

Packaging and Labelling Act. The requirements of this act can be summarized as follows:

1. That food be prepared, packaged and held under sanitary conditions
2. That food be safe, clean and wholesome
3. That labelling be honest and informative

To put these barriers into perspective, let us look at the incidence of problems for Canadian products entering the U.S. in a typical year. Out of 400,000 entries, about 100,000, or 25 percent, are FDA related. Of these 100,000 FDA related entries, about 100 are inspected, of which 16 were detained. Of these 16 detained products, 9 had label problems, 2 used incorrect forms and only 5 were found in violation. So, as you can see, with the proper home-work, exporting to the U.S. does not have to be difficult. In designing their food product label(s), and before requesting comments from the U.S. Food and Drug Administration (FDA), exporters should ensure that the following key requirements have been met:

1. All the required statements must be on the label(s), i.e.: statement of identity (name of the food); net weight statement or statement of contents; and statement of ingredients. As well, the name and address of the company, and possibly a statement of nutrition. (If a second language is used then all required information must also be shown in the second language.)
2. The statement of identity in English must be in a term that is common and can be easily understood by the public.
3. The statement of identity must appear on the principal display panel (PDP) in lines generally parallel to the base, and in a size reasonably related to the most prominent printed matter therein. (The FDA has indicated that "reasonably related" is at least one-half the height of the most prominent printed material).
4. The statement of weight must incorporate the term "net weight" or "net

wt". If it is a fluid measure, you should use a term that will differentiate a fluid ounce from an avoirdupois ounce.

a. The complete statement of weight must appear in the required type size (refer to a food labelling guide for type size requirements) and in the lower 30 percent of the PDP.

b. The statement of weight or contents must be expressed in avoirdupois measure, fluid measure (U.S. fluid ounces,) pints, quarts, gallons) or numerical count. (Note: metric measure may also be shown as an additional statement.)

5. The ingredients must be listed by their common or usual name and in descending order of predominance by weight on the information panel directly to the right of the PDP. And the print or type size must be at least one sixteenth (1/16) of an inch in height based on the lower case letter "o".
6. Certified colours must be listed in the ingredient declaration. (Note: If you now have labels printed which comply with the other FDA labelling regulations and all certified colours are not listed, you may use those existing labels until early 1993. Any labels printed after July 1, 1991 are required to list all the certified colours that are used.)
7. If your product is a standardized food, all ingredients - as opposed to only optional ingredients - must be listed. (Note: If you now have labels printed which comply with the other U.S. FDA labelling regulations and all ingredients are not listed in standardized foods, you will be able to use those existing labels until early 1993. Any labels printed after July 1, 1991 are required to have all ingredients listed).
8. The address of the manufacturer, packer or distributor must include the word "Canada" and the postal code,