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Healthy Dietary Choices for Children: A comparison of company developed standards for 'healthy dietary choices' to standards used in public health

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In Canada, there is no defined standard for what constitutes a healthy food choice. To help consumers choose healthy foods, a variety of standards have been developed by food manufacturers for their own products as well as by independent nutrition experts, public health nutrition professionals and non-governmental organizations (NGOs).

Several food and beverage companies that have developed their own standards for a healthy dietary choice participate in the Children’s Food and Beverage Advertising Initiative (CFBAI). Companies participating in CFBAI commit to promoting their products to Canadian children in a responsible way to help them make wise decisions about healthy dietary choices and healthy lifestyles. Companies can demonstrate their commitment by emphasizing healthy dietary food choices when advertising to children under 12 years old or by not advertising their products to children under 12. Foods advertised to children that are defined as ‘healthy dietary choices’ based on company developed definitions often do not meet the definition of ‘healthy’ based on standards developed by groups outside the food manufacturing industry. Company developed standards were compared to definitions developed by groups outside the food manufacturing industry to find similarities and differences. Appendix A provides a comparison chart of Selected Participant Commitments of the Canadian Children’s Food and Beverage Advertising Initiative to Existing Public Health, Government or Non-Governmental Organization Nutrition Standards in Ontario

Products compared

Cereal products advertised to children and defined as healthy dietary choices based on the company developed definitions of Kellogg’s and General Mills were compared to the standards developed by groups outside the food manufacturing industry and commonly used by public health nutrition professionals to help assess if a food would be considered a healthy choice for children (and adults). In addition, beverages made by Coca-Cola Ltd. that qualify to be advertised to children under 12 were compared to these standards. Specifically, comparisons were made to standards set out in Nutrition Tools for Schools (NTS), Ontario Ministry of Child and Youth Services (MCYS) Student Nutrition Program Nutrition Guidelines, Ministry of Education Recommended Standards for Foods and Beverages Sold in Elementary School Vending Machines, Bill 8: Healthy Food for Healthy Schools Act, 2008, Heart and Stroke Foundation Health Check Program.

Kellogg's and General Mills

Scientific and government standards used to develop 'healthy' food choice definitions

The 'healthy dietary choice' definitions developed by Kellogg's and General Mills are based on current evidence and government standards and are the same sources of information used by groups outside the food industry to develop the definitions cited by public health nutrition professionals. The evidence and government standards used include Canada's Food Guide (CFG), Canadian Food Inspection Agency (CFIA) Guide to Food Labelling and Advertising and Institute of Medicine (IOM) Dietary Reference Intakes.

Findings

The standards set by Kellogg's, General Mills and the non-food manufacturing groups are based on specific nutrition criteria. None of the standards, company developed or not, are exactly the same. However, all standards (except Bill 8 which refers to trans fat only) include limits for the amount of saturated fat, trans fat and sodium. Comparisons for Kellogg's, General Mills and non-food manufacturing groups are described here.

Fat

All groups place similar limits on the amount of saturated fat and trans fat allowed in one serving of the product. For example, General Mills and NTS set a limit of ≤ 2 g saturated + trans fat; Kellogg's and MCYS set a limit of ≤ 2 g saturated fat + 0 trans fat; Bill 8 and Heart and Stroke Foundation of Ontario (HSFO) Health Check limit trans fat to $\leq 5\%$ of total fat.

Sodium

All groups place limits on the amount of sodium as part of the criteria for a healthy food choice but the limits vary. Kellogg's and General Mills limit the amount of sodium in a serving of cereals (and snacks) to ≤ 230 mg sodium; NTS and MCYS describe the sodium limit as the CFG recommendation 'low in salt'; HSFO Health Check set the sodium limit at ≤ 480 mg.

Sugar

Most standards include a limit for the amount of sugar allowed in one serving of the product as part of the criteria to define a food as a healthy choice. The amounts allowed vary and some are dependent on other criteria such as the serving size and the amount of other nutrients in the product. The Kellogg's standard allows the most amount of sugar in one serving and sets the limit at ≤ 12 g. The MCYS criteria for sugar is described as the CFG recommendation for 'low in sugar'; NTS sets a limit of ≤ 4 g of sugar per serving in addition to meeting other criteria; HSFO Health Check requires ≤ 6 g sugar in a 30 g serving of cereal except if fibre exceeds 4 g/serving and ≤ 11 g sugar in a 55 g serving except if fibre is 6 g or more in a 55 g serving. General Mills does not include a limit on sugar as part of the criteria for a healthy food choice.

