



OTCO Canada Organic Labeling and Regulations Guide



This guidance and these citations apply to products within the scope of the COR regulations that are shipped and sold within Canada; The Canada regulation covers food and drink intended for human consumption and food intended to feed livestock, including agricultural crops used for those purposes, and also the cultivation of plants.

- All labels must be Reviewed and approved by Oregon Tilth.
- Oregon Tilth will review and approve only the organic components of labels. Compliance to the full Canada FDA and Provincial Labeling requirements are the responsibility of the client.
- When not in compliance with NOP requirements (labeled for Canada only), containers & shipping documents must be labeled “For Export Only” (NOP 205.307(c))

Label Category	COR Requirements	Citations
100% Organic	<ul style="list-style-type: none"> • 100% claim is not an official category in the OPR, so it is not permitted. These products must be labeled “Organic”. Similar claims such as “Contains 100% Organic X”, although truthful, are also prohibited 	<ul style="list-style-type: none"> • Permitted Claims • Non Permitted Claims
“Organic”, “Organically Grown” etc. 95 - 100% Organic Ingredients	<ul style="list-style-type: none"> • May be labeled “Organic”, This is the only Front Label “Organic” Claim allowed under COR. • For multi-ingredient products, organic ingredients must be identified as organic in the ingredient listing. • An organic ingredient percentage statement (such as “98% organic ingredients”) in addition to the term “organic” may be used. The “X% Organic Ingredient” statement must be all the same color, size, font, and style and must be rounded down to the nearest whole number. • Use of the COR and/or the NOP Logo is optional. 	<ul style="list-style-type: none"> • Organic Claim
“Contains X% Organic Ingredients” 70%-95% Organic Ingredients	<ul style="list-style-type: none"> • The word "organic" may only appear on the PDP in the format of a % statement such as "X% organic ingredients" "Contains X% organic ingredients" "Made with X% organic ingredients". • The NOP Statement “Made With Organic X” is not permitted in Canada. • The “Contains X% Organic Ingredient” statement must be all the same color, size, font, and style and must be rounded down to the nearest whole number. • For multi-ingredient products, organic ingredients must be identified as organic in the ingredient listing. • The reference to organic and the percentage statement must appear in the same color and identical size and style of lettering as the rest of the ingredient panel. • Claims indicating “X% organic ingredients” where X is anywhere from 95-100% are permitted. However, the claim "organic" is encouraged as all products with 95% and over organic content may use this claim. • Use of the COR and/or NOP Logo is not allowed. 	<ul style="list-style-type: none"> • Organic Ingredient Claim
Less than 70% Organic Ingredients	<ul style="list-style-type: none"> • Organic ingredients may only be identified as organic in ingredient list. • Neither certification nor verification by a certifying body is required. However, claim must be true and documented. • Use of the COR and/or NOP Logo is not allowed. 	<ul style="list-style-type: none"> • Organic Ingredient Claim

Other	Details of other COR Labeling Requirements	Citations
Certifier Statement	<ul style="list-style-type: none"> All product labels that make any Organic claim must identify Oregon Tilth as the certifier with the statement “certified organic by Oregon Tilth” or similar. This statement can be placed anywhere on the label. This is the only place where the term “Certified Organic” can be used. 	<ul style="list-style-type: none"> Permitted claims
Prohibited Statements	<ul style="list-style-type: none"> 100% Organic Made With Organic Certified Organic 	<ul style="list-style-type: none"> Non permitted claims
Bi-Lingual Requirements	<ul style="list-style-type: none"> Retail labels (<i>any package which may be sold directly to consumers</i>) must be in both French and English. OTCO will review this only for label sections with organic requirements (e.g. product name, organic claims, ingredient panel, COB statement, etc.). The bi-lingual organic status of the product must appear once on the PDP however it is unnecessary to include bi-lingual statements where used multiple times. Non-retail shipping containers are exempt from bilingual requirements 	<ul style="list-style-type: none"> Language Requirements
Traceability	<ul style="list-style-type: none"> CFIA allows prepackaged fresh fruits and vegetables to display a lot code* or a unique identifier* (a numeric, alphabetic, or alphanumeric code to identify a lot of product) depending on whether it is “prepackaged” or “consumer prepackaged.” <ul style="list-style-type: none"> Consumer prepackaged: Fresh fruits or vegetables packaged in a container which is sold to or used or purchased by an individual (consumer) without being repackaged. Prepackaged: Fresh fruits or vegetables in any packaging that is not sold at retail to consumers (ex. a shipping container of fruits or vegetables sold from one business to another). Products that are consumer prepackaged & labelled for export and immediate retail without being repackaged in Canada under the COR-US Equivalency Arrangement must be labeled with a lot code except those that are considered exempt or subject to alternate requirements as described below. Prepackaged products other than consumer prepackaged (ex. shipping container), except bulk fresh fruit & vegetable commodities at point of sale, must present a lot code or an unique identifier. Exempt from lot code or unique identifier requirements are fresh fruits and vegetables sold in bulk at point of sale that are not consumer prepackaged or are packaged in a wrapper or confining band less than 13mm in width, or are packaged in a protective clear and transparent wrapper or bag which shows only price, bar code, number code, environmental statement, or product treatment symbol. Please refer to the USDA FAS GAIN Report: Lot Code Packaging Requirement Enforcement Begins January 15, which lays out specific additional considerations for the following product categories depending on whether they are packaged at retail or not, which are subject to exceptions: <ul style="list-style-type: none"> Consumer prepackaged FFVs that are packaged in such a manner that they are visible and identifiable in the container (includes whole and fresh cut). Consumer prepackaged fresh apples that are packaged such that the variety name is shown on any part of the label, except if that name is applied to the bottom of the container. <p><i>*For examples of unique identifiers and lot codes, see the SFCR: Glossary of key terms.</i></p>	<ul style="list-style-type: none"> Traceability USDA FAS GAIN Report: Lot Code Packaging Requirement Enforcement Begins January 15

