

**Voluntary Report** – Voluntary - Public Distribution

**Date:** January 11,2021

**Report Number:** CA2021-0002

**Report Name:** Lot Code Packaging Requirement Enforcement Begins  
January 15

**Country:** Canada

**Post:** Ottawa

**Report Category:** Agricultural Situation, Avocado, Canned Deciduous Fruit, Dried Fruit, Fresh Deciduous Fruit, Fresh Fruit, Kiwifruit, Raisins, Stone Fruit, Strawberries, Vegetables, Tomatoes and Products

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**Report Highlights:**

On January 15, 2021 enforcement of lot code requirements for fresh fruit and vegetables will begin, following a one-year extension provided to industry to use up existing packaging. Under Canada's Safe Food for Canadians Regulations, most prepackaged product must have a lot code or unique identifier on the label.

The [Safe Food for Canadians Regulations \(SFCR\)](#) came into force on January 15, 2019, with implementation [timelines](#) by category of food commodities. On January 15, 2020, preventive control plans, preventive controls, and remaining traceability requirements under the [Safe Food for Canadians Regulations \(SFCR\)](#) came into force for the majority of fresh fruits and vegetables sold in Canada. However, in order to enable industry to use any remaining packaging, the Canadian Food Inspection Agency (CFIA) agreed to a [one-year extension](#) on enforcing lot code requirements. This extension will expire on January 15, 2021.

Most prepackaged fresh fruit or vegetables are required to include a lot code or a unique identifier (lot code if it is a consumer prepackaged food not packaged at retail), the common name of the food, and the name and principal place of business of the company by or for whom the food was manufactured on the label, which must be applied, attached, or accompanying the food when it is provided to another person. General guidance on [importing fresh fruits and vegetables](#) is publicly available on the Canadian Food Inspection Agency (CFIA) website.

The term "lot code" is not specifically defined in the SFCR nor in the [Safe Food for Canadians Act \(SFCA\)](#), but is included in the [SFCR: Glossary of key terms](#) and would typically be a numeric, alphabetic, or alphanumeric code to identify a lot of product. For the fresh fruit and vegetable industry, CFIA provides that the following are also permitted to be used as a lot code:

- Harvest date
- Grower identification number
- GPS coordinates
- Growing region\*

\*when using a growing region as lot code, it must be sub-national (i.e. country of origin is not acceptable). State/province is acceptable as a growing region.

There are labeling exemptions for *lot code* or *unique identifier* requirements for fresh fruits and vegetables at the time of sale to consumers at retail including the following (*source: [CFIA](#)*):

- not consumer prepackaged (ex- bulk display foods)
- packaged in a wrapper or confining band less than 13 millimeters in width
- packaged in a protective clear and transparent wrapper or bag which shows no additional information beyond price, bar code, number code, environmental statement, or product treatment symbol

For a synopsis of traceability requirements see Table 1 below.

CFIA has also provided the following clarifications regarding definitions:

- Prepackaged other than a consumer prepackaged fresh fruits or vegetables includes any packaging that is not sold at retail to consumers, e.x. a shipping container of fruits or vegetables sold from one business to another.

- Prepackaged fresh fruits or vegetables includes any container in which the food is sold or purchased and includes consumer prepackaged.
- Consumer prepackaged specifically refers to fresh fruits or vegetables packaged in a container which is sold to or used or purchased by an individual (consumer) without being repackaged.
- CFIA will be providing updated guidance as part of its food product innovation regulations (previously food labeling modernization) in Fall 2021 concerning labeling requirements and exemptions for random weight consumer prepackaged bags. Until then, a synopsis of labeling guidance on fresh fruits and vegetables for [consumer prepackaged](#) and [prepackaged other than consumer prepackaged](#) can be found on the CFIA website.

**Additional Information:**

For additional details and information regarding general SFCR questions or specific requirements related to fresh fruits and vegetables, please refer to [CFIA's website dedicated to food](#).

In addition, CFIA has developed [detailed and updated guidance](#) to assist businesses in complying with various SFCR provisions.

For any additional questions, businesses may contact CFIA at the following number:  
1-800-442-2342.

