

The Guide to **Organic** **Labelling** in Canada



This publication is for information purposes only, and is sourced from the Safe Food for Canadians Regulations (SFCR), 2019 (SOR/2018-108) and accompanying Canadian Food Inspection Agency (CFIA) Directives.

All organic product must still be approved by a CFIA-accredited Certification Body. COTA will not be liable for damages of any kind arising from the use of the information contained within this guide.

For more information please visit: <http://www.inspection.gc.ca/food/requirements-and-guidance/labelling/industry/eng/1383607266489/1383607344939>

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What is organic?

Only products containing 95% or more organic content may be described as organic or carry the Canadian Organic Logo.

Having the logo is not mandatory, but it is a trusted symbol that is helpful for consumers.

There are no restrictions as to the location or size of the logo on organic product labels.

Obtaining the Canada Organic Logo for Canadian Product:

In order to use the Canada Organic Logo on product labels, an operator must apply to a Certification Body (CB) accredited by the CFIA, or one recognized under an organic trade arrangement with a foreign competent authority.

Using the Canada Organic Logo for Imported Products:

Labels or PLU stickers displaying the Canada Organic logo on imported items must indicate “product of” immediately preceding the name of the country of origin, or the statement.

NB: The Canada Organic logo may be used for information purposes without permission, but if used to market or sell a food, feed or seed product then the rules described herein must be followed.

Name of Certification Body

Organic products must be certified by a CFIA-accredited CB, and the name of that certifier **MUST** appear on the label.

The name of the CB can appear anywhere on the product, including the front label, except the bottom of the container. Minimum type size for the certifier’s name is 1.6mm based on the lower-case letter “o.” If an organic claim is made on a PLU sticker, the name of the CB must also appear on the PLU.

The label can display the name only of the CBertification Body or a phrase containing it such as “certified by X Certification Body” or “certified organic by X Certification Body.”

Organic Claims for Multi-Ingredient Products

Products with 95% or Greater Organic Content:

Multi-ingredient products that contain 95% or more organic ingredients may be labelled as organic and may display the Canada Organic logo.


These products may also be described using the words:

- Organically grown;
- Organically raised;
- Organically produced

or similar words including abbreviations of, symbols for, or phonetic renderings of those words. There is no limit to print size or font for these statements.

It is important to note that the words “certified organic” are NOT permitted for use in describing the product (e.g. certified organic bread). Under SFCR, all products using the descriptor “organic” must be certified to the Canada Organic Regime (COR) so this rule is to eliminate consumer confusion between a product labelled as “organic” versus another labelled as “certified organic.” As noted above, the words “certified organic” may be used in the label statement that identifies the CB.

A maximum of 5% of non-organic ingredients may be used in an organic product. These ingredients must be either listed on Canada’s organic Permitted Substances Lists (PSL) or be agricultural ingredients that are not commercially available in organic form. The cost of organic ingredient(s) is not a criterion for “commercially available.”

 While the claim “100% organic” may be seen on Canadian store shelves, this is NOT supported by the (COR) as it does not comply with Canadian organic labelling rules. A product may be labelled in Canada as containing “98% organic ingredients” if in fact that is consistently true and can be supported through an audit of production records.

Multi-Ingredient Products with 70-95% Organic Content:

Labels for these products CANNOT display the Canada Organic logo.

These labels may carry a statement that the product contains “XX% organic ingredients,” with the percentage rounded down to the nearest whole number. All numbers, signs, or symbols in this declaration must be of the same size and prominence. Minimum print size is 1.6mm, based on the lowercase letter “o.” There is no maximum print size. The declaration can appear on any panel, including the front panel.

All labels must identify the organic ingredients in the list of ingredients. In contrast with the 95% or greater organic category, non-organic ingredients may be used even if there is a commercially available organic alternative. However, the use of organic and non-organic versions of the same ingredient is not permitted.

These products also must be certified by a CFIA-accredited CB whose name must appear on any label or PLU making an organic claim.

Multi-Ingredient Products with less than 70% Organic Content:

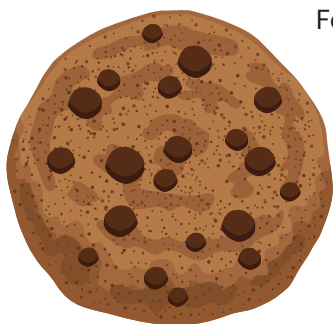
- ✔ May ONLY display the word “organic” in the product’s list of ingredients.
- ✘ May NOT be labelled as “organic” or carry the Canada Organic logo.

These products do not require certification. However, the organic ingredients contained within these products must be certified, and the manufacturer must maintain documentation regarding the supplier and organic status of these ingredients.

