A beverage containing 1.1% or more alcohol by volume is considered an alcoholic beverage and must meet the labeling and compositional requirements found in Division 2 of the Food and Drug Regulations. Principal Display Panel (P.D.P.) is part of the label facing the consumer at point of sale. The following is a summary of the label requirements by product categories:

WINE *For products that meet the Standard of Identity for wine as per the Food & Drug Regulations Division 2*

FRONT

The Vineyard

Wine / Vin

Product of Canada
Produit du Canada

750 mL   12.5% alc./vol.

Vignette and product brand name are optional but must not be misleading or imply irresponsible use o product when used.

Common Name declaration must be bilingual. Names of varietals are not acceptable as common names. It is permissible to use an adjective (eg. Red wine/vin rouge). Minimum height requirement is 1.6 mm based on the lower case "o".

Country of Origin A bilingual county of origin declaration is required at a minimum height of 1.6 mm. Wines produced in Canada from imported grapes or juice cannot be declared as Canadian. See Product Specific Information for wine on the CFIA website for acceptable declarations.

Net Quantity The minimum size of numerical characters varies with surface area of container. The minimum size for a 750 ml or 1.5L is 3.2 mm. See Safe Foods for Canadians Regulations, Schedule 6 for other container sizes. Volume under 1 litre must be in mL, Volumes one Litre and over must be in litres (L). minimum size of mL or L is 1.6 mm, based on the lower case "m".

Alcohol Strength This is the bilingual format for alcohol declaration. The smallest letter must be at least 1.6 mm in height.

Single Field of Vision Common name, net quantity, alcohol strength and country of origin must be visible in a single field of vision (not split between the front and back labels.) These mandatory items can either be together on the back of front label.

BACK

Contains: Sulphites, Egg
Contient: Sulfites, Oeug

Additional Copy

00000 000 0000000 00000

PRODUCED BY/PRODUIT PAR:

Company, City, Provincce/
State, Country

L1234

Allergen declaration is required for wines. Most common allergen In wine is added sulphites. Declaration of an allergenic fining agent (e.g. fish, egg, milk, is required if the wine contains residues od the agents. Flavoured wines and vermouth may have other allergenic ingredients which would require declaration in this statement. The declaration must appear in a box and be black text on a white background. Minimum font height of 1.1mm lower case "o".

Additional Copy Any Copy or statements must not be misleading or imply irresponsible use of product. Not required to be bilingual.

Dealer Name and Address Require name and address of manufacturer or Canadian importer. Importer information must be preceded with "imported for / importe pour". (American importer must be removed or preceded with "In USA imported by".) Must be minimum 1.6 mm in height based on the lower case "o". Country name must be in English or French.

GTIN Bar Code must appear on all consumer selling units, Minimum 80% magnification required. Human readable characters should be on the left (if vertical placement) and on the bottom (if horizontal placement).
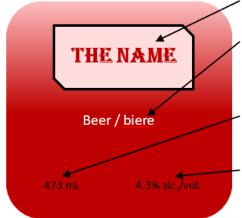
Lot Code All selling units must bear a lot code. A lot code can be numeric, alphabetical or alphanumerical.

Orangic Claims The Label of an organic product must have a bilingual organic claim 'organic/biologique' and bear the name of the certification body that certified the product as organic under part 13 of the SFCR.

Product Code Marking & Refund Statements As per the Safe Food for Canadian Regulations (SCFCR) a lot code is required on all selling units.A product date code is required on bag-in-a-box and TetraPak formats. Refund statements are optional but, if present, must be bilingual, minimum 1.6 mm in height. They must be worded such that the purchaser cannot construe that the point of return is the MBLL (e.g. contain a disclaimer such as "where applicable").

BEER *For products that meet the Standard of Identity for beer as per the Food & Drug Regulations Division 2*

Vignette and product brand name are optional but must not be misleading or imply irresponsible use of product when used
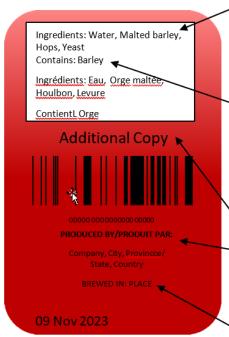
Common Name declaration must be bilingual. Minimal height is 1.6 mm based on the lower case "o". Beer common names incorporate adjectives which correlate to their alcoholic strength. Please refer to the Food and Drug Regulations (B.02.132) to determine qualified common name based on percentage of alcohol by volume.