Fibre

NTS, MCYS and HSFO Health Check include a minimum amount of fibre (≥ 2 g fibre/serving) as part of the criteria for determining if a food is a healthy choice. Kellogg's does not include fibre as part of their criteria. General Mills states that the product must have a minimum of 2 grams fibre or a minimum of 5% of at least one of the following: vitamin A, vitamin C, calcium or iron.

Vitamins and Minerals

NTS, MCYS Guidelines and General Mills are the only guidelines that include vitamins and/or minerals in their criteria. NTS guidelines state that a cereal must have $\geq 25\%$ DV for iron (in addition to other criteria) to be a cereal with maximum nutritional value. Cereals considered moderate nutritional value have at least 5% DV for iron along with other criteria. MCYS guidelines set a minimum of 5% DV for iron. General Mills states that the product must have a minimum of 2 grams fibre or a minimum of 5% of at least one of the following: vitamin A, vitamin C, calcium or iron.

Other Criteria: cholesterol, whole grains, calories/serving

General Mills includes cholesterol as part of their criteria and sets a maximum allowable amount at 60 mg cholesterol per serving. Whole grain as the first ingredient is part of the criteria to meet the NTS standard for a cereal of maximum nutritional value. General Mills and Kellogg's set limits on the amount of calories in one serving of a cereal. For General Mills, one serving cannot exceed 175 calories and for Kellogg's, one serving cannot have more than 200 calories.

Comments/Observations

- All the standards place similar restrictions on the amount of fat and sodium that can be in a product in order for it to be a healthy choice.
- Sugar and fibre are also included in the criteria for a healthy food choice in some of the food industry developed standards and non-food manufacturing groups.
- The sugar and fibre criteria set by the food industry are not as restrictive as the limits set for these criteria by non-food manufacturing groups. The Kellogg's standard for sugar allows a product to have two to three times the amount of sugar that non-food manufacturing standards allow. General Mills does not include sugar as part of the criteria to define a healthy food choice.
- The generous amount of sugar and minimal amount of fibre in food industry developed standards mean that none of the cereals that Kelloggs and General Mills classify as a healthy dietary choice meet any of the non-food manufacturing standards. In other words, none of the 5 Kellogg's cereals and 7 General Mills cereals that these companies can advertise to children as a healthy dietary choice based on company developed standards meets the healthy choice standard of NTS, MCYS, and HSFO Health Check.
- None of the 5 Kellogg's cereals or 7 General Mills cereals that these companies can advertise as a healthy dietary choice could be offered to children in an MCYS funded school breakfast or snack program. In addition, schools that choose foods with maximum or moderate nutritional value based on NTS criteria would not have these cereals available to students.

General Mills includes a minimum of 5% Daily Value of vitamin A or vitamin C or calcium or iron or 2 g fibre as part of the criteria for a healthy food choice. These nutrients are important for good health, however, products that have 5% vitamin A, C or calcium or iron indicate a “small amount” of the particular nutrient. Consumers can use % Daily Value on a food label to quickly assess if the nutrients they are trying to increase have higher percentages, and those that they are trying to decrease have lower percentages.

Health Canada labeling regulations provide more specific criteria for nutrition claims, such as "low" in a nutrient or "high" in a nutrient. These criteria vary depending on the nutrient

Coca-Cola Canada

Coca-Cola’s commitment under the Canadian Children’s Food and Beverage Advertising Initiative is to not direct advertising to children under 12 years old. However, under the CFBAI, many Coca-Cola Ltd beverages qualify to be featured on television, radio, print and interactive media aimed at children less than 12 years old. The beverage categories that can be advertised to children under 12 include water, juice, dairy, and beverages fortified to address children’s nutritional gaps.

Nine Coca-Cola products were compared to the non-food industry developed standards for a healthy food choice. All nine products met the Bill 8 standard. This standard relates to trans fat in foods and none of the beverages contain trans fat. Bottled water met the Ministry of Education parts per million (PPM) standards. The other standards do not make reference to bottled water. None of the other eight beverages met any of the non-food manufacturing standards for a variety of reasons: the product has a larger than recommended serving size; the product has added sugar; and, the product is not 100% juice.

Comments/Observations

- None of the nine Coca-Cola beverages that can be advertised to children less than 12 years old could be offered to children in an MCYS funded school breakfast or snack program. In addition, schools that choose foods with maximum or moderate nutritional value based on NTS criteria would not have these beverages available to students.