Determining the Percentage of Organic Ingredients

The percentage of organic content in a multi-ingredient product is determined in accordance with the Canadian Organic Standards (CAN/CGSB 32.310), which are incorporated into law by reference in the SFCR.

The calculation of a product's organic percentage requires breaking down multi-ingredient ingredients to distinguish between their organic and non-organic components.



For example, organic chocolate chip cookies will contain chocolate chips – an ingredient that is itself a multi-ingredient product. Therefore the organic content of the organic chocolate chips must be known (it must be somewhere between 95% and 100%) in order to calculate the organic content of the finished cookies.

Solid Products: Divide the net mass, excluding water and salt, of all organic ingredients in the formulation or finished product, whichever is more relevant, by the net mass, excluding water and salt, of all ingredients.

Liquid Products: If the product and its ingredients are liquid, divide the fluid volume of all organic ingredients, excluding water and salt, by the fluid volume of all ingredients, excluding water and salt. If the principal display panel, specification sheet, or certificate of analysis uses phrases like “reconstituted from concentrates” to describe the product, single-strength concentrations of the ingredients or the finished product shall be used to calculate organic percentages.

Any user of an ingredient, to which water or salt has been added by a prior processor, and is declared as water or salt on the ingredient declaration of the finished product is required to exclude this added water or salt when calculating organic percentages.

Solid and Liquid Products: Divide the combined net mass of solid organic ingredients and the net mass of liquid organic ingredients, excluding water and salt, by the total mass, excluding water and salt, of all ingredients in the finished product. Any user of an ingredient, to which water or salt has been added by a prior processor, and is declared as water or salt on the ingredient declaration of the finished product is required to exclude this added water or salt when calculating organic percentages.

Livestock feed: Livestock feed must contain 100% organic agricultural ingredients and the necessary feed additives or supplements (see s. 5.2 of CAN/CGSB 32.311). Divide the total net mass (excluding calcium compounds) of combined organic ingredients in the formulation or finished product, whichever is more relevant, by the total mass (excluding calcium compounds) of all ingredients.

NB: Remember that for the purposes of calculating a product's organic percentage value, salt and water are not included.

Other Logos and Import/Export Requirements

Canadian store shelves carry many products which display organic logos other than the Canada Organic logo. This is often facilitated by equivalency arrangements, which Canada currently has with five other countries:



United States



European Union



Japan



Costa Rica



Switzerland

Equivalency arrangements enable operators to sell their goods in other countries without requiring multiple certifications to each different national or regional organic standard.

In some cases, equivalency arrangements have additional requirements regarding the production of organic products which will be assessed by the CB if export markets are requested on an operator's application.

For products compliant to the terms of the US-Canada Organic Equivalency Arrangement (USCOEA), the words "compliant to the terms of the US/Canada Organic Equivalency Arrangement" must appear on documentation accompanying shipments of organic products. Depending on what documentation is used, this statement may appear on the organic certificate, transaction certificate, bill of lading, or purchase order.

The products traded under the USCOEA do not have to originate in either of those two countries as long as they meet the terms of this equivalency arrangement.

Canadian products exported to the EU under the EU-Canada Organic Equivalency Arrangement (EUCOEA) must be accompanied by a "Certificate of Inspection for Import of Organic product into the

European Community” which will be completed by the operator’s CB.

European products imported into Canada under the EU COEA must originate in one of the 28 European Union member states – Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom. At all times, when importing a product into Canada, documentation must be maintained to demonstrate that the product meets the requirements of COR directly, or via the terms of the relevant equivalency arrangement.

Regardless of which standard a product is certified to, organic products are expected to meet the labelling requirements of the country in which they are sold. Each country and region have their own unique rules for use of their organic logo. Proper label design will be assessed by the CB for operators applying to sell in markets other than their domestic market of origin.

All labels on products sold in Canada must also comply with the CFIA’s bilingual and, where applicable, product-specific labelling requirements.

Inputs used in the growth or manufacture of an organic product (such as crop pest control materials or sanitation chemicals for cleaning food-contact surfaces) must be compliant with the organic regulation where they are being used. They should not be labelled as “organic,” or display the COR logo because they are not certified organic themselves. Some CFIA-accredited Certification Bodies provide a service to review these inputs for compliance, as do other material review organizations such as the Organic Material Review Institute (OMRI). However, it is ultimately the responsibility of the CB overseeing the organic product’s manufacture to confirm whether or not any input used is compliant under COR.

Provincial Organic Logos

Two provinces have organic logos for products that are grown or processed within those provinces.



In order to use these logos, operators in Quebec and British Columbia must comply with the applicable provincial organic regulations. More information can be obtained from the respective provincial government websites:

<https://www.cartv.gouv.qc.ca/en/quebec-organic-designation-specification-manual>

<https://www.certifiedorganic.bc.ca/cb/certification.php>



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