CONSULTING CANADIANS TO MODERNIZE AND IMPROVE FOOD LABELS

WHAT WE HEARD
This document presents an overview of input received in response to several in-person and online consultations and round tables held by the Canadian Food Inspection Agency, Health Canada and the Minister of Health between June 2013 and April 2014. This input does not necessarily reflect the views or position of the Government of Canada.
CONSULTING CANADIANS TO MODERNIZE AND IMPROVE FOOD LABELS

Canadian parents and consumers want to make informed choices about the food they buy and prepare for themselves and their families. Food labels are the main way for consumers to compare products when making their purchasing decisions.

The Government of Canada committed in the latest *Speech from the Throne* to consult Canadian parents on how to **improve the way nutritional information is presented on food labels**. The Minister of Health held a series of round table consultations with parents in January, February and March 2014. Canadians were also invited to share their views through an online consultation process open between January and April 2014.

Health Minister Rona Ambrose and Eve Adams, Parliamentary Secretary to the Minister of Health, met with several Canadian parents to talk about ways to improve nutrition information on food labels.
In Canada, food labelling is a shared responsibility for government at the federal level:

- **Health Canada** establishes the policies, regulations and standards related to the health, safety and nutritional quality of food sold in Canada. The Department also informs consumers about nutrition and health and safety issues related to food, through education and awareness campaigns, information updates and publications.

- The **Canadian Food Inspection Agency** (CFIA) enforces Health Canada’s policies and regulations. The Agency also administers and enforces non-health and safety policies and regulations related to food labels such as: basic requirements for common names, date markings, list of ingredients, and quantity; food grades; country of origin; organic standards; and claims such as “local” or “natural” or which highlight specific ingredients.

The Government of Canada has been working to modernize regulations through the Safe Food for Canadians Action Plan to support the *Safe Food for Canadians Act* passed in November 2012. As part of this initiative, the CFIA consulted consumers and other stakeholders between June 2013 and January 2014 to learn what they would modernize with respect to food labels to more appropriately respond to the needs of consumers and industry. A number of the issues found in the CFIA’s broad stakeholder engagement were shared by consumers who participated in the Health Canada engagement.

This document presents an overview of feedback from parents, consumers and other interested stakeholders who participated in one or more of the face to face consultations conducted by the CFIA and the Minister of Health, or responded to Health Canada’s and the CFIA’s online consultations, between June 2013 and April 2014. It is being used by the Government to inform the development of a modern and innovative food labelling system in Canada, as well as future discussions with Canadians related to improving food label regulations, policies and education initiatives.
WHAT WE HEARD

Many Canadian parents and consumers find that the information currently on food labels is useful when making their everyday food purchasing decisions for health, nutrition, and dietary reasons.

“The format of the nutritional information is clear and easy to read.”
“I like the ingredients list and how it starts with the ‘most’ and goes down to the ‘least’ amounts.”
“I like the order of the food label, starting with calories and ending with vitamins and minerals, because it flows logically. I also think the black and white contrast is effective and easy to read.”
“% Daily Value is easy to understand: 5% is a little, 15% is a lot.”
“The allergy alerts after the list of ingredients are usually clear and easy to understand, which is very convenient.”

However, there is room for improvement.

Canadians have many ideas about how food labels could be improved to help them find, read, understand and better use label information.
Reading Food Labels

Many consumers report reading one or more parts of the label when choosing which food products to purchase. To make this task easier, it was suggested that food label information:

Be easier to find, legible and in plain language using:

- A consistent format and placement to list ingredients and allergen information.
- Print size that is larger and/or easier to read in the ingredient list.
- Only simple, commonly used words.

Feature a clear, specific list of ingredients and standardized ingredient terms which:

- Identify spices, colours or flavours without using codes, numbers or vague terms such as “natural” or “artificial.”
- Group similar ingredients together, such as all sources of sugars (e.g., fructose, sugar, molasses, glucose solids, etc.) and update rules about ingredients.
- Specifically name added ingredients, such as added vegetable oils or sugars.
- Reflect modernized “recipes” for standardized foods, such as bread, dairy products and processed fruits and vegetables.

"The list of ingredients should be printed on visible parts of packaging, not on folded or crimped edges of the package."

“I want full disclosure of what is actually in the food product, in plain language, and not hidden.”