Recommendations for defining healthy food choices

It is recognized that setting standards for defining what constitutes a healthy food choice is challenging. Nutrition professionals would need to factor into this definition what nutrients the particular food would need to naturally contain as well as what should be in that particular food in a limited amount. To this end, it is key to promote foods that are as close to their natural state (i.e., unprocessed state) as possible. It is unknown specifically how nutrients from foods in their whole state benefit health rather than nutrients from various sources being combined together unnaturally. However, science does support that nutrients from foods in their whole states work synergistically to provide more overall health benefits.

A food with added nutrients to enhance its nutritional value should not be considered a healthy choice. Nutrition experts would challenge the notion that chocolate bars, potato chips, fruit roll up snacks, and carbonated beverages are “healthy choices” when they have been fortified with vitamins, minerals, or other ingredients or components identified as healthy.

It is strongly recommended that standards would be set by an independent group of nutrition experts who would be endorsed, adopted, and enforced by the government. With this process in place, the food industry and non-food manufacturing groups would be required to apply the same definition of “healthy” to their food and beverage products. This process also ensures the consumers’ best interests are the priority so as to facilitate the consumers’ ability to make an informed and unbiased choice.

Appendix A: Comparison of Selected [Participant Commitments](#) of the [Canadian Children's Food and Beverage Advertising Initiative](#) to Existing Public Health, Government or Non-Governmental Organization Nutrition Standards in Ontario.

Food Company Advertising Standards	Existing Government/NGO or Public Health Nutrition Standards in Ontario				Overall Assessment* ✓ or ✕
	Nutrition Tools For Schools® (OSNPPH) http://nutritiontoolsforschools.wetpaint.com	Bill 8: Healthy Food for Healthy Schools Act, 2008 (Education Act) ¹	Nutrition Guidelines for Student Nutrition Programs (Ministry of Children and Youth Services) ²	Health Check Nutrition Criteria – Grocery (Heart & Stroke Foundation) ³	Ministry of Education PPM 135 (Vending Machine Standards) ⁴ No guidelines for cereals
Kellogg's Ready-to-eat cereals currently advertised to kids 6-11 that meet their criteria					
Crispix Krispies	✕ Does not meet fibre rec'n	✓	✕ Does not meet fibre rec'n	✕ Does not meet fibre rec'n	✕
Corn Pops	✕ Does not meet sugar and fibre rec'n	✓	✕ Does not meet fibre rec'n	✕ Does not meet sugar and fibre rec'n	✕
Froot Loops	✕ Does not meet sugar and fibre rec'n	✓	✕ Does not meet fibre rec'n	✕ Does not meet sugar and fibre rec'n	✕
Froot Loops Smoothie	✕ Does not meet sugar and fibre rec'n	✓	✓	✕ Does not meet sugar and fibre rec'n	✕

Kellogg's Frosted Flakes	Does not meet sugar and fibre rec'n	✓	✓	Does not meet sugar and fibre rec'n	×	×
Coca Cola Products						
Dasani Water	No reference to bottled water	✓	No reference to bottled water but tap water must be available at sites	Not included in food categories	✓	
Dasani Flavours (flavoured waters)	✗ only 100 % juice acceptable	✓ No trans fat	✗ only 100 % juice acceptable	✗ only 100 % juice acceptable	✗ only 100 % juice acceptable	✗ Product is not 100 % juice and contains added sugar
Minute Maid (orange juice and apple juice 100% - 341 ml container)	✗ Exceeds 125 ml recommended serving size	✓ No trans fat	✗ Exceed 125 ml recommended serving size	✗ Exceeds 250 ml recommended serving size	✗ Exceeds 125 ml – 250 ml recommended serving size	✗ Product exceeds recommended serving size
Fruitopia	✗ Only 100 % juice acceptable	✓ No trans fat	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Product is not 100 % juice and contains added sugar
Hi-C	✗ Only 100 % juice acceptable	✓ No trans fat	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Product is not 100 % juice and contains added sugar
Five Alive	✗ Only 100 % juice acceptable	✓ No trans fat	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Only 100 % juice acceptable	✗ Product is not 100 % juice and