**Table 1: Traceability-specific labelling requirements for fresh fruits or vegetables**

Traceability-specific labelling requirements	Must have <u>lot code</u>	Must choose between: <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
<b>Grow or harvest (<u>interprovincial trade</u>)</b>				
<u>Consumer prepackaged</u>	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
<u>Prepackaged</u> other than consumer prepackaged (for example, shipping container)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
<b>License holders who <u>manufacture</u>, <u>process</u>, <u>treat</u>, <u>preserve</u>, <u>grade</u>, store, <u>package</u> or <u>label</u></b>				
Consumer prepackaged	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
Prepackaged other than consumer prepackaged (for example, shipping container)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
<b>Interprovincial trade (sole activity)</b>				
Consumer prepackaged FFV	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]

Traceability-specific labelling requirements	Must have <u>lot code</u>	Must choose between: <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
Prepackaged other than consumer prepackaged (for example, shipping container)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
<u>Import</u> (sole activity)				
Consumer prepackaged FFV	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
Prepackaged other than consumer prepackaged (for example, shipping container)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
<u>Retail</u> (at place of sale to the consumer)				
Consumer prepackaged, <b>not packaged at retail</b> (*exception)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [92(1)]
*Consumer prepackaged FFVs that are packaged in such a manner that they are visible and identifiable in the container (includes whole and fresh cut) ( <b>not packaged at retail</b> ) (for example, tomatoes packaged in a styrofoam tray that has been over-wrapped with clear plastic wrap do not have to be labelled with the common name "tomatoes")	✓ [92(2)]	X [92(2)]	✓ [92(1)]	X [219(1)(a); 92(4)]

Traceability-specific labelling requirements	Must have <u>lot code</u>	Must choose between: <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
*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 ( <b>not packaged at retail</b> ) (for example, apples in opaque bags, boxes, etc. that would not ordinarily be visible and identifiable in the package)	✓ [92(2)]	X [92(2)]	✓ [92(1)]	✓ [219(1)(b); 92(4)]
Consumer prepackaged, <b>packaged at retail</b> (**exception)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	✓ [92(1)]
**Consumer prepackaged FFVs that are packaged in such a manner that they are visible and identifiable in the container (includes whole and fresh cut) ( <b>packaged at retail</b> ) (for example, tomatoes packaged in a styrofoam tray that has been over-wrapped with clear plastic wrap do not have to be labelled with the common name "tomatoes")	X [92(1)]	✓ [92(1)]	X [220; 92(5)]	X [219(1)(a); 92(4)]
**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 ( <b>packaged at retail</b> ) (for example, apples in opaque bags, boxes, etc. that would not ordinarily be visible and identifiable in the package)	X [92(1)]	✓ [92(1)]	✓ [92(1)]	X [219(1)(b); 92(4)]

Traceability-specific labelling requirements	Must have <u>lot code</u>	Must choose between: <u>Lot code</u> or <u>unique identifier</u>	<u>Name and principal place of business</u>	<u>Common name</u>
FFV packaged in a wrapper, or confining band, less than 13 mm in width	X [213(b); 92(3)(c)]	X [213(b); 92(3)(c)]	X [213(b); 92(3)(c)]	X [213(b); 92(3)(c)]
FFV packaged in a protective wrapper, or a protective bag, that is transparent and on which no information is shown other than a price, bar code, number code, environmental statement or product treatment symbol (for example, FFV that are typically found in such protective wrappers or bags include an English cucumber, a head of lettuce or cauliflower, a bunch of grapes, etc.)	X [213(c); 92(3)(c)]	X [213(c); 92(3)(c)]	X [213(c); 92(3)(c)]	X [213(c); 92(3)(c)]
FFV that are not consumer prepackaged, for example food that is presented in bulk display	X [92(3)(b)]	X [92(3)(b)]	X [92(3)(b)]	X [92(3)(b)]

Source: [CFIA](#)

✓ denotes applicable/required.

X denotes not applicable/not required.

[SFCR reference] provides applicable regulatory reference

**Attachments:**

No Attachments.