



QUEBEC GOVERNMENT BILL 96 LIMITATIONS ON TRADEMARKS WILL COME INTO EFFECT STARTING IN 2025

Dental Trade Alliance members doing business in Quebec province likely are familiar with the many French language requirements associated with such trade. Those requirements became heightened by the passage of Bill 96 in 2022.

In a little over a year, however, more restrictions will be promulgated as the three-year implementation of Bill 96 continues. As of **June 1, 2025**, the following limitations covering **trademarks** will be enforced for those advertising products in Quebec:

1. *Non-French trademarks must be translated to French if not registered with Canada.* Prior to Bill 96, labelled products could have a trademark in another language without translation into French. After June 1, 2025, product labels with trademarks in another language will be required to have a French translation, unless a French version of the trademark is already on file with the Canadian Intellectual Property Office ("CIPO"). In the case of the latter, the registered, French version must be used.
2. *Non-French trademarks used on public signs and commercial advertising must be translated.* The same change described in point one will be implemented for non-French trademarks used on public signs and commercial advertising. If the trademark is not registered with CIBO, then a French translation is required. If the trademark is registered with CIBO, then the French version must be used.
3. *Non-French trademarks displayed on websites aimed towards Quebec customers must be translated if not registered with CIPO.* Under Bill 96, websites aimed at Quebec customers must be in French, but may be accompanied by a translation into another language if the French version is equally accessible. Non-French trademarks on such French language website, however, must be translated if not registered with CIPO, and if registered, then the French, registered version must be used.

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Another important change brought on by Bill 96 is in the **enforcement area**. Previously, the governmental agency tasked with enforcement of the Quebec French language laws, the Office Québécois de la Langue Française (“OQLF”), only interdicted against companies physically present in Quebec. However, the OQLF may now enforce against companies outside Quebec if they are selling non-compliant products into Quebec. Failure to comply with Bill 96 may result in fines ranging between \$700 CAD and \$30,000 CAD for a first infraction, and each day a company remains out of compliance will be considered another separate infraction. Corporate directors may be held personally responsible for violations if due diligence to comply cannot be demonstrated, and OQLF can seek the removal of offending products from the Quebec market via injunction.

Any questions can be directed to Rick Van Arnam, the Dental Trade Alliance’s regulatory affairs counsel, at rvanarnam@barnesrichardson.com.

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4350 N. Fairfax Drive, Suite 650, Arlington, VA 22203 | 703.379.7755 | dentaltradealliance.org