Net Quantity The minimum size of numerical characters varies with surface area of container. The minimum size for a 355 mL or 473 mL is 3.2 mm. See Safe Foods for Canadians Regulations, Schedule 6 for other container sizes. Minimum size of mL or L is 1.6 mm, based on the lower case "m".

Alcohol Strength This is the bilingual format for alcohol declaration. The smallest letter must be at least 1.6 mm in height

Single Field of Vision Common name, net quantity, alcohol strength and country of origin must be visible in a single field of vision (must all be visible without rotating the can/bottle). These mandatory items can either be together on the back of front label.

Ingredient List A product which meets the standard of identity as set out in the Food and Drug Regulations for beer is exempt from the requirement of providing an ingredient list. However, if one is provided it must be bilingual and list all ingredients by descending order of proportion by weight. The declaration must appear in a box and be black text on a white background. Minimum font height of 1.1 mm based on the lower case "o".

Allergen declaration A product which meets the standard of identity as set out in the F&D Regs for beer is no longer exempt from the requirement of providing an allergen declaration. Beer labels must declare food allergens, gluten sources, or added sulphites. The declaration must be bilingual and state all allergens. The declaration must appear in a box and be black text on a white background. Minimum font height of 1.1 mm based on the lower case "o". Please refer to the F&D Regs for more information.

Additional Copy Any Copy or statements must not be misleading or imply irresponsible use of product. Not required to be bilingual.

Dealer Name and Address Require name and address of manufacturer or Canadian importer. Importer information must be preceded with "imported for / importe pour". (American importer must be removed or preceded with "In USA imported by".) Must be minimum 1.6 mm in height based on the lower case "o". Country name must be in English or French.

Brewing Location Declaration of the city/town/place where the beer was brewed.

GTIN Bar Code must appear on all consumer selling units, Minimum 80% magnification required. Human readable characters should be on the left (if vertical placement) and on the bottom (if horizontal placement).

Lot Code All selling units must bear a lot code. A lot code can be numeric, alphabetical, or alphanumerical. It must be readily discernable and legible.

Orangic Claims The Label of an organic product must have a bilingual organic claim 'organic/biologique' and bear the name of the certification body that certified the product as organic under part 13 of the SFCR.

Product Code Marking & Refund Statements As per the Safe Food for Canadian Regulations (SCFCR) a lot code is required on all selling units.A product date code is required on bag-in-a-box and TetraPak formats. Refund statements are optional but, if present, must be bilingual, minimum 1.6 mm in height. They must be worded such that the purchaser cannot construe that the point of return is the MBLL (e.g. contain a disclaimer such as "where applicable").

SPIRIT *For products that meet the Standard of Identity for spirits as per the Food & Drug Regulations Division 2*

SPIRIT

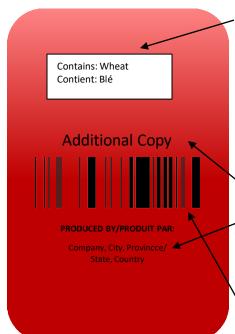Canadian Whisky / whisky canadien

750 mL   40% alc./vol.

Vignette and product brand name are optional but must not be misleading or imply irresponsible use of the product when used.

Common Name declaration must be bilingual. Minimum height is 1.6 mm based on the lower case "o".

Net Quantity The minimum size of numerical characters caries with surface area container. The minimum size for a 750 mL bottle is 3.2 mm. See the Safe Foods for Canadians Regulations, Schedule 6 for other container sizes. Minimum size of mL of L is 1.6 mm, based on the lower case "m".

Alcohol Strength This is the bilingual format for alcohol declaration. The smallest letter must be at least 1.6 mm in height. "alc. X.X% vol." is also accepted as bilingual.

Single Field of Vision / Common name, net quantity and alcohol strength must be visible in a single field of vision (must all be visible at once, without rotating the bottle). These mandatory items can be together anywhere on the label.

