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Ask anything





I'm ready to help! To give you the most accurate answer, could you let me know the **context** of your "country of origin" question?

Depending on what you're looking for, the answer can change significantly:

- **For Products & Trade:** Are you trying to determine where a specific item was manufactured for customs, [importing](#), or [labelling](#) purposes?
- **For Immigration & Visas:** Is this for a [citizenship application](#), travel history form, or [refugee status](#)?
- **For Electronics:** Are you checking where your [iPhone](#) or another device was originally sold?
- **For People & Heritage:** Are you asking about someone's [ancestral background](#) or how to [professionally answer](#) this in an interview? 🇨🇦 Agence canadienne d'inspection des a... +6

Just let me know the **details**, and I'll dig into it for you.



inspection.canada.ca

Dec 6, 2023 — The use of a voluntary multi-statement (for example, "Product of France

🇨🇦 Agence canadienne d'inspection ...

Questions about Ethnicity & Country of Origin

Feb 14, 2026 — Should I be concerned about such an employer? Thanks for shari...

📄 Careers Done Write ⋮

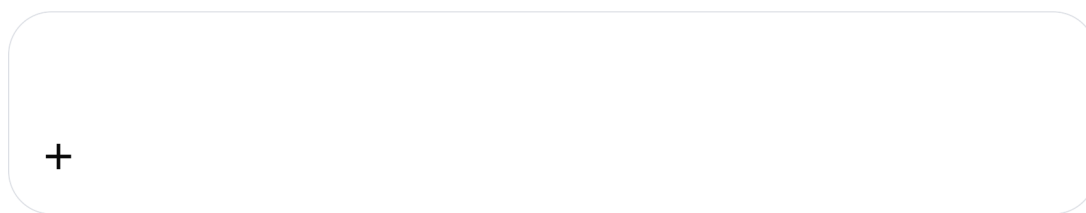
Application for Canadian Citizenship – Adults (CIT 0002) - Canada.ca

Feb 6, 2026 — Question 10. * Address History. Write all your addresses inside and.

🇨🇦 Canada.ca ⋮

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Suppose I want as a manufacturer build a product in Canada. Which "Made in Country" should apply? The PCB... ▾



Made in Canada and a Claims ...

ims made in signage) and by...

Canada ⋮

Claims

'ill generally not states that a...



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Canada"

The [Competition Bureau Canada](#) sets three strict conditions for non-food

products: Competition Bureau Canada +1

comeback, be mindful of ...

Feb 7, 2025 — As "Made in Canada" claimants make a comeback, be mindful of labelling

MLT Aikins

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- **Last Substantial Transformation:** The final major assembly or process that turns the parts into a new, distinct product must happen in Canada.
- **51% Direct Cost Threshold:** At least **51%** of the total direct costs (including materials, direct labour, and manufacturing overhead) must be incurred in Canada.
- **Mandatory Qualifier:** You **must** include a statement like:
 - "Made in Canada with imported parts"
 - "Made in Canada with domestic and imported parts" MLT Aikins +4

2. Evaluating Your Specific Scenario

Based on your description, here is how your production steps likely align with the rules:

- **PCB Fabrication (China):** This is a foreign direct cost.
- **Component Mounting/Soldering:**
 - If done in Canada, the labour and overhead contribute to your **51% Canadian cost** requirement.
 - If done in China, these are foreign costs and

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transformation, which is a requirement for any Canadian origin claim. MLT Aikins +6

3. Alternatives if 51% Cost is Not Met

In a globalized world where components (chips, resistors, etc.) are almost exclusively foreign, hitting the 51% direct cost mark can be challenging. If you don't meet that threshold, the [Competition Bureau](#) recommends more specific, truthful claims: Competition Bureau Canada +1

- **"Assembled in Canada with foreign parts"**
- **"Designed in Canada"** (if the main value-add is the FW and engineering) Competition Bureau Canada +2

Summary Table: Canadian Origin Claims

Claim Type	Content Threshold	Last Substantial Transformation	Mandatory Qualifier
Product of Canada	98% Canadian	Must be in Canada	No
Made in Canada	51% Canadian	Must be in Canada	Yes (e.g., "with imported parts")
Assembled in Canada	< 51% Canadian	Must be in Canada	No





To determine if your product meets the **51% Canadian direct cost threshold**, you must categorize every expense into "Domestic" (Canada) or "Foreign" (China/International).

1. What Counts as Direct Production Costs?

According to the [Competition Bureau Canada](#), direct costs are limited to expenses **directly related** to the manufacturing of the physical unit. 🇨🇦 Competition Bureau Canada +1

- **Direct Materials:** The actual parts used in the unit (PCB, resistors, casing).
- **Direct Labour:** Wages for employees physically assembling, soldering, testing, or packaging the product.
- **Manufacturing Overhead:** Only if it is **directly**



🇨🇦🇺🇸 12 sites

yes

What You Need to Know Before Using "Product of Canada ...

