

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

[Candice Kloes](#), [Benjamin Fuhrmann](#)

Expertise

[Corporate Commercial](#), [Advertising & Marketing](#)

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.