Contains: Wheat
Contient: Blé

Additional Copy

PRODUCED BY/PRODUIT PAR:

Company, City, Provincce/ State, Country

Ingredient List A product which meets the standard of identity as set out in the Food and Drug Regulations is exempt from the requirement of providing an ingredient list. However, if one is provided it must be bilingual and list all ingredients by descending order of proportion by weight. The declaration must appear in a box and be black text on a white background. Minimum font height of 1.1 mm based on the lower case "o".

Allergen declaration If an allergen is present in the finished product, an allergen declaration is required. The declaration must appear in a box and be black text on a white background. Minimum font height of 1.1 mm based on lower case "o".

Additional Copy Any Copy or statements must not be misleading or imply irresponsible use of product. Not required to be bilingual.

Dealer Name and Address Require name and address of manufacturer or Canadian importer. Importer information must be preceded with "imported for / importe pour". (American importer must be removed or preceded with "In USA imported by".) Must be minimum 1.6 mm in height based on the lower case "o". Country name must be in English or French.

GTIN Bar Code must appear on all consumer selling units, Minimum 80% magnification required. Human readable characters should be on the left (if vertical placement) and on the bottom (if horizontal placement).

Orangic Claims The Label of an organic product must have a bilingual organic claim 'organic/biologique' and bear the name of the certification body that certified the product as organic under part 13 of the SFCR.

Product Code Marking & Refund Statements As per the Safe Food for Canadian Regulations (SCFCR) a lot code is required on all selling units.A product date code is required on bag-in-a-box and TetraPak formats. Refund statements are optional but, if present, must be bilingual, minimum 1.6 mm in height. They must be worded such that the purchaser cannot construe that the point of return is the MBLL (e.g. contain a disclaimer such as "where applicable").

Overview of Regulatory Updates

This summary is intended as general information of the new regulatory requirements that impact the labelling of beverage alcohol products. MBLL takes no responsibility for any problems or errors in label design resulting from this overview. It is the manufacturer's responsibility to be familiar with and comply with all applicable Canadian laws pertaining to their products, including, without limitation, any labelling requirements set out in the Canadian Association of Liquor Jurisdictions (CALJ) standards, MBLL Product Packaging Standards and other MBLL operational and policy requirements.

If you have a specific question regarding the application of the new regulations to a particular product, please contact you own advisors or the Canadian Food Inspection Agency (CFIA). In addition, you may consult the information available on the CFIA website.

Nutrition Labelling

Beverages with an alcohol content of more than 0.5% are usually exempt from carrying a Nutrition Facts table (NFT). This exemption may be lost in certain situations, for example when a nutrient content claim is made or when an unstandardized alcoholic beverage contains added artificial sweeteners. If a NFT is present, it must fully meet the requirements as set out in the Canadian Food and Drug Regulations including serving size requirements.

Nutrition Facts Tables / The format of the nutrition facts table (NFT) and the list of nutrients have been updated to make the information clearer and easier to interpret for the consumer. The new requirements will apply to all products that have a voluntary or mandatory NFT on the label.

Updates include:

- Serving sizes have been regulated

- Changes to the format of the table to make the information on servicing size and calories easier to find and read due to larger font and bold line under the calorie content statement.

- The daily values percent has been revised

- A new daily value percent has been added for sugar

- The list of nutrients has been updated to add potassium and remove vitamin A and vitamin C. Amounts in milligrams must be shown for potassium and, calcium and iron.

- A footnote has been added at the bottom of the table to help consumers better interpret the daily value percentage.

List of Ingredients and Allergen Statements

There are significant updates to the list of ingredient requirements for formatting and new rules for declaring specific ingredients. These updates will make it easier for the consumer to find, read and understand the list of ingredients. The new regulations will apply to all products that have a voluntary or mandatory ingredient list on the label.

In addition, all formatting rules will apply to any allergen statements required to indicate the presence or potential presence of priority food allergens, gluten sources or added sulphites. The new regulations will apply to all products that have an allergen declaration ("contains" statement).

Updates include:

- Sugar-based ingredients must be grouped in brackets after the name "Sugars"

- The "colour" class/collective name has been repealed for permitted colouring agents; therefore, the term "colour" may not be used in the list of ingredients. Food colours must be listed by their individual common names.

