

OSNPPH Response: Toward Front-of-Package Nutrition Labels for Canadians

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Contact us

Attention: Front-of-package labelling consultation

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The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) is the independent and official voice of 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.

OSNPPH is pleased to have the opportunity to provide input on front-of-package nutrition labeling and further support Health Canada's commitment to make food labels more meaningful to Canadian consumers and more useful in public health education. OSNPPH is interested in front of package nutrition labels as part of a cohesive strategy of nutritional information on food labels that aligns with the proposed changes to nutrition labelling/nutrition facts table and ingredient listing initiatives being brought forward in Canadian Gazette Part II, as part of the Healthy Eating Strategy for Canada. Nutrition education is an integral part of public health's strategy to improve diet quality and prevent the risk of chronic disease in Canada.

1. Do you support Health Canada's proposed nutrient-specific "high-in" FOP labelling approach? Please explain.

Health Canada's proposed nutrient-specific "high-in" FOP labelling approach is a good alternative to a "low-in" one. Focusing on products that are high in targeted nutrients of public health concern plays to the strengths of applying a consistent measure of the relative amount of saturated fat, sodium and sugar across all or most product categories. Hopefully, this will encourage healthier food choices through simplicity, visual clarity and interpretive guidance and motivate food industry to reformulate their products to be healthier.

In addition, the proposed FOP labelling will complement the proposed changes to nutrition labelling currently being brought forward. Thus, this approach could better help Canadians identify nutrients of concern with their product purchase.

Mixed Messages

OSNPPH is concerned that highly processed, non-nutritive products such as diet pop or fat-reduced potato chips, or fruit juices sweetened with artificial sweetener may be depicted as a healthier choice. This creates confusion for the consumer instead of alleviating confusion by sending a mixed message.

Focus on only 3 nutrients

Nevertheless, while OSNPPH supports Health Canada's approach, there are many concerns that should be noted including the implications of focusing solely on these three nutrients. Foods are made up of more than three nutrients, and to better understand the nutritional value of a food item it is necessary to assess the whole food. The presence of fibre, for example, would not be highlighted through this FOP system. Fibre, similar to saturated fats, sugar, and salt, is a nutrient of concern for public health. If nutrients such as fibre are left out of this FOP system, then food items such as white bread and whole grain bread would be depicted as having the same nutritional value.

Other FOP labelling systems

Also, OSNPPH would encourage Health Canada to eliminate other food industry FOP labelling systems outside of the federal system to help simplify messaging to the consumer.

2.1a. Do you support Health Canada's proposed thresholds for triggering FOP labelling? Yes or no. Please explain.

Yes, OSNPPH supports Health Canada's proposed thresholds for triggering FOP labeling; thereby reinforcing an existing message and useful educational tool of the % Daily Value. OSNPPH believes that this is a logical and important way to ensure consistency and alignment with existing and new food and nutrition labeling regulations.

%DV values for Sodium and Sugar

That being said, we have concern related to how the %DV is established for each nutrient. For example, nutrients, such as sodium, use the Total Upper Limit as the reference value for the Nutrition Facts Table (2,300 mg/day) whereas Health Canada recommends that most Canadians aim for 1,200-1,500 mg/day. This discrepancy in the values used could lead to the Nutrition Facts Table and the FOP underestimating the %DV for sodium in foods per reference amount and have the unintended consequence of promoting some foods as healthier, such as potato chips which may not trigger the FOP for sodium. This issue applies similarly to sugar, where the proposed value is higher than the recommendations from the World Health Organization. As such we would encourage Health Canada to take the time and diligence required to update the reference values used based on latest evidence and assess using calculations that are related to the new reference amounts as outlined in Canada Gazette, Part II.

Saturated Fat

With regards to the thresholds for saturated fats, OSNPPH would recommend that an exception list be thoroughly explored to avoid whole food items such as whole milk and certain types of cheeses from carrying an FOP label.

2.2a. Do you support Health Canada's proposed approach for foods with small reference amounts? Yes or no. Please explain.

Yes, OSNPPH supports Health Canada's proposed approach for foods with small reference amounts. It provides an added education opportunity for consumers.

2.3a. Do you support Health Canada's proposed approach to exempt foods from FOP labelling if the current Food and Drug Regulations do not require the food to carry a Nutrition Facts table? Please explain.

Yes, OSNPPH supports Health Canada's proposed approach. FOP labelling is an interpretative tool designed to work alongside the Nutrition Facts Table, as such, it may mislead consumers to have an FOP label without further nutrition information. Further, we also encourage Health Canada to address the issue of unlabeled products found within the grocery deli, bakery and quick serve stations that are prepared commercially with standardized recipes and ingredients. Given that Health Canada is undertaking the task of regulatory changes on nutrition labelling, extending the Nutrition Facts table and FOP labeling to these products should also materialize.

2.3b. Do you support Health Canada's proposal to exempt packages of sugar and salt from FOP labelling? Please explain.

