

Pre-Market Compliance Checklist

CFIA Licence Confirmation · Labelling Compliance

Canadian Novel Foods Regulatory Resource | Phase 5 — Pre-Market Readiness

Purpose: Use this checklist to confirm all compliance requirements are in place before your product enters the market. This phase runs in parallel with Phase 3 where possible.

Complete all sections before launch, regulatory approvals alone are not sufficient for market entry.

Disclaimer: *This is not an official government document. It does not constitute legal or regulatory advice. Always verify requirements with the regulatory entities involved.*

⚠ **Front-of-Package (FOP) Symbol:** *Mandatory from January 1, 2026 for products high in saturated fat, sugar, or sodium. Assess your product now, FOP labelling requirements may apply at launch. Review CFIA's FOP guidance before finalizing label artwork.*

PART 1 — SFCR Licence & PCP Confirmation

Confirm your licence is active in My CFIA before any interprovincial trade, export, or import activities begin.

Item	☐ Done	Notes
Licence Status		
SFCR licence confirmed as ACTIVE in My CFIA (my.cfia-acia.canada.ca) [REQUIRED]	☐	
Licence number recorded and available to operations team	☐	
Licence scope confirmed, all regulated activities and commodities are covered [REQUIRED]	☐	
Licence expiry date noted and renewal calendar reminder set	☐	
Any conditions attached to the licence reviewed and compliance plan in place	☐	
PCP Status		
Written PCP is finalized, approved, and in effect for all production activities [REQUIRED]	☐	

Item	☐ Done	Notes
PCP Interactive Tool completed (na1se.voxco.com/SE/) to verify PCP adequacy	☐	
All PCP prerequisite programs fully implemented (sanitation, pest control, allergen, hygiene) [REQUIRED]	☐	
Traceability system (one-step forward / one-step back) operational and tested [REQUIRED]	☐	
Staff trained on PCP procedures and training records on file	☐	
PCP records system active, daily monitoring logs, cleaning records, corrective action logs	☐	
Facility inspection-ready (CFIA may conduct verification inspection post-licence)	☐	

PART 2 — Labelling Compliance

All mandatory label elements must appear on your product before it enters the market. Use CFIA's Industry Labelling Tool (inspection.canada.ca/en/food-labels/labelling/industry) to verify your specific requirements.

2.1 Mandatory Label Elements

Mandatory Element	☐ Done	Notes
Identity & Description		
Common name of the food — clearly displayed on principal display panel [REQUIRED]	☐	
Common name confirmed with CFIA if novel food category (no established standard of identity)	☐	
Net quantity declaration in metric units — on principal display panel [REQUIRED]	☐	
Best-before date or durable life date included where required	☐	
Bilingual Requirements (English & French)		
All mandatory information appears in both English and French [REQUIRED]	☐	
Both languages given equal prominence on the label [REQUIRED]	☐	
Translation reviewed for accuracy — food terminology is precise in both official languages	☐	

Mandatory Element	☐ Done	Notes
Ingredient List		
Complete ingredient list in descending order of proportion by weight [REQUIRED]	☐	
All ingredients declared by their common name	☐	
Sub-ingredients declared where required (components of compound ingredients)	☐	
Food additives declared with function class and common name (e.g., 'colour: caramel')	☐	
Allergen Declaration		
All priority allergens declared — wheat, rye, barley, oats (gluten); eggs; milk; mustard; peanuts; seafood (fish, crustaceans, shellfish); sesame; soy; sulphites; tree nuts [REQUIRED]	☐	
'Contains' statement or parenthetical declaration used consistently [REQUIRED]	☐	
Cross-contamination advisory ('may contain') reviewed for accuracy	☐	
Allergen derived from novel food source — special disclosure confirmed with HC if required	☐	
Nutrition Facts Table (NFt)		
Nutrition Facts Table included (required for most prepackaged foods) [REQUIRED]	☐	
NFt format follows current CFIA requirements (2022 format) [REQUIRED]	☐	
All declared values validated against lab analysis [REQUIRED]	☐	
Serving size is appropriate and representative of typical consumption	☐	
% Daily Value calculated correctly for applicable nutrients	☐	
Manufacturer / Dealer Information		
Name and address of manufacturer, packer, or distributor in Canada included [REQUIRED]	☐	
Address includes street, city, province, and postal code	☐	
Front-of-Package (FOP) Symbol — Effective January 1, 2026		

