

BRIEFING NOTE

Mandatory Front-of-Package (FOP) Labelling for Foods

INTRODUCTION

On February 10, 2018, regulations amending the Food and Drug Regulations (Nutrition Symbols, Other Labelling Provisions, Partially Hydrogenated Oils and Vitamin D) were posted in Canada Gazette Part I. These regulations are part of the government's Healthy Eating Strategy which also includes revising Canada's Food Guide and restrictions on marketing food and beverages to children.

Public consultations on the FOP labelling are open until April 26, 2018 for Canadians to weigh in on which front-of-package nutrition symbol they will find most useful. Canada Beef's submission on the FOP symbol is detailed in the Appendix of this document.

NUTRIENTS OF CONCERN

Health Canada states saturated fat, sodium and sugars are nutrients of concern based on association with chronic diseases such as diabetes for example. Dietary survey data indicates that Canadians consume these nutrients in excess of recommended limits. The World Health Organization recommends that saturated fat intake not exceed 10% of total energy intake, which is approximately 20 grams per day for a 2000 calorie reference diet.

THRESHOLDS FOR FOP LABELS

FOP labelling will be triggered if the saturated fat, sodium and/or sugars in prepackaged foods represent 15% of the daily value (DV) per reference amount. For example, for ground beef, the amount of saturated fat listed will be based on 125 grams raw ground beef. If the amount of saturated fat in the 125 grams raw exceeds 3 grams, then a FOP label would be required, according to the Health Canada proposal.

Reference Amounts for FOP Labels Thresholdsⁱⁱ

Meat Category	Reference Amount ¹	15% DV threshold
Ground beef, raw	125 grams	3 grams saturated fat 350 mg sodium 15 grams sugars
Deli meats – fully cooked	55 grams	
Uncooked sausage	75 grams	
Fully cooked sausage	55 grams	

¹reference amounts in Schedule M of the Food and Drug Regulations

EXEMPTIONS FROM FOP LABELLING

The proposed changes to the Food and Drug Regulations do not require single-ingredient foods, like meat, poultry, fish, vegetables and fruit, to carry a Nutrition Facts table. These foods remain exempt; therefore, are excluded from FOP labelling. However, as is currently in the regulations, all ground meats – beef, chicken, turkey, veal, and pork – require a Nutrition Facts table. Ground beef will require a FOP label for saturated fat.

PROPOSED FOP SYMBOLS

Progress has been made in tempering the fear-mongering visuals of the initial 'skull & bone' and 'stop sign' suggestions. The proposed FOP symbols are:



These symbols are not currently in the regulations however, the nutrition symbol chosen as a result of the online consultation process will be included in the final Regulation that will be published in Canada Gazette, Part II, and will be inserted directly in the *Food and Drug Regulations*.

Health Canada states the estimated Canadian population average intake of saturated fat is approximately 10% of energy (20 grams). Based on Canadian consumption patterns, it would appear that saturated fat should not fall into the category of 'nutrients of concern'.

Of concern is these nutrients were identified based on an analysis of the 2004 Canadian Community Health Survey data; not the most recent iteration in 2015. This is important since dietary patterns have changed since 2004. Saturated fat consumption may be less than previously understood, which questions the validity of being identified as a nutrient of concern. Furthermore, the science around saturated fat and health outcomes has evolved. Heart and Stroke Canada has taken a new position on saturated fat stating "...recommendations do not include a threshold or limit for saturated fat and instead focus on a healthy balanced dietary pattern, which can help Canadians reduce consumption of saturated fats", with a focus on a variety of minimally processed foods, which include lean meats.

SUMMARY

Government policy should be developed using the most current consumption data and science available.

The objective to provide quick and easy guidance to encourage consumers to make informed choices, while well-intended, is not achieved in this proposed policy. In fact, some nutrient-poor and highly processed foods would not have to display a FOP label since they do not meet the thresholds for sodium, saturated fat and sugar like some cookies, chips and diet soda.

On the other hand, many wholesome, nutritious foods, like ground beef, are above the thresholds for these nutrients and would have to display one. It is a negative approach to dealing with foods that are meant to nourish.

Appendix:

Canada Beef reply to Health Canada's Front of Pack Label Public Consultation

https://www.healthyeatingconsultations.ca/front-of-package?utm_source=ehq_newsletter&utm_medium=email&utm_campaign=ehq-Health-Canada%E2%80%99s-Food-Front-of-Package-Nutrition-Symbol-Consultation-&utm_campaign=website&utm_source=ehq&utm_medium=email

Submitted by Canada Beef February 14 2018

Process:

- 4 images are presented and you are asked to pick which of the 4 you would prefer to see on pack – you are not given the option to pick NONE and you cannot skip the question.
- You are then asked to explain your preference from a selection of 4 options – of note, you are not allowed to give a comment. You can select more than 1 reason.



Response:

The image with the magnifying glass was selected as it at least demonstrates one should consider the nutrient in question marked on the label and seems to be less of a 'warning' label. It encourages consideration and thoughtfulness – not dismissal and warning.

Response Submitted in the Comment Box:

"We should stop villainizing foods based on single nutrients and labelling them with Warning Signs is not going to make a difference to health. The single nutrient focus of nutrition messages in the past has only served to distract us from this far more important issue – we have faulty eating patterns of snacking instead of meals, eating alone, eating on the run, eating portions that are super-sized and skipping meals (like breakfast). We have become over reliant on over-processed foods, with close to 50% of calories for Canadians coming from these foods (according to studies cited by Heart & Stroke). Encouraging and enabling Canadians to cook meals at home with our basic wholesome foods in proper proportions would be a better strategy than nutrient warning labels – nutrient contributions of the food as a whole should be the consideration and healthier eating patterns."

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