

BRIEFING NOTE

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

BACKGROUND

As part of Health Canada's Healthy Eating Strategy¹, which aims to make healthy eating easier for Canadians, Health Canada is proposing to require a front-of-package (FOP) nutrition symbol on foods high in saturated fat, sugars and/or sodium.² According to Health Canada's 2015 Evidence Review for Dietary Guidance Technical Report³, many Canadians "need to make different food choices to improve the quality of their diet." Among other findings, about one-third of calories in the diet of Canadians were found to come from foods higher in fat, sugar, or salt.³

INTRODUCTION

In February 2018, proposed 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.² Since over two years have passed, since the Gazette posting, the regulation may need to be republished.

The proposed FOP regulations modify the end date of the original transition period for the new nutrition labelling regulations from December 2021 to December 2022. This change would consolidate the compliance dates for nutrition label changes and FOP labelling.

NUTRIENTS OF CONCERN

Health Canada states saturated fats, sodium and sugars are nutrients of concern based on association with chronic diseases such as diabetes for example.³ 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.⁴

Data from the Canadian Community Health Survey (2015), saturated fats contributed 10.4% of total energy intake among Canadian adults.⁵ Based on Canadian consumption patterns, it would appear that saturated fat does not fall into the category of 'nutrients of concern'.

Furthermore, the science around saturated fat and health outcomes has evolved.^{6,7,8,9} Heart and Stroke Canada has taken a position on saturated fat stating "...recommendations do not include a threshold or limit for saturated fats 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.¹⁰

The Codex Committee on Food Labelling has identified issues in setting "high in" criteria.¹¹ One issue is whether to use a nutrient focus and single-cut off versus considering the overall nutrient profile of the food. A single-nutrient approach in defining "high in" levels may be applicable to discretionary foods (energy dense non-nutritive foods) but not to all foods, especially the core foundational foods. Potato chips versus ground beef, for example. Codex is considering whether to exempt nutrient-rich foods and foods that nourish vulnerable groups from "high in" nutrition labelling.

THRESHOLDS FOR FOP LABELS

FOP labelling will be triggered if the saturated fat, sodium and/or sugars as declared on the Nutrition Facts table of a prepackaged food represents 15% of the daily value (DV) per reference amount as sold. For example, for ground beef, the amount of saturated fat listed will be based on 100 grams raw ground beef. If the amount of saturated fat (which includes total amount of saturated and trans fat combined) in the reference amount exceeds 3 grams then a FOP label would be required, according to the Health Canada proposal.

Reference Amounts for FOP Labels Thresholds**

Meat Category	Reference Amount ¹²	15% DV threshold
Ground beef, raw	100 g	3 g sum of saturated fat and trans fat 350 mg sodium 15 g sugars
Deli meats – fully cooked	55 g	
Uncooked sausage	75 g	
Fully cooked sausage	55 g	

**reference amounts in Schedule M of the Food and Drug Regulations¹²

EXEMPTIONS FROM FOP LABELLING

The proposed changes to the Food and Drug Regulations do not require single-ingredient foods, like meat cuts, poultry, fish, vegetables and fruit, to carry a Nutrition Facts table. Therefore, since these foods do not carry a Nutrition Facts table, they are exempt from FOP labelling. However, as is currently in the regulations, all ground meats – beef, chicken, turkey, veal, and pork – require a Nutrition Facts table.

PROPOSED FOP SYMBOLS

The FOP proposal included options for the FOP symbol. The mandated visual will be included in the final Regulation that will be published in the Canada Gazette, Part II, and inserted directly in the Food and Drug Regulations. Of note, a variation of this symbol was included in Health Canada's focus group testing of food guide visuals.



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/or sugars like some cookies, chips and diet soda (see table below).

On the other hand, many wholesome, nutritious foods, like ground beef, would be above the threshold for saturated fat and would have to display one. It is a negative approach to dealing with foods that are nutrient dense. Ground beef provides many essential nutrients, including iron, a key nutrient of concern for the Canadian population.

Example of Some Foods that Would/Would Not Carry a FOP Label*

Food	Above threshold for sodium	Above threshold for saturated fat	Above threshold for sugar	FOP label
Bear paws soft cookies				NO
Caramel chocolate chip rice cakes				NO
Potato chips, original				NO
Diet soda				NO
Deli roast beef - "Natural Selections"	✓			YES
Shaved smoked chicken breast - "Natural Ingredients"	✓			YES
Walnuts		✓		YES

* Based on the Nutrition Facts table and the Canadian Nutrient File.

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