

Food Labels Made Easy

by Eileen Kotowich & Karen Goad

Labelling food products is probably one of the most contentious issues facing farmers' market vendors and on-farm retailers. There are so many common misconceptions about food labelling that sometimes it's difficult to know what to do and what not to do. Bill Zurawell with the Canadian Food Inspection Agency shed some light on the food labelling issue for farm direct marketers attending the spring Step It Up conference.

Misconception #1: Products sold at farmers' markets are exempt from labelling requirements.

No products are exempt from federal labelling requirements. All vendors must label food products as described in the *Consumer Packaging and Labelling Act* and the *Food and Drug Act* Food Regulation.

Misconception #2: Having an ingredient list available is acceptable.

This misconception shows just how important it is to know the full story. Check the requirements with all regulatory agencies, not just the ones with which you are most familiar. Some public health inspectors tell market managers and vendors that having an ingredient list at the vendor's table is acceptable. From the public health perspective that may be a requirement, however, the *Consumer Packaging and Labelling Act* is federal legislation and supersedes the jurisdiction of the local public health inspector. Labels which include a complete ingredient listing must be attached to each food product sold. The ingredients must be listed in descending order of proportion.

Other information that must appear on a food label includes:

1. Common name
2. Net quantity
3. Dealer identity and principal place of business
4. List of ingredients in descending order of proportion
5. Durable life date if product has shelf life of 90 days or less
6. Allergen labelling
7. Nutrition labelling - unless exempt
8. Bilingual labelling – unless exempt

Before you create any food label refer to the 2003 Guide to Food Labelling and Advertising: <http://www.inspection.gc.ca/english/fssa/labeti/guide/toce.shtml>

Specific chapters to refer to are:

Chapter 2: Basic Labelling Requirements

Chapter 4: Composition, Quality, Quantity, and Origin Claims and
Section 4.19: Product of Canada, Made in Canada

Chapter 5: Nutrition Labelling

Chapter 7: Nutrient Content Claims

Chapter 8: Diet-Related Health Claims

Misconception #3: Products sold at farmers' markets or farm direct are exempt from nutrition labelling.

Foods that are sold **only** at a roadside stand, craft show, flea market, fair, farmers' market or sugar bush by the individual who prepared and processed the product are exempt from nutrition labelling. The exemption does not apply and a Nutrition Facts table is required when:

- A vitamin or mineral nutrient is added to the product or is declared as a component of an ingredient
- Labels or advertisements carry a nutritional reference or nutrient content claim, a biological role claim, a health claim, or the phrase "nutrition facts"
- The product is ground meat, ground meat by-product, ground poultry meat or ground poultry meat by-product

Misconception #4: I can make verbal statements about the health benefits of my product.

Please don't unless you have the research to back it up. A verbal statement is treated the same as a written statement. If you don't have the science to back up the claim or the permission to make the claim, you can not make either verbal or written health claims about your products.

Labels do not have to be professionally created or cost a lot of money. They can be done on a home computer but they must contain all the required information. As the vendor it is your responsibility to ensure full compliance with the legislation.

The *Consumer Packaging and Labelling Act* is enforced by the Canadian Food Inspection Agency. Any questions regarding labelling should be directed to the Canadian Food Inspection Agency's Fair Labelling Practices Program. Contact the Alberta North office in Edmonton at (780) 495-7023.

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