- The text must be shown in a single colour that is a visual equivalent of 100% solid black and be shown on a white or neutral background that has a maximum 5% tint of colour, meeting the requirements as detailed in the CFIA guidance

- The ingredients list must be clearly differentiated on the label by using either a solid-line border around the ingredient list, one solid line appearing above and one solid line appearing below the list or with high contrast to the adjacent area of the label. If used, the solid line(s) must be the same colour as that used for the text in the ingredient list

- There is a minimum typeface height requirement for ingredients

- Ingredients or allergens must be listed separated by bullets or commas

- Each ingredient or allergen entry must appear in lower case letters while the first letter of each entry must be shown in upper case letters

- The font must be in a single standard "sans serif" font that is non-decorative, and the characters never touch each other.

- English and French ingredient lists must start on different lines

- The "Contains" statement must appear after the ingredient list of the same language

- The titles "Ingredients" and "Contains" must be in bold type

- The individual ingredients and components must be shown in regular font type. No bolding, italics or underline is permitted

Serving Size

The new regulations have introduced regulated reference amounts (RA) for beverage alcohol (see Table 1). The new reference amounts will better reflect the amount that Canadians consume in one sitting. Serving sizes are more consistent, which will make it easier to compare similar foods. On single-serving packages containing up to 200 percent of the reference amount for that beverage, the serving size will be the amount in the whole container. The new regulations will apply to all products that reference standard drinks or have a nutrition facts table present on the label.

Table 1: Reference Amounts of Beverage Alcohol

Wine	Beer	Coolers/RTD	Spirits
188 mL	333 mL	333 mL	50 mL*

 Note: a regulated reference amount has not yet been assigned for spirits. MBLL's smallest size in spirits is currently 50 mL.

Lot Code / Traceability

The Safe Food for Canadians Regulations (SFCR) set out traceability requirements for food products including beverage alcohol. This new regulation requires that all selling units must bear a lot code and products sold must have traceability documentation one step forward and one step backward in the supply chain.

Beer Compositional Standards

The Regulations Amending the *Food and Drug Regulations (Beer):* SOR/2019-98 came into force on April 15, 2019. The changes to the regulations apply to compositional standards and labelling declarations.

Specific to labelling requirements only, the following updates are highlighted:

- The use of a flavouring preparation triggers an additional requirement for a mandatory declaration that a specific flavouring preparation was used as part of the common name on the label (e.g. "beer with blueberry flavour").
- The standard for ale, stout, porter and malt liquor has been repealed. These terms can no longer be used as a common name declaration.
- Brewers are now required under the *Food and Drug Regulations (*FDR) to declare food allergens, gluten sources or added sulphites on the label. This change will help Canadians with food allergies, celiac disease or food sensitivities make more informed choices.

Note: Details on the updates of the beer compositional standards are not included in this document.

Vodka Compositional Standards

The Regulations Amending the *Food and Drug Regulations (Vodka):* SOR/2019-217 came into force on June 17, 2019. The changes to the regulations apply to compositional standards and labelling declarations. The new regulations allow vodka to be produced from agricultural products other than potato and cereal grain.

Specific to labelling requirements only, the following updates are highlighted:

- When vodka is produced from agricultural material other than just potatoes or cereal grains, the material used in production of the vodka must be indicated on the label with the expression "Produced from" followed by the name(s) of all the agricultural material used in close proximity.

Note: Details on the updates of the vodka compositional standards are not included in this document.

Frequently Asked Questions

1. Do these changes affect all product categories or only certain ones?

These changes have the potential of affecting products in all categories. Products that will be most affected are any products with an ingredient list, allergen statement, or Nutrition Facts table (NFt). These products must make changes to the label artwork to comply with the new format requirements and new rules for specific ingredients.

All selling units will be required to have a lot code.

2. How will standardized wine labels be affected?

There are new format requirements for all allergen declarations, including "contains" statements. Labels will have to be updated to comply with the new formatting rules. When used, a new Canadian single-serving size applies. As per the Safe Food for Canadians Regulations a lot code is required on all selling units.

3. How will standardized beer labels be affected?

As part of the amended Food and Drug Regulations, beer labels must declare food allergens, gluten sources, or added sulphites; the allergen declarations must follow the new format requirements.

The following terms can no longer be used as common name declarations: "ale," "stout," "porter" and "malt liquor". A common name of "beer/bière" with the appropriate beer strength modifier (example: "light/légère) must be used instead. The use of a flavouring preparation triggers a modified standardized common name listing the specific flavouring preparation used (e.g. "beer with blueberry flavour").