“Individual ingredients should be lumped together when they are essentially the same thing. Take sugar for example, a product might have six different sources, but they are spread out and hard to see."
Understanding Food Labels

While many consumers find food labels to be clear and useful for their information needs, others find parts of the label complicated or confusing. For example, some report that:

- It is difficult to use serving size information because it is inconsistent among similar products or does not seem to reflect what a person may eat as an average serving.
- It is unclear how the Daily Value percentages apply to a child or an adult with different daily caloric intakes.

“I wish the serving sizes were standardized among similar products.”
“I 100g of dry pasta is not useful. We never eat dry pasta and seldom cook one portion at a time.”
“What is the % Daily Value based on? How does it apply to children?”

Others report misunderstanding some information on labels, such as:

- The meaning of “natural,” “local” and “home-made,” and other similar terms.
- Highlighted ingredient claims and images.
- The formats of “best before” dates.

“The ‘natural’ claim is over-used and misunderstood. It misleads consumers into thinking the food is a healthy choice.”
“The ‘local’ claim policy does not reflect consumers’ understanding of the claim as the boundaries are too broad.”
“Too often a label will imply that the food contains a significant amount of desirable ingredients, yet the ingredients may be present in small amounts or non-existent. This is very deceiving to consumers.”
Suggestions to improve these parts of food labels include:

Standardizing the serving size on comparable products with:

- “Real” serving sizes (i.e., 10 crackers as opposed to two) to better reflect what a person may actually eat.
- Serving sizes that correspond to an easy fraction of the contents of the entire package.
- A standard basis for nutrition information, such as 100 grams, which is used in other countries.
- Adding the total servings per package.

Refining the use and format of claims by:

- Requiring clearer information about the highlighted ingredients on claim statements.
- Providing clearer requirements and guidelines:
  - to enable more claims, such as the benefits of eating fruits and vegetables; and
  - to prevent misleading claims, such as “fat free” and “gluten free”, on products that would never contain these ingredients.
- Providing clearer guidelines to differentiate between expiry, “packaged on,” and manufacturing coding.
- Ensuring consistent placement and format of “best before” dates.
- Standardizing quality and ingredient claims, such as for whole grains or other “whole” foods.

“Make the serving size representative of an amount that is typically eaten or at least an even division of the package contents.”

“If there is a way to standardize the serving size for similar products, it would improve the usability of the information.”

“I only think healthy foods should be allowed to use positive nutrition messages on their labels.”

“Revise or create criteria for claims such as ‘healthy’ or ‘nutritious.’ Food should have to meet several criteria before being allowed to make such claims.”
Suggestions also include:

Making nutrition information more visual:

- Using a “green, yellow, red” system to indicate whether the quantity of nutrients is high, medium or low.
- Introducing a standardized system to rate the overall nutritional quality of a food product.
- Adding descriptive words, such as “low, moderate, and high” to help consumers understand and choose healthier products.

“You could colour-code labels or give letter grades for meeting or exceeding dietary requirements.”

“Create a universal grading system for consumers to know if a food is a ‘choose most often’ or ‘choose sometimes’ food.”
Using Food Labels

Consumers report using the list of ingredients and the Nutrition Facts table on food labels most often because they want to be aware of:

- Any components to which they or their family may want or need to avoid, such as gluten or allergens.
- Calories, the amount of fat (including types), sugar and sodium for various health and dietary reasons.
- Fiber, protein, carbohydrate and vitamin content to meet daily recommended amounts.
- Any additives and preservatives (natural and synthetic) that may be included.
- The amount of certain ingredients or nutrients that may be present.

"I find calories, fat, saturated fat, sugar and serving size the most helpful as it gives me a rough idea of the daily limits.”

“I want to minimize my family’s exposure to food additives and processed food.”
Suggestions to improve these parts of food labels include:

Updating the Nutrition Facts table to:
- List the breakdown of healthy fats (polyunsaturated and monounsaturated) and Omega 3 and 6.
- Add daily maximum value for sugar, as well as the breakdown of “naturally occurring” and “added” sugars.
- Update % Daily Values using the latest science, such as for sodium.

Providing additional information on labels:
- To feature more nutrients on the Nutrition Facts table, such as potassium, folic acid, Vitamin B12 and Vitamin D, as well as substances such as caffeine.
- To help Canadians manage specific dietary needs or restrictions, such as information on potassium and phosphorus for those with renal disease or on gluten for those with Celiac disease.

