



INFORMATION LETTER

TO: INTERESTED PARTIES

SUBJECT: Accompanying Documentation for Nutrition Labelling

The following guidelines are provided as an interim measure in response to requests that have been made to the Canadian Food Inspection Agency (CFIA) to allow nutrition information for certain prepackaged products regulated under sections B.01.404 and B.01.405 of the amended *Food and Drug Regulations* (FDR) to be provided to the purchaser through means other than physically accompanying the product when it is delivered.

Sections B.01.404(2) and B.01.405(2), *FDR*, require that written nutrition information accompany each delivery of prepackaged foods exclusively for use as (1) ingredients for further manufacture of other prepackaged products destined for sale at retail to consumers or as (2) ingredients in the preparation of food by a commercial or industrial enterprise or institution (food service), and (3) prepackaged multi-serving ready-to-serve foods intended solely to be served in a commercial or industrial enterprise or institution (food service) respectively.

In the case of foods that are shipped to a purchaser on a continual basis, with no change to the formulation, CFIA would not object to documentation being provided to the purchaser on the basis of the first shipment, without having to provide the information on an ongoing basis provided the purchaser agrees in writing to this arrangement. It is felt that this would lessen the burden of providing repetitive paperwork when companies receive large volumes of the same ingredient on a regular basis or in the case of custom-blended ingredients or recipe specific foods for food service. Any change to the nutrition information as a result of formulation changes or other influences would have to accompany the modified product with its first delivery after the change has occurred. The CFIA suggests that a reference system be set up to ensure a match up between the nutrition information and the incoming material for document control purposes. The purchaser should retain relevant hard copies of the information on file for ingredients that have been used in existing production lots still on the market.

Industry will have to take into account that the nutrition information for certain products may vary significantly when ingredients, such as fats and oils, are substituted for one another in the product formulation. Seasonal variations, storage conditions, and the age of ingredients are some of the other factors that could cause a change in the nutrient values. It is important that up to date information be provided to purchasers to ensure that accurate information is used for calculation purposes to determine the nutrient values of final food products. In the case of foods destined for food service, it is important that health professionals in institutional settings have accurate information for menu planning and to show to consumers upon demand.

When the foods discussed in B.01.404 and B.01.405, *FDR*, are provided to a variety of

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customers on an irregular basis or through distributors, documentation will have to accompany each shipment. The same would be the case where the formulation of the product changes frequently.

In addition to providing the appropriate hard copy of the information with the delivery of a food as outlined above, the additional provision of information to purchasers through alternate means such as electronic data interchange, web sites, electronic mail, facsimile and at the time of contracting, continue to be acceptable.

If the food industry wishes to discuss other viable means of conveying nutrition information to their distributors and customers that meets the needs of not only larger food companies but also small and medium sized enterprises, the CFIA is willing to consider discussions for alternatives.

Further information on the new nutrition labelling requirements can be accessed through the CFIA web site at: <http://www.inspection.gc.ca/english/fssa/labeti/nutrition-pagee.shtml>

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Orriss', written in a cursive style.

Greg Orriss
Director
Bureau of Food Safety and Consumer Protection