Mandatory Element	☐ Done	Notes
Product assessed for FOP symbol requirement (high in saturated fat, sugar, or sodium?)	☐	
If FOP required: symbol applied to principal display panel in correct format	☐	
FOP symbol bilingual requirements confirmed	☐	
Novel Food Specific		
Any conditions or labelling requirements imposed by Health Canada in the safety decision are reflected on label [REQUIRED]	☐	
No unauthorised health or nutrition claims included	☐	
No misleading comparative claims (e.g., 'same as conventional X') without substantiation	☐	

2.2 Label Review Process

Review Step	Reviewed by	Date	Status
CFIA Industry Labelling Tool completed for all products			
AEI Questionnaire completed if required (My CFIA: Additional Establishment Information)			
Internal label review against all mandatory elements above			
Legal / regulatory counsel review (recommended for novel food categories)			
French translation verified by qualified translator			
Final label artwork approved before print			
Label retained on file with supporting documentation			

PART 3 — Provincial & Municipal Requirements

Federal SFCR compliance is necessary but not always sufficient. Verify applicable provincial food safety acts and municipal zoning for your facility. Requirements vary by province.

⚠ Provincial requirements are the responsibility of your internal team to verify.
 The table below covers key provinces. Check the relevant provincial ministry website for current requirements, regulations change and this is not an exhaustive list.
 Consult a local regulatory advisor if operating in multiple provinces.

3.1 Provincial Food Safety Requirements

Province	Key Legislation	Typical Requirement	Status
Ontario (ON)	Food Safety and Quality Act, 2001 (FSQA)	Food premise registration/licence if manufacturing in ON. Inspection by OMAFRA.	☐
British Columbia (BC)	Food Safety Act, RSBC 1996	Food establishment permit required from local health authority. BC Centre for Disease Control oversight.	☐
Québec (QC)	Loi sur les produits alimentaires (LPA)	Permit from MAPAQ (Ministère de l'Agriculture). French labelling laws may impose stricter requirements.	☐
Alberta (AB)	Food Regulation, AR 31/2006	Food establishment registration with Alberta Health Services. AHS inspection program.	☐
Other provinces	Check applicable provincial food safety legislation	Contact the provincial ministry of agriculture or health for requirements.	

3.2 Municipal Zoning & Facility Requirements

Item	☐ Done	Notes
Municipal zoning classification of facility confirmed — food manufacturing permitted at this location [REQUIRED]	☐	
Building permit obtained for facility use as food production establishment (if applicable)	☐	
Municipal business licence obtained [REQUIRED]	☐	
Wastewater / effluent discharge permits obtained if required (local utility / municipality)	☐	
Fire safety and occupancy permits in place	☐	
Local health authority inspection completed if required (varies by municipality)	☐	

Item	☐ Done	Notes
Noise, odour, and emission requirements for industrial zone reviewed	☐	

3.3 Provincial & Municipal Tracker

Jurisdiction	Requirement	Responsible Agency	Status	Reference / Contact
			☐ Pending ☐ Complete	
			☐ Pending ☐ Complete	
			☐ Pending ☐ Complete	
			☐ Pending ☐ Complete	
			☐ Pending ☐ Complete	
			☐ Pending ☐ Complete	

 Once all three parts of this checklist are complete, your product is cleared for market entry.
 Retain all compliance documentation — CFIA may request records during inspections.
 Proceed to Phase 6 for ongoing post-market obligations.