Clearly identifying ingredients to which some Canadians may need (or want) to avoid by:
- Regulating the use of “may contain” statements to alert consumers of real cross-contamination risks.
- Restricting the use of alternative terms for ingredients, such as for monosodium glutamate or sugar.

"More and more of society is experiencing food allergies and intolerances. The better labelled our food is, the better decisions we can all make."

"I’m looking for some guideline concerning the “normal” daily limit of sugar – just as there is for salt."
Consumers also report using other parts of the label to meet health, dietary, environmental, cultural needs or social needs, such as where a product is from or how it is made. To help meet these information needs, consumers suggest:

- Including more information on labels about how the food was made, including animal welfare claims, such as “cage-free,” “free-range” and “grass-fed.”
- More complete country-of-origin information.
- Labelling genetically engineered or genetically modified ingredients in food products.
- Declaring the presence or use of pesticides, agricultural chemicals, antibiotics or growth hormones.

“Manufacturers should be required to disclose everything we feel is important to our health.”

“I want to know where each ingredient is cultivated and where the production occurs.”

“I want to know where my food comes from. If it’s meat, what the animals were fed and if they were given free range to roam.”
REGULATING AND ENFORCING FOOD LABELS

Suggestions about Canada’s food labelling regulations, policy and program development process and service delivery include:

• Balancing the participation of consumers, industry and other stakeholders to ensure consumer protection and more transparent processes.
• Having clearly established and effective rules and guidance to prevent misleading labelling claims and to facilitate compliance.
• More stringent regulations or a ban on advertising and marketing of food products to children.
• Enforcing food labelling rules and applying policies consistently and transparently, including through more training for inspectors.
• Providing guidance, information and support so that industry may more easily comply with food labelling regulations.

“When developing policy, make sure guidance is based on practical criteria that can be easily used.”

“Policies need to be widely accessible if industry is to consistently comply with them and consumers are to understand them.”

Canadians would also like more information on the Government’s food label complaints and enquiries process so it is easier to use and more transparent. In addition, they suggest that an effort be made to raise awareness of the process.

“Industry and consumers need access to opportunities to bring forward concerns or desires as they relate to food labelling.”
MAKING INFORMED CHOICES ABOUT FOOD

When asked about other activities or tools that could help consumers make healthier food choices for themselves and their families, Canadians made suggestions which involve many food safety and nutrition partners, including other government departments, industry and healthcare professionals. For example, they suggest:

- More affordable prices for healthy foods, such as fruits and vegetables, unprocessed foods and organic foods.
- Nutrition information in restaurants, school cafeterias, bakeries, daycares and recreation centers.
- Websites, Quick Response codes or apps so consumers have access to more detailed information on ingredients, Nutrition Facts tables and front-of-pack claims.
- User-friendly online resources and tools, such as printable Nutrition Facts table templates.

“Require manufacturers to include additional information on their products on websites and mobile applications would be beneficial to consumers.”

“We need healthier food environments in all publicly funded institutions: schools, hospitals, and community and recreation centers.”

“Stricter advertising rules on products for kids would help remove the misleading advertising being used by many food companies.”
THE IMPORTANCE OF EDUCATION

Food labelling and food label education campaigns are complementary, mutually supportive activities designed to help consumers benefit from the information featured on food products.

Canadians see the need for additional food education and awareness activities and tools so they may better read and understand the nutrition information on food labels and make healthier food choices for themselves and their families.

“(...) I believe that there needs to be much more education and information available to families apart from packaging labels.”

“The more informed I am, the better I am at making good food choices from my family.”
WORKING TOGETHER FOR CANADIANS

Through the Healthy and Safe Food for Canadians Framework, the Government of Canada is working to:

» Promote informed and healthy eating;
» Prevent food safety risks; and
» Protect Canadians from unsafe food.

Modernizing and improving food labelling in Canada is an important component of this initiative. The information found on food labels is used by consumers to make informed decisions about the food they purchase and consume.

The Government of Canada will continue to engage Canadians – parents, consumers and all other interested stakeholders, including public health organizations, health professionals and industry – in discussions about food labels to help improve the food labelling system. Their suggestions and ideas will contribute to proposals to modernize and improve the food labelling system in Canada.

For additional information on healthy and safe food, food labelling and consultation opportunities:

- Visit the website Canada.ca/health and the CFIA website at www.inspection.gc.ca/labelling
- Like us on Facebook at www.facebook.com/HealthyCdns
- Follow us on Twitter at www.twitter.com/CFIA_Food and www.twitter.com/healthcanada