Other	Details of other COR Labeling Requirements	Citations
<p>Non-retail labels; bags, sacks, boxes, totes, pallet stickers etc. that make ANY Organic claim</p>	<ul style="list-style-type: none"> • COR Labeling regulations do not distinguish between retail and non-retail packaging. Except; Non-retail shipping containers are exempt from Bi lingual requirements. • If an organic claim is made on a label accompanying a bulk product, such as on a tag or sticker, then the name of the certification body must also appear on this label. <i>Example:</i> this applies to the use of organic claims and the organic logo on a Price Look-Up (PLU) sticker. 	<ul style="list-style-type: none"> • Organic on labels accompanying bulk products
<p>Organic Seal/Logo COR Organic Logo or “Agricultural Product Legend”:</p>	<ul style="list-style-type: none"> • Use of the COR Logo is optional for organic (95%-100% organic) products. It is not allowed for less than 95% organic products. • According to the terms of the COR-US Equivalency Arrangement <u>either or both</u> the NOP and COR Logo are permitted. • The COR Organic Seal/Logo can be requested from OTCO. • “The logo is displayed in either black with a white background (as illustrated), in black with a transparent background or in color over any colored background as long as the original logo colors are not distorted. • If displayed in color, the background is white or transparent, the outer and inner borders are green • (Pantone no. 368), the maple leaf is red (Pantone no. 186) and the lettering is black.” • All products imported into Canada using the COR Seal must include the phrase “Imported” or “Imported From (country of origin)”, or “Product of (listed country of origin)” in close vicinity to the seal. If used more than once, the “Product of” or “Imported” phrase is only required to be in close proximity to one seal/logo. • Products Packaged and Labeled in Canada where no processing steps that modify the nature of the product are performed in Canada must also include the phrase “Imported” or “Imported From (country of origin)” • Parties wishing to use the logo, for any use other than product labeling (i.e., in retail marketing/advertising for informational purposes), must apply for a license to do so. Requests for an application form may be sent to OPR.RPB@inspection.gc.ca 	<p>CFIA Guidance</p>

Canada Organic Products Regulation; Labeling Resources	
Canada Food Labeling Guidelines	http://www.inspection.gc.ca/english/fssa/labeti/guide/tab2e.shtml
Canada Food and Drug Act Regulations	http://www.hc-sc.gc.ca/fn-an/legislation/acts-lois/act-loi_reg-eng.php
Canada Organic Regulations	https://inspection.canada.ca/organic-products/regulating/eng/1328082717777/1328082783032
CFIA Organic Claims on Food Labels	https://inspection.canada.ca/food-label-requirements/labelling/industry/organic-claims-on-food-labels/eng/1389725994094/1389726052482
Memo; Use of the Canada Organic Logo on Imported Organic Products	https://inspection.canada.ca/organic-products/guidance-documents/canada-organic-regime/imported-organic-products/eng/1437399387129/1437399387863
USDA FAS GAIN Report: Lot Code Packaging Requirement Enforcement Begins January 15	https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Lot%20Code%20Packaging%20Requirement%20Enforcement%20Begins%20January%202015%20Ottawa%20Canada%2001-11-2021