Labels will have to be updated to comply with the new formatting rules. When used, a new Canadian single serving size applies (see section 1.3). As per the *Safe Food for Canadians Regulations* a lot code is required on all selling units.

If the product label has a voluntary ingredient list, follow the instructions for an unstandardized beer.

4. How will unstandardized beer labels be affected?

Ingredient lists and allergen statements will be required to meet the new regulatory requirements for formatting and rules for specific ingredients. Labels will have to be updated to comply with the new regulations. When used, a new Canadian single-serving size applies. As per the *Safe Food for Canadians Regulations* a lot code is required on all selling units.

5. How will standardized spirits labels be affected?

There are no changes required unless the label contains an allergen declaration, or a voluntary ingredient list. As per the *Safe Food for Canadians Regulations* a lot code is required on all selling units.

If the product label has an ingredient list or allergen declaration, follow the instructions for an unstandardized product.

Please see question 13 specific to vodka products.

6. How will unstandardized product labels be affected?

Ingredient lists and allergen statements will be required to meet the new regulatory requirements for formatting and rules for specific ingredients. Where a Nutrition Facts table (NFt) is present, the NFt must meet the new regulatory requirements. Labels will have to be updated to comply with the new regulations. A new Canadian single-serving size applies. As per the *Safe Food for Canadians Regulations* a lot code is required on all selling units.

7.   What should a new ingredient list look like?

Ingredient lists (when present /required) must be bilingual. French and English versions of the ingredient lists must begin on separate lines. All ingredient lists must meet new formatting requirements.

8.   Does barley malt need to be grouped after the term "Sugars" in an ingredient list?

As part of the new regulatory requirements impacting the labelling of beverage alcohol products, there is a requirement to group sugar-based ingredients after the term "sugars" within an ingredient list. CFIA defines barley malt as a sugar-based ingredient.

However, barley malt, when it is subject to fermentation, may be listed outside of the sugars grouping in the list of ingredients. Therefore, an acceptable list of ingredients for a standard beer would be: Water, Barley malt, Hops, Yeast.

9.   The regulations require the font of the ingredient list, allergen statement, NFt and borders be shown in a single colour that is a visual equivalent of 100% solid black, what does this mean?

The regulations for the list of ingredients and NFt prescribe specific requirements for the colour of the font and boarders. If black ink has been used in the printing process, then the font and borders should be printed in black. However, another dark colour will suffice when black has not been used. Dark blue, dark brown and dark green are acceptable. Light green, red, orange, yellow, silver, and reverse printing (white printing on a dark background) are not acceptable.

Regardless of the printing process used, the approach would be to verify whether the final label meets the associated regulatory requirements. The rules regarding colour usage are similar to the ones that already apply to NFt [B.01.450(2), FDR], found here.

10.   The regulations require the ingredient list, allergen statement or Nft to be shown on a white or neutral background that has a maximum 5% tint of colour, what does this mean?

The regulations for the list of ingredients and Nft prescribe specific requirements for the colour of the background. The background colour should be white or neutral, with a maximum 5% tint. This level of tint provides only a slight colour to a background, and means the background is so pale that it is almost white. Backgrounds with more than 5% tint are not permitted. Dark backgrounds or reverse print are not permitted. In general, neither are clear backgrounds, where the colour is provided by the product underneath the clear packaging

11.   What does a "san serif" font mean?
Serif fonts have an extra stroke or decorative flare on the end of letters. Sans serif fonts do not have any extra design or strokes. "Serif" means stroke or line, and "sans" stands for without. Therefore, sans serif font means font without strokes or lines. Examples of "sans serif" fonts include Arial and Helvetica.

12. My product does not currently have a Nutrition Facts table. Do I now need to have one on my label?

The regulatory updates did not change the rules pertaining to Nutrition Facts tables on beverage alcohol labels. Beverages with an alcohol content of more than 0.5 per cent are usually exempt from the requirement of a Nutrition Facts table. However, this exemption may be forfeited in certain situations, such as when a nutrient content or caloric claim is made or when a product contains added sucralose, aspartame, or acesulfame-potassium.

Note: non-alcoholic beverages do not qualify for this exemption and must bear a nutrition fact table on the label.

