg	0.5 µg
pantothenic acid or pantothenate	7 mg	0.35 mg	1.05 mg	1.75 mg
vitamin K	80 µg	4 µg	12 µg	20 µg
biotin	30 µg	1.5 µg	4.5 µg	7.5 µg
MINERAL NUTRIENTS				
calcium	1100 mg	55 mg	165 mg	275 mg
phosphorus	1100 mg	55 mg	165 mg	275 mg
magnesium	250 mg	12.5 mg	37.5 mg	62.5 mg
iron	14 mg	0.7 mg	2.1 mg	3.5 mg
zinc	9 mg	0.45 mg	1.35 mg	2.25 mg
iodine	160 µg	8.0 µg	24 µg	40 µg
selenium	50 µg	50 µg	7.5 µg	12.5 µg
copper	2 mg	0.1 mg	0.3 mg	0.5 mg
manganese	2 mg	0.1 mg	0.3 mg	0.5 mg
chromium	120 µg	6 µg	18 µg	30 µg
molybdenum	75 µg	3.75 µg	11.25 µg	18.75 µg
chloride	3400 mg	170 mg	510 mg	850 mg

µg = micrograms

7.25.5 Claims on Foods for Infants and Children Under Two Years of Age

Nutrient Levels for Vitamin/ Mineral Claims: Children Under Two
Table 7-16

Use this chart to determine the minimum amount of a nutrient required in order to make a vitamin or mineral claim on foods intended solely for children less than two years of age.

CLAIMS FOR INFANTS AND CHILDREN LESS THAN 2 YEARS OF AGE				
	Recommended Daily Intake (RDI)	"a source of" "contains" ($\geq 5\%$ RDI)	"a good source of" "high in" ($\geq 15\%$ RDI except $\geq 30\%$ RDI for vitamin C)	"excellent source" "very high in" ($\geq 25\%$ RDI except $\geq 50\%$ RDI for vitamin C)
VITAMINS				
vitamin A	400 RE	20 RE	60 RE	100 RE
vitamin D	10 μg	0.5 μg	1.5 μg	2.5 μg
vitamin E	3 mg	0.15 mg	0.45 mg	0.75 mg
vitamin C	20 mg	1.0 mg	6.0 mg	10 mg
thiamine (vitamin B ₁)	0.45 mg	0.02 mg	0.08 mg	0.11 mg
riboflavin (vitamin B ₂)	0.55 mg	0.03 mg	0.07 mg	0.14 mg
niacin	8 NE	0.4 NE	1.2 NE	2.0 NE
vitamin B ₆	0.7 mg	0.04 mg	0.11 mg	0.18 mg
folacin or folate	65 μg	3.3 μg	9.8 μg	16.3 μg
vitamin B ₁₂	0.3 μg	0.02 μg	0.05 μg	0.08 μg
pantothenic acid or pantothenate	2 mg	0.1 mg	0.3 mg	0.5 mg
vitamin K	30 μg	1.5 μg	4.5 μg	7.5 μg
biotin	8 μg	0.4 μg	1.2 μg	2.0 μg
MINERAL NUTRIENTS				
calcium	500 mg	25 mg	75 mg	125 mg
phosphorus	500 mg	25 mg	75 mg	125 mg
magnesium	55 mg	2.8 mg	8.3 mg	13.8 mg
iron	7 mg	0.35 mg	1.1 mg	1.8 mg
zinc	4 mg	0.2 mg	0.6 mg	1.0 mg
iodine	55 μg	2.8 μg	8.3 μg	13.8 μg
selenium	15 μg	0.75 μg	2.25 μg	3.75 μg
copper	0.5 mg	0.025 mg	0.075 mg	0.125 mg
manganese	1.2 mg	0.06 mg	0.18 mg	0.3 mg
chromium	12 μg	0.6 μg	1.8 μg	3 μg
molybdenum	15 μg	0.75 μg	2.25 μg	3.75 μg
chloride	1000 mg	50 mg	150 mg	250 mg

μg = micrograms