



Industry Notice

14 November 2008

TO: Canadian Fish Processors and Importers

SUBJECT: Labelling of Raw Fish Products that have a Cooked Appearance and may be Mistaken for a Ready-to-eat Product

Note: The information in this notice supersedes that contained in Bulletin no.42 of the Fish Products Inspection Manual dated 24/03/06. Bulletin 42 has been removed from the manual.

The purpose of this notice is to inform fish processors and importers of the labelling requirements for raw fish products that have a cooked appearance and may be perceived by consumers as ready-to-eat products. Examples of such products include frozen "flash fried" breaded fish portions, frozen fillets with grill marks, or raw bivalve shellfish on a shell with a cooked topping.

All foods, including fish and fish products, must be labelled in a manner that is not false, misleading or deceptive, and is not likely to create an erroneous impression regarding character, value, quantity, composition, merit or safety of the food (Section 5.(1) of the *Food and Drugs Act*; Section 27 of the *Fish Inspection Regulations*). The products subject to this notice are *raw* fish products that may pose serious microbiological health hazard if consumed without proper cooking. Processors and importers must ensure that the labels on these products do not give any false impression regarding the product's character or safety. In this regard, the following key points must be considered:

- i) Information indicating that the product is raw and must be properly cooked prior to use must be clearly visible and present in both official languages on the principal display panel (PDP).
- ii) Statements such as "ready-to-eat," "heat and serve", "grilled fillets", "fried fish" or other statements giving any impression that the product can be consumed without further cooking are not permitted.
- iii) Cooking instructions are optional. However, if present, they must be adequate to ensure safety of the product.
- iv) If a vignette is present which creates an impression that the product is ready-to-eat, the statement "Serving suggestion" (or similar) in both official languages must be on, or adjacent to, the vignette.
- v) Storage conditions to ensure safety of the product must be present on the label in both official languages (e.g., "keep frozen" statement on frozen products; "keep refrigerated" and "best before" date on products sold under refrigeration).

Notes:

1. The labelling requirements outlined above will be incorporated into Chapter 15 of the *Guide to Food Labelling and Advertising* available at: <http://www.inspection.gc.ca/english/fssa/labeti/guide/toce.shtml>
2. Requirements i), ii), iv) and v) (unless required by B.01.007(b) of the *Food and Drug Regulations*) do not apply to labelling of fully cooked ready-to-eat fish products, e.g. fully cooked crab legs.
3. For any products currently not meeting these requirements, labels must be brought into compliance within 6 months (from issue date of this Notice).
4. Labels on imported fish products subject to this Notice must be compliant **at the time of importation** into Canada.

original signed by

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