13. How will the new Vodka Compositional Standards affect my labels?

Under the changes to the *Food and Drug Regulations*, the updated vodka standards now allow vodka to be produced from agricultural products other than potato and cereal grains. The standard also requires that consumers be informed when products other than just potatoes or cereal grains are used by requiring the use of the statement "Produced from" in conjunction with the common name "vodka." For example, if a vodka product is produced entirely from apples, the label must place "Produced from apples/Produite à partir de pommes" in close proximity to the common name of "vodka."

14. What does *close proximity* mean with respect to vodka labelling?

Close proximity in respect of information that is shown on a label, means immediately adjacent to the information and without any intervening printed, written, or graphic material.

15. My products are sold through LCBO Specialty Services. Do these label regulation changes affect my product?

Yes. Label updates will be required for items sold through Specialty Services as the regulatory changes apply to all alcoholic beverages sold in Canada regardless of their distribution channel.

16. I need to update my labels. Where is the best place to start to understand what is required?

It is recommended to review the Health Canada's summary of the food labelling changes. In addition, CFIA has updated the Food Labelling for Industry guidance; this online tool is a very comprehensive resource that can assist manufacturers and any other interested parties.

17. What are the transition deadlines?

The transition period for the labelling changes driven by the *Food Labelling Modernization Initiative* and published in the *Food and Drug Regulations* in 2016, ended on December 14, 2021. Due to pandemic challenges, CFIA announced that they will focus efforts on education on compliance during the first year, until December 14, 2022. While the regulatory compliance date remains December 14, 2021, the enforcement date has been extended by one year.

The *Safe Food for Canadians Regulations* came into force as of July 15, 2020. According to the SFCR, suppliers are required to ensure that consumer selling units bear a lot code that meets legibility requirements. Starting in 2022, the LCBO corrective measures are planned to evolve to include corrective labelling and/or application of penalties for noncompliance.

Beer and vodka producers will be required to make all necessary changes to their labels so that their labels are fully compliant to the new compositional standards by the end of the transition period. Updates driven by the Beer and Vodka Compositional Standard must be in market compliant by December 14, 2022.

18. Can MBLL help me update my label to meet the new requirements?

The MBLL does not offer commercial label services. To assist suppliers and agents with the transition to the new labelling requirements, the MBLL developed a simplified guide, available to access on the "Doing Business with Us" site at mbllpartners.ca

Manufacturers and agents desiring support to transition product to the new requirements may seek the services of professional label consultants. Such services can be identified online using "Canadian food label consultants" as the search criteria.

Glossary

Bar Code A symbol that encodes data into a machine-readable pattern of adjacent, varying width, parallel, rectangular dark bars and pale spaces.

Bar Code Symbol the Bar Code Symbol consists of both the bar code and the human readable data.

Close Proximity Immediately adjacent to the information and with out any intervening printed, written, or graphic material.

GTIN Bar Code

Lot Code Code that can be used to identify a lot that was manufactured, prepared, produced, stores, graded, packaged or labeled, under the same conditions.

Material of agricultural origin Food ingredients from an agricultural source such as, but not limited to: fruit, vegetables, grain, honey or dairy products.

Residual sugars Sugars that are still present in beer after the fermentation process has been completed

Traceability Ability to track the movement of a food or a food commodity, one step back and one step forward in the supply chain.

Wine An alcoholic beverage that meets the standard set out in section B.02.100 of the FDR {1, SFCR}.

Websites and Resources

- [Food and Drug Regulations (justice.gc.ca)](#)
- [Food labelling for industry - Canadian Food Inspection Agency (canada.ca)](#)
- [Canadian Food Inspection Agency - Food Labelling Modernization Initiative](#)
- [Labelling requirements - Canada.ca](#)
- [Safe Food for Canadians Regulations (justice.gc.ca)](#)
- [CALJ-Product-Identificatio-Standards.pdf (anbl.com)](#)
- [Notice to industry – Final publication of changes to Canada's beer compositional standards - Canadian Food Inspection Agency](#)
- [Notice to industry – Final publication of changes to Canada's vodka compositional standard in the Food and Drug Regulations - Canadian Food Inspection Agency](#)
- [Canadian Food Inspection Agency - Canadian Food Inspection Agency (canada.ca)](#)