"Made in Canada" * Direct costs of producing or manufacturing. All or at least...



- BCF Avocats d'affaires

"Product of Canada" and "Made in Canada" Claims

Mar 17, 2025 — Definitions. For the purpose of these guidelines, the following definitions apply: * 2.1 Cost of...

- 🇨🇦 Competition Bureau Canada

"Made in Canada" vs. "Product of Canada" - Miller Thomson

Mar 27, 2025 — Representing Canadian consumer goods. The Competition Bureau...



- ✳️ Miller Thomson

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for tech products.



- R&D and Design:** Generally, the Competition Bureau **excludes** research, development, and high-level design costs from "direct production costs" because they are typically one-time capital expenses, not per-unit manufacturing costs.
- Production Firmware Loading:** You **can** count the labour cost of a Canadian technician physically flashing the firmware onto each unit during assembly as a Canadian direct labour COST. 🇨🇦 Competition Bureau Canada +3

3. Checklist for Your Scenario

To hit the 51% mark, your Canadian value-add must outweigh the cost of the imported parts.

Item	Cost Origin	Included in 51%?
PCB Fabrication	China	No (Foreign Material)
Electronic Components	Global	No (Foreign Material)





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Testing & Quality Control Canada **Yes** (Domestic Labour)

Packaging Materials Canada **Yes** (Domestic Material)

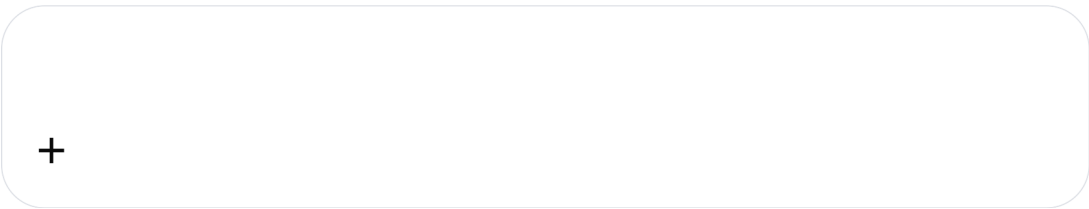
FW Development (R&D) Canada **Generally No** (Excluded as R&D)

4. Important Compliance Tip

If your imported component costs (PCB + chips) are high, it is often very difficult to reach 51% through assembly labour alone. If you fall short:

- **Do not use** "Made in Canada."
- **Instead, use:** "Designed in Canada, Assembled in Canada" or "Assembled in Canada with foreign parts". These are considered truthful, non-misleading alternative claims. ✳ Miller Thomson +4

Would you like to know more about the **legal penalties** for misusing these labels under the [Competition Act](#)?





lead to severe financial penalties, court-ordered corrective actions, and even criminal prosecution under the [Competition Act](#). The penalties are significantly higher for corporations than for individuals. 🇨🇦 Competition Bureau Canada +3

1. Civil Penalties

Most "Made in Canada" labelling issues are handled as civil matters. If a court finds a claim to be materially false or misleading, it can order:

- **Administrative Monetary Penalties (AMPs):**
 - **For Corporations:** Up to **\$10 million** for a first offence (increasing to \$15 million for subsequent offences). Alternatively, the penalty can be the greater of \$10 million or **three times the value of the benefit derived** from the deceptive conduct.
 - **For Individuals:** Up to **\$750,000** for a first offence (\$1 million thereafter), or three times the benefit derived.
- **Restitution:** You may be ordered to pay back consumers up to the total amount they paid for the product.
- **Corrective Notices:** You may be forced to publish notices (at your own expense) in media to correct the misleading



Competition Bureau Canada

False or misleading representations - Competition Bureau Canada

Nov 25, 2024 — False or misleading representations. In addition to prohibiting specific practices, the Competition Bureau Canada

Competition Bureau Canada

False or Misleading Representations and Deceptive ...

Feb 19, 2026 — Under the civil regime, certain practices may be brought before the Competition Tribunal, the Federal Competition Bureau Canada

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to one year.

- **Indictment:** Fines are at the **discretion of the court** (no fixed cap) and can include imprisonment for up to **14 years**. 🇨🇦 Competition Bureau Canada +2

3. New Era of Enforcement (June 20, 2025)

A major change is coming to the Competition Tribunal:

- **Private Actions:** Starting **June 20, 2025**, private parties (such as competitors or interest groups) can seek leave to bring their own cases to the Tribunal if they believe a "Made in Canada" claim is misleading.
- **Public Interest Test:** These private parties only need to show that their application is in the **public interest** to proceed. 🇨🇦 www.ipvancouverblog.com +1

4. Other Related Fines

Beyond the Competition Act, smaller fines of **\$5,000 to \$10,000** can also be levied under the [Consumer Packaging and Labelling Act](#) for general labelling inaccuracies. 🇨🇦 Competition Bureau Canada +1

Would you like to review some **case studies** of how the Bureau has handled misleading origin claims in the past to see





To understand how the Competition Bureau handles these cases, it is helpful to look at how they define "**Last Substantial Transformation**" and "**Direct Cost.**" The Bureau prioritizes the "general impression" a consumer gets from your label.