OSNPPH agrees with the proposed approach to exemptions for reasons of readability. However, given that sugar and sodium are nutrients of concern, an alternative approach to communicate nutrition messaging should be investigated, especially for individual packets of salt and sugar.

3a. Do you support Health Canada's approach to choosing a FOP symbol for foods high in sodium, sugars and saturated fat? Please explain.

Yes, OSNPPH supports Health Canada's approach to choosing a FOP symbol. The FOP symbols will provide targeted information related to saturated fat, sodium and sugars and help facilitate consumers' comparisons of nutritional value within food categories and across other food products.

Focus Testing

Conducting focus groups with a variety of participants will help ensure that the symbols are meaningful and easily understandable for consumers. Using simple FOP symbols or pictures to summarize complex information about product quality may be especially valuable to low-literacy populations.

3b. Which symbol shown in Figure 1 would best help inform Canadians about foods high in sodium, sugars, and saturated fat? Please explain.

While OSNPPH appreciates the simplicity of the symbols, we have some general suggestions to take into consideration. We believe that the symbol should have pictures in order to be accessible to people of all literacy levels. The picture should be easily understood, unlike the suggestions from option ii. The images of the sugar cube and fat droplet may not be instantly understood without the identifiers below. Overall, OSNPPH recommends that Health Canada utilize a wide range of consumer-focused research, evidence, and care in the selection of a FOP symbol to ensure that it is eye catching and conveys the appropriate information to consumers in the most simplified manner.

3c. If you do not agree that any of the symbols in Figure 1 would help inform Canadians, please propose an alternative symbol along with a rationale.

4a. Do you support the changes proposed to update claims and other nutrition-related statements described in Table 3? Please explain.

OSNPPH is uncertain of some of the proposed claims update. We feel it is important that the claim updates must always ensure consistency between the Nutrition Facts Table as well as the FOP and be clear to consumer understanding.

4b. If you do not support one or more of the proposed changes, please identify the subject of the proposed change (e.g. "no added sugar" claim) and explain why, along with a rationale and evidence to support your comments.

OSNPPH believes that some of the claims regarding sugar content can be misleading to consumers. Without the added context and explanation of the claim, it can be hard for consumers to discern the differences between these claims. Specifically the change to "low in energy" and "lightly sweetened" claims. We question the necessity of these claims, other than to appease commercial food marketing. Certainly, if the "free of sugars" or "low in energy" is used, and the declaration of sweeteners is not displayed on the front panel as proposed, the Canadian consumer could be easily misled in their purchase.

That is to say, with the introduction of these claims, OSNPPH fears that the industry is being encouraged to use non-food ingredients such as artificial sweeteners or reformulations using synthetic sugar substitutes. This can further perpetuate the availability of processed, minimally nutritious foods.

5a. Do you support the changes proposed to eliminate the requirements for the principal display panel declaration and the quantitative declaration on foods containing sucralose, acesulfame-potassium and neotame? Yes or no. Please explain.

OSNPPH does not support the proposed changes regarding the sweeteners listed. The changes do not benefit consumers; instead it benefits the industry. As registered health professionals that deal directly with consumers, the rationale for these changes is a challenge to explain to our clients. We are also concerned with how these changes can mislead consumers. For example, a product that has been artificially sweetened would qualify for a nutrient content claim at the FOP label, but would not make it easy for consumers to know that the product has artificial sweeteners. Having artificial sweeteners only on the ingredients listing will not be sufficient when promoting interpretive FOP symbols and claims information on the front of a packaged food.

In addition, OSNPPH is encouraging Health Canada to further explain why the requirements only apply to the four high-intensity sweeteners listed.

5b. If your answer to 5a. is “no”, please provide your recommended approach along with a rationale and evidence to support your proposal.

In a national survey carried out in France, Germany, Poland, Sweden, Hungary and the UK, it was found that two thirds of shoppers were observed looking at the front of the package in the supermarket, while less than 15 percent were looking elsewhere on the pack (Storcksdieck Genannt Bonsmann & Wills, 2012). Thus, the FOP system should convey clear messages to consumers, instead of expecting them to rely on information posted elsewhere on the package (i.e., ingredient list).

OSNPPH does not support the proposed changes and, instead, supports a system where it is easy for consumers to know that products are artificially sweetened.

5c. If you are someone who either has PKU, cares for someone with PKU, or provides dietetic advice to those with PKU, what are your views concerning the principal display panel and quantitative declaration labelling requirements for aspartame?

A declaration that a food item contains aspartame (including quantity) should be required on the principal display panel. Individuals with PKU, especially children, need this information to be easily accessible and available.

References:

- 1) Storcksdieck Genannt Bonsmann, S., & Wills, J. M. (2012). Nutrition Labeling to Prevent Obesity: Reviewing the Evidence from Europe. *Current Obesity Reports*, 1(3), 134–140. <https://doi.org/10.1007/s13679-012-0020-0>
- 2) Institute of Medicine of the National Academies, Front of Package Nutrition Rating Systems and Symbols Promoting Healthier Choices, 2011. www.iom.edu. Last viewed on December 20, 2016.