

“Proposed front-of-package nutrition labelling”

Updated January 2, 2017

Background

Health Canada is proposing mandatory front-of-package labelling for foods high in nutrients of public health concern including sugars. Honey is included in the sugar category. As currently proposed, single ingredient honey packaging would require a “high in sugar” front of package label. The proposed changes could have serious impact on the consumption of honey in Canada; as well as on fruit, vegetable and oilseed production in Canada. The Canadian honey industry wishes to raise key points on the impact of the proposed changes as part of the consultation process.

DRAFT Key Issues and related messages

Issue	Key point	Support Points	Advice to Health Canada
Labelling honey for saturated fat content is misleading	Single macronutrient products like honey should be exempt from front of label warnings. It is misleading to indicate saturated fat for a food that has never contained these macronutrients	<p>Subsection 5(1) of the <i>Food and Drugs Act</i> states:</p> <p><i>No person shall label, package, treat, process, sell or advertise any food in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.</i></p> <p>Requiring a saturated fat content front of package indicator creates the erroneous impression that honey contains these components.</p>	Exempt single ingredient: single macronutrient labels from front of label warning to avoid confusing consumers.

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<p>Proposed 100 gm daily value for sugars is arbitrary and not science-based ((TBC-regulatory status of this proposed change))</p>	<p>Current %DV for honey based on a 2-tsp serving size for honey is long standing and familiar to consumers. Prior consultation proposed an arbitrary level of 100 gm as a DV for all sugars including honey. More research needs to be done to determine the relevant %DV for sugars in the Canadian diet</p>	<ul style="list-style-type: none"> • Erickson et al (2016) conducted a systematic review of 9 public health guidelines regarding sugar intake. Their review indicated current guidelines on dietary sugar were based on low quality evidence. The authors cautioned the guidelines did not meet the criteria for trustworthy recommendations. • Recommendations for quantitative sugar intake as part of a healthy diet were based on subjective diet modelling and food intake surveys. The WHO studies used incidence of dental caries and weight gain as a proxy for general health outcomes. • Robust clinical 	<p>Continue to use existing %DV for honey until quantitative research is completed on the role of sugar and population health</p>

		evaluation sugar intake, excess calorie consumption and nutrient displacement are required before a %DV can be established	
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<p>Labelling honey as a source of sugar only ignores the health-related nutrients not present in other sugar sources</p>	<p>The proposed changes make allowance for a different approach for products in a nutrient category that would be a healthier choice (ie identification of saturated fat oils vs other fats). Much like dietary fats are not all equal, honey offers health related benefits not present in other sugar sources</p>	<ul style="list-style-type: none"> • Honey comes from natural plant nectars and contains vitamin B6, thiamin, niacin, riboflavin, pantothenic acid and certain amino acids. It also is a source of essential minerals including calcium, copper, iron, magnesium, manganese, phosphorus, potassium, sodium and zinc (Health Canada, 2016) • Canadians 	<p>Education campaign focused on attributes in honey beyond sugar content</p>

		<p>consumed 33.46 kgs of total sugars and syrups in 2009- less than 1 kg of that amount was from honey (Statistics Canada, 2009)</p>	
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<p>Reduced honey consumption and resulting reduction in pollinator activity will have a significant negative impact on production of fruit, nut, vegetables and oilseeds and therefore health of Canadians</p>	<p>Honey bee activity is crucial to the successful production of many nutrient rich food products (berries, fruits, vegetables, oilseeds). The sale of honey supports this pollination service. Actions that may reduce/suppress the financial viability of the honey industry must recognize the threat such actions have on the availability of a broad range of nutrient rich food products for Canadians.</p>	<ul style="list-style-type: none"> • Bees are critical pollinators of important crops including canola, soybeans, blueberries, apples, cranberries and carrots (Statistics Canada, 2014) • More than \$10 billion dollars of bee pollinated crops were sold by Canadian farmers in 2014. 	<p>Request an “Indication of business impact” assessment be conducted before applying proposed changes to honey products.</p>