1. The Moose Knuckles Case (2016)

This is the most significant modern case for "Made in Canada" enforcement. The Bureau alleged that Moose International Inc. misled consumers by labeling parkas as "Made in Canada" when they were mostly manufactured in Vietnam. 🇨🇦 Canada.ca

- **The Issue:** The parkas arrived in Canada nearly finished. Only "finishing touches"—adding zippers, snaps, and fur trim—were done in Canadian factories.
- **The Ruling:** The Bureau argued these minor additions did **not** constitute a "substantial transformation".
- **The Penalty:** To resolve the case, the company entered a consent agreement and agreed to:
 - Donate **\$750,000** to Canadian charities



Apr 27, 2016 — The Bureau has filed an application with the Competition Tribunal alleging that the parkas are marketec

🇨🇦 Canada.ca

What You Need to Know Before Using "Product of Canada" and " ...

The Moose Knuckles Case (2016) ... The coats in question were almost entirely...



● BCF Avocats d'affaires

Competition Bureau Takes Action Against Moose Knuckles

May 5, 2016 — CASE SUMMARY * The last substantial transformation of the goods occurred in Canada. * At least

🇨🇦 JD Supra

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Cases



The Bureau has a long history of targeting companies that use the "Made in Canada" label to command a price premium while outsourcing the bulk of production:

- **Electronics (1989):** A TV manufacturer was sanctioned for creating a misleading impression that its televisions were made in Canada when they were largely imported.
- **Apparel (1997):** A major brassiere manufacturer (WonderBra) faced charges for physically removing "Made in Costa Rica" labels and replacing them with "Made in Canada" tags. [SE](#) Stikeman Elliott

3. Key Takeaways for Your Product

From these cases, the Bureau has made three things very clear for your electronics project:

1. **Substantial Transformation is Key:** For your product, "mounting and soldering" the PCB in Canada likely qualifies as a substantial transformation because it turns raw parts into a functioning circuit. If you do this in China





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qualitier hidden on an inside care label, but the Bureau ruled it wasn't prominent enough to change the "general impression" of the "Made in Canada" claim.

- 3. Symbols Matter:** Using maple leaves, "proudly Canadian" slogans, or hockey imagery can reinforce a misleading claim. The Bureau explicitly cited the use of Canadian symbols as evidence of a misleading general impression. • BCF Avocats d'affaires +3

What this means for your 51% calculation:

If your imported components (chips from the US, PCB from China) make up \$50 of a \$100 manufacturing cost, and your Canadian assembly labour is \$10, you are only at **10% Canadian content**. In this case, you cannot use "Made in Canada." You should instead use:

- **"Assembled in Canada with imported parts"**
- **"Designed and assembled in Canada"**

Would you like to see a sample **cost-calculation template** to help you determine your exact





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To determine if your product meets the **51% Canadian direct cost threshold**, you must categorize every manufacturing expense as either **domestic** (Canada) or **foreign**. Use the calculation method below to see where you stand.

1. Direct Cost Calculation Template

According to the [Competition Bureau Canada](#), you must sum your **total direct costs** and determine what percentage was incurred in Canada.

Category	Description	Origin	Cost
Direct Materials (Foreign)	PCB (China) + All Global Electronic Components	Foreign	\$_____
Direct Materials (Domestic)	Packaging, Enclosure, or any Canadian-made parts	Canada	\$_____
Direct Labour	Wages for Canadian assembly, soldering, and testing	Canada	\$_____
Manufacturing Overhead	Factory rent, utilities, and equipment depreciation (Canada-only)	Canada	\$_____
TOTAL DIRECT COST	(Sum of all rows above)	—	\$100%

2. The Formula


To qualify for a "Made in Canada" claim, your result must be **51% or higher**:

3. Example Scenario

If your imported electronics are expensive, it can be very difficult to hit the 51% mark through assembly alone.


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In this example, you **would not** meet the 51% threshold and could not use "Made in Canada." You would instead use a claim like **"Assembled in Canada with imported parts."**  Competition Bureau Canada +3



4. Critical Inclusions & Exclusions

- **INCLUDE:** Only the costs directly involved in making the physical unit. This includes the labour of a Canadian technician flashing your firmware during production.
- **EXCLUDE:** High-level design, firmware R&D, marketing, and distribution costs. These are typically considered indirect costs or capital expenses and do not count toward the 51% manufacturing threshold.  Competition Bureau Canada +1

Would you like help drafting a **specific alternative label** (like "Designed in Canada") that highlights your engineering work without risking a fine?

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