									contains added sugar			
Powerade			✓		✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Product is not 100 % juice and contains added sugar etc.
Full Throttle energy drink			✓		✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Product is not 100 % juice and contains added sugar, caffeine etc.
			✓		✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Only 100 % juice acceptable	✖	Product is not 100 % juice and contains added sugar & caffeine
General Mills ready-to-eat cereals currently advertised to kids 6-11 that meet their criteria												
Nestle Nesquick		✖	✓		✖	Does not meet fibre rec'n, high in sugar Min Nut Value	✖	Does not meet fibre rec'n	✖	Does not meet fibre rec'n	✖	
Cinnamon Toast Crunch		✖	✓		✖	Does not meet fibre rec'n, high in sugar Min Nut Value	✖	Does not meet fibre rec'n	✖	Does not meet fibre rec'n	✖	
Reese Puffs		✖	✓		✖	Does not meet fibre rec'n, high in	✖	Does not meet low fat rec'n, nor fibre	✖	Does not meet low fat rec'n, nor fibre	✖	

	sugar Min Nut Value		rec'n	rec'n	rec'n	
Honey Nut Cheerios	x Does not meet fibre rec'n, high in sugar Min Nut Value	✓	✓	✓	✓	✓
Lucky Charms	x Does not meet fibre rec'n, high in sugar Min Nut Value	✓	x Does not meet fibre rec'n	x Does not meet fibre rec'n	x Does not meet fibre rec'n	x
Chocolate Lucky Charms	x Does not meet fibre rec'n, high in sugar Min Nut Value	✓	x Does not meet fibre rec'n	x Does not meet fibre rec'n	x Does not meet fibre rec'n	x
Fruity Cheerios	x Does not meet fibre rec'n, high in sugar Min Nut Value	✓	✓	✓	✓	✓
General Mills fruit-type snacks currently advertised to kids 6-11 that meet their criteria						
Fruit Gushers	x Fruit is first ingredient however, contains added sugar Min Nut Value	✓	x Fruit is first ingredient however, contains added sugar	x Fruit is first ingredient however, contains added sugar	x Does not meet good source of Vit C rec'n, nor fibre rec'n	x No significant nutrients and low in fibre
Fruit by the Foot	x Fruit is first ingredient however, contains	✓ No trans fat	x Fruit is first ingredient however, contains	x Fruit is first ingredient however, contains	x Does not meet good source of Vit C rec'n, nor fibre	x No significant nutrients and low in fibre

	added sugar Min Nut Value		added sugar	added sugar	rec'n	
Fruit Shapes	x Fruit juice is first ingredient however, contains added sugar Min Nut Value	✓ No trans fat	x Fruit is first ingredient however, contains added sugar	x Fruit is first ingredient however, contains added sugar	x Does not meet good source of Vit C rec'n, nor fibre rec'n	x No significant nutrients and low in fibre
Fruit Roll-Ups	x Fruit is first ingredient however, contains added sugar Min Nut Value	✓ No trans fat	x Fruit is first ingredient however, contains added sugar	x Fruit is first ingredient however, contains added sugar	x Does not meet good source of Vit C rec'n, nor fibre rec'n	x No significant nutrients and low in fibre
General Mills baked good type snacks currently advertised to kids 6-11 that meet their criteria						
Dunkaroos Cookies n Creme	x 19% total calories from Sat + Trans, low in fibre recdn Min Nut Value	x Trans fat from hydrogenated vegetable oil.	x Contains trans fat from hydrogenated vegetable oil, does not meet fibre rec'n	x Not a source of fibre	x Does not meet low fat rec'n, nor low is sat fat rec'n	x Contains trans fat, not low in sat fat, not a source of fibre
Dunkaroos Chocolatey Chip	x Less than 2g fibre recdn, does not meet %5 iron Min Nut Value	x Trans fat from hydrogenated vegetable oil.	x Contains trans fat from hydrogenated vegetable oil, does not meet fibre rec'n	x Not a source of fibre	x Does not meet low fat rec'n	x Contains trans fat, not low in sat fat, not a source of fibre
Dunkaroos Cinnamon Graham Cookies	x Less than 2g fibre recdn, does not meet %5 iron	x Trans fat from hydrogenated vegetable oil.	x Contains trans fat from hydrogenated	x Not a source of fibre	x Does not meet low fat rec'n	x Contains trans fat and not a source of fibre

	Min Nut Value		vegetable oil, does not meet fibre rec'n			

*✓ indicates the food company standard meets ALL public health, NGO or government standards. ✕ indicates the food company standard does not meet ALL public health or government standards.

¹ <http://www.canlii.org/on/laws/regu/2008r.200/20080716/whole.html>

² <http://www.gov.on.ca/children/graphics/255363.pdf>

³ www.healthcheck.org

⁴ <http://www.edu.gov.on.ca/extra/eng/ppm/135.html>

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