

Technical questionnaire on front-of-package nutrition labels

which of the following best describes you?

non-government organization representative

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

No.

The proposed front-of-package (FOP) labels should more clearly state that it is to be only used in multi-ingredient foods. Single ingredient, single macronutrient foods, such as honey, should be exempt as the information is duplicated on the ingredient label. We recommend Health Canada focus front-of-package introductions on multi-ingredient foods containing all the target nutrients- saturated fat, sodium and sugars.

The proposed front-of-package symbols have the potential to add even more confusion regarding food choices for consumers. The current nutrition facts tables and ingredient listings clearly indicate the information required to make informed choice. Health Canada should devote more time and resources on what is already on labels instead of adding even more information that requires additional explanation.

We also object to the use of subjective terms such as 'high-in' as they do little to inform consumers on how to evaluate between products.

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

No. The proposed thresholds are based on qualitative food intake survey results and not quantitative clinical data linking consumption levels with health impact. We propose Health Canada maintain current %Daily Values until peer reviewed clinical evidence exists to guide the establishment of thresholds. We reference the concerns raised by Erickson et al (2016) regarding the use of low-quality evidence used in the development of dietary guidelines.¹

2.1b. If your answer to 2.1a is "no", please suggest alternative thresholds along with a rationale and evidence to support your proposal.

We propose Health Canada maintain current thresholds until quantitative clinical evidence supports changes.

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

¹ Erickson, J; Behnam, S; Lytvyn, L; Slavin, J and Johnston, BC. 2016. "The scientific basis of guideline recommendation on sugar intake" Annals of Internal Medicine Vol 166, No 4.

No as currently worded. Consideration should be given to the role of different sources of target nutrients in contributing to a healthy diet. For example, the technical document draws a clear distinction between source materials containing fats by suggesting not all fats are equal. We believe the vitamins and minerals in honey offer parallel benefits in that natural sugars should not be viewed the same as refined sugar when determining a trigger for FOP labelling.

2.2b If your answer to 2.2a is "no", please suggest an alternative approach along with a rationale and evidence to support your proposal.

FOP labelling requirement should only apply to multi-ingredient foods.

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

((need guidance from CHC re answering))

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

Yes.

We would request the proposal make a clear distinction between single ingredient vs multi-ingredient foods and exempt single ingredient, single macronutrient foods like honey from the repetitiveness of FOP labelling.

We also believe the symbols will require manufacturers to erroneously indicate presence of saturated fat in products that do not contain any fat. The potential to mislead and confuse consumers can be removed by exempting single ingredient, single macronutrient foods.

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

No

The use of subjective terms on a mandated label requirement is not supportable.

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

The symbols warn without informing. The use of subjective terms and symbols does little to empower consumers to make choices between products.

Considerable consumer education will be required to inform consumers about how the symbols guide product choice. A better investment in time and resources would be realized by informing Canadians on how the current nutrition facts table and ingredient lists provide the necessary information to make informed choices between food products.

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.

We see no need for FOP symbols.

The current nutrition facts tables and ingredient listings clearly indicate the information required to make informed choice. Adding additional and subjective information does little to inform consumers to make informed choices between food products.

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

((need guidance from CHC re answering))

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

((need guidance from CHC re answering))

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.

((need guidance from CHC re answering))

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

5c.If you are someone who either has phenylketonuria (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?