Mandatory front-of-package labelling compliance by 2026 — Are you prepared?

May 02, 2025

In June 2022, Health Canada introduced new nutrition labelling regulations for prepackaged foods. A key feature of these regulations is the mandatory use of a front-of-package (FOP) nutrition symbol on products high in saturated fat, sugars, or sodium. This symbol is intended to help Canadians quickly identify less healthy food options, encouraging informed choices and reducing health risks associated with overconsumption of these nutrients.

Although the regulations came into effect in 2022, companies have until **January 1, 2026,** to comply.



Figure 1: Nutrition labelling: Front-of-package nutrition symbol

Which products require the FOP symbol?

The FOP symbol must appear on most prepackaged foods sold in Canada—whether produced domestically or imported—that meet or exceed specific thresholds for saturated fat, sugars, or sodium, as defined by their % Daily Value (%DV). Most prepackaged foods will require a FOP symbol if the food exceeds 15% DV of saturated fat, sugars or sodium.

In general, a prepackaged food product that requires a Nutrition Facts table (NFT) will also require a FOP symbol, unless explicitly exempted or prohibited under the *Food and Drug Regulations* (FDR). Exempted products may display the symbol voluntarily, provided the symbol and its placement follow the prescribed guidelines. Food products prohibited from bearing a FOP symbol include but are not limited to human milk fortifiers and substitutes, meal replacements, nutritional supplements, and foods represented for use in certain diets, each as defined within the FDR.

What are the design requirements for the FOP symbol?

To ensure consistency and clarity for consumers, the FOP symbol must meet strict requirements regarding:

- **Size**: Determined by the overall size of the food package.
- **Placement**: Typically located in the upper half of the principal display panel. On labels that are wider than they are tall, the symbol must appear on the right-hand side.
- **Language**: The symbol must appear in both English and French.

Health Canada's website includes visual examples and detailed technical guidance based on different packaging shapes and sizes.

What about existing products?

Food products made, imported, or packaged before January 1, 2026, under the previous regulations can continue to be sold, even after the compliance deadline. However, any new products produced after that date must meet the new labelling requirements.

What about nutrient content claims?

Alongside the FOP symbol, the regulations also incorporated an updated Table of Permitted Nutrient Content Statements and Claims (Table). This revised Table includes both new and updated claims—such as the addition of a "low in sugars" claim to the list of permitted statements.

Also, if a product is required to display a FOP symbol for saturated fat, sugars, or sodium, certain nutrient content claims related to that same nutrient are not allowed.

How will these rules be enforced?

The Canadian Food Inspection Agency (CFIA) will lead enforcement, with support from Health Canada. Their joint implementation plan outlines how compliance will be monitored and managed both during and after the transition period.

The CFIA has the authority to take enforcement actions against false, misleading, or non-compliant labelling. Health Canada will assist by conducting health risk assessments and offering interpretive guidance on the regulations.

What are the impacts on product advertising and marketing?

In addition to updating packaging, food brands should review all marketing materials and product claims to ensure they align with the new rules. Claims like “nutritious,” “healthy”, or “good for you” must be carefully evaluated—especially for products that carry an FOP symbol due to high levels of saturated fat, sugars, or sodium.

Even technically correct statements can be misleading. For example, suggesting a high-sodium product “can be enjoyed as part of a healthy lifestyle” may be viewed as deceptive if it downplays the health risks associated with sodium.

How we can help?

There is still time for manufacturers who have not yet begun preparation for the January 1, 2026, implementation of FOP nutrition labelling to understand their obligations and make any required changes to their food product labels. The FDR contains several exemptions for FOP nutrition labelling and the framework is continually evolving. As recently as March 6, 2025, Health Canada released an Interim Policy Statement exempting (i) prepackaged fresh single ingredient coconut and (ii) ready-to-eat breakfast cereals weighing 43 grams or more per 250 mL from the FOP nutrition labelling regime until regulatory changes to the FDR can be made to reflect this policy.

If you need assistance in understanding the current state of FOP nutrition labelling requirements or in achieving full compliance for your food products and associated advertising, our **Advertising and Marketing team** is here to guide you through packaging updates, marketing reviews, and regulatory interpretations.

By

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