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RE: Nutrition Labelling Consultations

To the Bureau of Nutritional Sciences of the Food Directorate,

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) is writing to express support for Health Canada's move forward to make food labels more meaningful to Canadian consumers and more useful in public education. In addition to responding to the online survey, we have included our comments below.

OSNPPH is the independent and official voice of about 200 Registered Dietitians working in Ontario's public health system. OSNPPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents.

Health Canada has proposed a number of changes to the Nutrition Facts table (NfT) which OSNPPH encourages. OSNPPH supports:

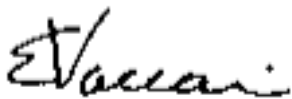
- Declaring the amounts of vitamins and minerals by weight and %DV
- Separate %DVs for trans and saturated fat
- Adding a footnote or statement to explain how to use %DV
- Requiring a consistent format for the list of ingredients
- Adding Vitamin D and Potassium as mandatory core nutrients
- Continuing to include calcium and iron as mandatory core nutrients
- The requirement to declare added sugars
- Requiring any ingredient added for sweetening purposes, even natural sugars (e.g. concentrated fruit juices, pures) to be included in the added sugars total
- Grouping sugar-based ingredients and sugar substitutes together in the list of ingredients.
- Improving nutrition label formatting by requiring the Ingredient List to be near the NfT or in a consistent spot on the package, to make it easier to find.

Health Canada has proposed a number of changes to the NFt that OSNPPH finds concerning/confusing. Below are our recommendations:

- Thick line on the NFt: While the concept of the thick line on the NFt is outlined well in *Health Canada's Proposed Changes to the Format Requirements for the Display of Nutrition and Other Information on Food Labels*, OSNPPH is concerned that grouping 'nutrients of public health concern' (to limit) above the thick line, and the other nutrients (to get enough of) below the thick line only perpetuates the idea of "bad" versus "good" nutrients. As well, placing Carbohydrates above the line could mislead the consumer into thinking it is also a nutrient to limit, which is counter to current health recommendations.
- Increasing font size for Calories: Type size helps to increase prominence and is helpful for those challenged with impaired vision or English literacy skills. However, having only Calories in a larger font size is not a helpful tool by itself. As public health nutrition professionals, we do not encourage perpetuating the concept that Calories are necessarily the most important information to consider when making healthy food choices. Rather, OSNPPH would encourage larger font size for the entire Nutrition Facts table, to accommodate the reading skills and capacity of all Canadians. These plain language formatting principles also align with the Accessibility for Ontarians with Disabilities Act.
- % Daily Values:
  - **Lack of % DV for Fibre.** OSNPPH feels Fibre is important for chronic disease prevention and should include a %DV, ideally for intact dietary fibre. It should also be kept as part of the Carbohydrate grouping.
  - **Sugars.** As Added Sugars, rather than naturally occurring sugars, are the greater public health concern, we would like to see a %DV for added sugars, while removing "Total Sugars" altogether from the NFt. Please note that any ingredient added for sweetening purposes, even natural sugars (e.g. concentrated fruit juices, purees) also be included in the added sugars total.
  - *Protein* should also include a %DV on the NFt. Nutrition Facts information is used in the curriculum, and is understood in terms of balanced macronutrient intake. Protein plays a major role in the body's metabolism and should be referenced accordingly.
  - OSNPPH would like to express *concern with establishing Daily Values for specific age groups*, and prefers the general population approach. This change may have the unintended consequence of prompting industry to use DV as a marketing tool, taking advantage of a new demographic, and increasing the marketing of food categories, when it is not appropriate to do so.
  - OSNPPH supports the separation of Trans Fat and Saturated Fat %DV, but questions using the upper limit for Trans Fat and all the nutrients of public health concern. This is misleading for consumers that the %DV for micronutrients represent targets to reach (e.g. calcium) while nutrients of public health concern (e.g. sodium) use Upper Limit or maximum values consumers should not exceed. OSNPPH would like to see the same use of AI /RDA for nutrients of public health concern.

- Vitamins on the NFt:
  - Although *Canada's Food Guide* and *Nutrition for Healthy Term Infants* describe Vitamin D needs in both micro grams (ug) and International Units (IU), many Vitamin D supplements (recommended for infants and seniors in the food guide) list only IUs. As such, OSNPPH feels it would be more relevant to the public if referenced in IUs instead of ug.
  - OSNPPH has concerns regarding Vitamins A and C being removed as mandatory core nutrients. Vitamin C is discussed in public health education, including its role in iron absorption, smoking cessation, family meal planning, etc. As well, not all populations are associated with adequate Vitamin A intake.
- Other Comments:
  - *Trans Fats*. With regard to Trans Fats, we have some concerns for those foods that contain naturally-occurring Trans Fats such as milk products. Naturally-occurring Trans Fat is metabolized differently in the body than processed Trans Fat, and as a result, OSNPPH suggests for consideration using the term 'hydrogenated' on the NFt instead of Trans Fat to distinguish natural versus processed Trans fat.
  - "*Additional Information*". OSNPPH encourages Health Canada to develop a mandatory position below the NFt for "Additional Information" that would provide information on added bioactives, such as caffeine, as currently required for energy drinks.
  - OSNPPH encourages Health Canada to consider also grouping sodium-containing ingredients and fat-containing ingredients, such as for sugar.

OSNPPH supports revising nutrition labelling as a population health strategy that will allow consumers to make informed choices more easily. We appreciate the opportunity to participate in this important consultation.



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