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Legal Alerts

Canada's New Front-of-Package Nutrition Labeling Rules Now in Effect

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On January 1, 2026, the new requirements of the front-of-package (FOP) nutrition labeling program initiated by Health Canada and enforced by the Canadian Food Inspection Agency (CFIA) took effect. These regulations were published on July 20, 2022, but contemplated a compliance deadline of January 1, 2026.

The FOP nutrition symbol (the symbol) is intended to help consumers make quick and informed choices when shopping for groceries and support health professionals in educating consumers about foods that are high in sodium, sugars and saturated fat.

Affected Food Categories

The symbol is mandatory for pre-packaged foods that meet or exceed certain levels of saturated fat, sugars or sodium. The thresholds are based on Daily Values (DVs), which reflect either the recommended amount to consume each day or the amount that should not be exceeded. In general, the symbol is required at 15% DV for most foods, 10% DV for foods with a reference amount ≤ 30 g or 30 mL and 30% DV for pre-packaged main dishes. Section 4 of Health Canada's FOP Labeling Guide details nutrient thresholds that manufacturers must reference to determine whether a product meets or exceeds the levels of saturated fat, sugars or sodium that trigger the mandatory symbol.

Some products, such as those utilizing packaging with less than 15 cm^2 of available display surface, certain food service items, and products sold as sweeteners, salt, fats or oils, are fully exempt, meaning they do not need to assess nutrient levels or display the FOP symbol. Other products are conditionally exempt, meaning they are exempt from FOP labeling requirements unless specific conditions apply, and only then must the product be assessed against the thresholds to determine whether FOP labeling is required. For example, beverages with alcohol content greater than 0.5%, raw single-ingredient meat or seafood and individual servings of products sold for immediate consumption that have not been subjected to a process to extend their shelf life may all qualify for conditional exemption from the FOP symbol requirements.

Label Placement Requirements

The symbol features a magnifying glass and clearly identifies whether the product is high in saturated fat, sugars, sodium or a combination of the three nutrients. In most cases, the symbol must appear on the upper half of the principal display panel in a prominent, easy-to-notice location that is clearly visible and distinguishable from all other information appearing on the principal display panel. The symbol must be shown in both English and French using the prescribed nutrient statements. The symbol must use Health

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Canada's required format, including the specified icon, border, type, sizing and contrast, without modification. Placement rules also require that the symbol appear on the portion of the principal display panel that is most likely to be viewed first by consumers, including on cylindrical or irregularly shaped packages where the primary facing surface may differ from that of a flat panel.

United States Changes

In the United States, the Food and Drug Administration (FDA) proposed a rule to institute FOP nutrition labeling in January 2025. We previously provided an alert summarizing the FDA's initial position on the proposal. The FDA has not yet issued a final rule, but its 2026 priorities indicate that it is reviewing and summarizing public comments as the next step toward a final regulation.

Key Takeaways and Enforcement Considerations

As of January 1, 2026, all newly imported, manufactured or retail-packaged products for sale in Canada are expected to comply fully with Canada's FOP nutrition labeling requirements, and any non-compliant items will be subject to CFIA's standard regulatory response process. Products that were already imported, manufactured in Canada or packaged at retail before that date may continue to be sold, allowing a phase-out period for older inventory. Given the details of the new rules and the label placement requirements, manufacturers should carefully review all packaging destined for Canada to confirm compliance. Additionally, companies selling in both Canada and the United States should continue monitoring the FDA's rulemaking, as FOP labeling changes may eventually more closely align.

If you need guidance regarding a product that may be affected, please contact Foster Garvey's Food & Beverage team.

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