Section H
Foods for Use in Manufacturing Other Foods and Multi-Serving, Ready-to-Eat Prepackaged Products

for Use in a Commercial or Industrial Enterprise or Institution

Note:
Table H1 is repeated in the special pull-out section of this Toolkit, Section K – Tools and Templates

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For the purposes of nutrition labelling, there are three classes of foods:

- prepackaged foods for the consumer (including foods for children under two years of age and foods that will be repackaged for retail sale);
- prepackaged foods for use in manufacturing other foods; and
- multiple-serving, ready-to-eat prepackaged products served in a commercial or industrial enterprise or institution.

This section deals with the requirements of the last two classes of food. It identifies the major differences in the presentation of nutrition information for these classes of foods as compared to prepackaged foods for the consumer.

1. Foods for Use in Manufacturing Other Foods
(B.01.404)

When Regulatory Requirements Differ: A Definition

These requirements apply to a **prepackaged** product that is intended for use as an ingredient:
- in the manufacture of other prepackaged products intended for sale to a consumer at the retail level, or
- in the preparation of food by a commercial or industrial enterprise or institution.

There are no nutrition information requirements for foods sold in bulk, e.g., tankers of glucose syrup.

How Nutrition Labelling Requirements Differ

There are several key differences in the regulatory requirements governing the labelling of prepackaged foods for use in manufacturing other foods and prepackaged foods intended for the consumer. The following rules apply to prepackaged foods that are intended to be sold as an ingredient.

Format

- The nutrition information does not have to be in the Nutrition Facts table format. That is, the nutrition information is **not** required to be in a box, nor must it obey the formatting requirements.
- The information may simply list the nutrients and their values.

Nutrient declarations

Nutrients are declared:

- per gram (g) or 100 grams (100 g) if the net quantity is declared by weight or count; and
- per millilitre (ml) or 100 millilitres (100 ml) if the net quantity of the food is declared by volume.

Units of measure

See Table H1, Foods for Use in Manufacturing Other Foods – Vitamin and Mineral Declaration, which may be found at the end of this section.

- Vitamins are declared in the units set out in Table I of Division 1 of Part D of the *Food and Drug Regulations* (e.g., RE, µg, mg, NE).
- Minerals are declared in the units set out in Table I of Division 2 of Part D of the *Food and Drug Regulations* (e.g., mg, µg).
- The information for the other nutrients and energy is declared in absolute units as set out in column 3 to the tables to B.01.401 and B.01.402 (e.g. Calories, g, mg).
- The declaration of % Daily Values may be omitted [B.01.404(3)(c)(iii)].

Precision of nutrient declarations and rounding

- Nutrient declarations ***must not*** be rounded.
- Nutrient declarations are declared as accurately as the analytical methods (lab tests) permit.

Triggering additional information

- The same triggering rules for additional information apply.

Exemptions

- The product exemptions set out B.01.401 do **not** apply to prepackaged foods for use in manufacturing other foods.

Location of nutrition information:

The nutrition information is not required to be affixed to the package but must be conveyed to the purchaser as an accompanying hard copy of the information with the delivery of the food. In addition to sending a hard copy with the shipment, the supplier may also provide the information through alternate means such as electronic data interchange, web sites, electronic mail, or facsimile.

In the case of foods that are shipped to a purchaser on a continual basis, with no change to the formulation, documentation may be 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. 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. It is recommended 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.

2. Multiple-Serving, Ready-to-Eat Prepackaged Products Served in a Commercial or Industrial Enterprise or Institution

When multiple-serving, ready-to-eat prepackaged foods are intended for commercial or industrial enterprises or institutions, nutrition information can be provided differently from information suited to individual consumers. Essentially, the "table" format is not required, and nutrition information may simply accompany the product. The same rules for provision of information that apply to Foods for Use in Manufacturing Other Foods apply to these foods. (See *Foods for Use in Manufacturing Other Foods*, *Location of nutrition information* for further details.) However, all the information required for prepackaged products for the consumer must also be provided for these products in the same units of measure. In addition, the same serving size requirements apply to these products, i.e., consumer friendly measure and metric measure.

Prepackaged Foods for Commercial or Industrial Enterprises or Institutions

- A "table" format is not required
- Information requirements are the same as for consumer packaged products (e.g., serving size (consumer friendly measure and metric measure), nutrient declarations, units of measure, rounding values)
- Information may appear on the label or may accompany the product

Table H1: Foods for Use in Manufacturing Other Foods – Vitamin and Mineral Declarations

Vitamin	Unit	Mineral	Unit
Vitamin A	RE	Calcium	mg
Vitamin D	μg	Phosphorus	mg
Vitamin E	mg	Magnesium	mg
Vitamin C	mg	Iron	mg
Thiamin, Thiamine, or Vitamin B_1	mg	Zinc	mg
Riboflavin or Vitamin B_2	mg	Iodide	μg
Niacin	NE	Selenium	μg
Vitamin B_6	mg	Copper	mg
Folacin or Folate	μg	Manganese	mg
Vitamin B_{12}	μg	Chromium	μg
Pantothenic acid or pantothenate	mg	Molybdenum	μg
Vitamin K	μg	Chloride	mg
Biotin	μg		

mg = milligrams
μg = micrograms
NE = niacin equivalents
RE = retinol equivalents

Canadian Food Inspection Agency
Food Safety Directorate
Bureau of Food Safety and Consumer Protection
Fair Labelling Practices Program

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 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,

Greg Orriss
Director
Bureau of Food Safety and Consumer Protection