



## **Ontario Home Economics Association**

*Ask a Professional Home Economist*

**For Immediate Release**

### **Home Economists Respond to Health Canada**

#### **Re: Proposed Nutrition and Food Labelling Regulations**

by Clarey Hodge, P.H.Ec.

Health Canada (HC) called for public response to its proposed revisions to nutrition and food labelling regulations in July 2014. The consultation consisted of five separate documents to address each of the cornerstones of nutrition and food labelling in Canada.

The Ontario Home Economics Association (OHEA) convened a committee of eight Professional Home Economists with diverse areas of practice to help HC achieve its objective of improved food labelling in Canada. Evaluation included individual review, citation of published studies and sources of pertinent information, analysis of the pooled responses, identification of patterns of agreement or disagreement, group discussion, capacity for dissenting opinion, and, engagement with HC.

*The following recommendations were made on behalf of OHEA:*

#### **Core Nutrients in the Nutrition Facts Table**

HC proposed replacement of Vitamins A and C with Vitamin D and potassium, and, retention of iron and calcium, and separately proposed a declaration of “added sugars”, under the declaration of “total sugars”.

*OHEA supported the addition of Vitamin D and potassium and the retention of iron and calcium as required micronutrients. However, concern was expressed regarding the proposed elimination of the mandatory declaration of Vitamin C, citing cases of scurvy in some low-income neighbourhoods, and a need to remind consumers of the importance of this essential nutrient.*

*HC’s rationale to remove the mandatory declaration of Vitamin A was not accepted by all OHEA committee members. OHEA recommended the mandatory declaration of the predominant top four of the following six micronutrients – Vitamins A and C, minerals calcium and iron, plus the proposed Vitamin D and potassium.*

*OHEA agreed that an “added sugars” declaration could result in more nutritious food selection. Strong concern was expressed regarding the need for accuracy and the complexity of enforcement. The OHEA Committee acknowledged the need for considerable consumer education to ensure better understanding of “total sugars”, “added sugars” and “naturally-occurring sugars”.*

## **Daily Values**

HC proposed a revised Daily Value (DV) for most of the essential vitamins and minerals; a revision to the DV for total fat; a first-time DV for each of trans fats and total sugars; removal of a mandatory DV for dietary fibre and removal of a DV for total carbohydrate.

*Unanimously, OHEA agreed with all proposals, except a voluntary DV for dietary fibre and removal of the DV for total carbohydrate. OHEA found the HC argument regarding the mathematical determination of the DV for dietary fibre to be lacking in consideration of the many health benefits of the nutrient. OHEA defied expert opinion that dietary fibre is not an essential nutrient and deemed that removal of a mandatory DV for dietary fibre would infer that it is not a necessary component of healthy eating.*

*While OHEA accepted a DV for total sugars, it is not prepared to do so without a mandatory DV for total carbohydrate, citing the many types of carbohydrates beneficial to human health, and, the folly of a Nutrition Facts Table (NfT) focused solely on sugars. Lastly, OHEA informed HC that % DV's is a confusing concept for consumers, and challenged HC to consider a term which reflects desired behaviour such as "Maximize Intake (MI)" or "Daily Need" in place of DV.*

## **Display of Nutrition Information**

HC proposed re-grouping of the Nutrition Facts Table (NfT) information such that nutrients for which consumption should be curtailed lead under the caption "limit intake of" followed with the shortfall nutrients captioned as "consume enough of", along with the necessary formatting and graphics to facilitate the messages. Consequently, HC proposed to move dietary fibre from the carbohydrate section and declare it with protein and the micronutrients. HC also proposed fundamental changes to the List of Ingredients, which includes minimal-sized black font on a white background, bulleted separation of ingredients, and moreover, parenthetical grouping of all sugars.

*OHEA regarded the notion of re-grouping nutrients in the NfT, as an improvement over the current grouping by nutrient similarity. Still, OHEA expressed caution with this approach, and advised that dietary fibre be declared in the carbohydrate section. Unanimous support for the re-formatting of the List of Ingredients was expressed. OHEA took the concept of grouping sugar sources into one declaration to a stronger recommendation that would see sodium sources, and separately, fat sources grouped together. The Rationale is that all three are nutrients of public health concern. Readers of a food label cover a diverse set of dietary needs, and moreover, consumers would be better informed when an ingredient is identified as source of sugar, fat or sodium.*

## **Reference Amounts**

Reference Amounts are pre-determined portions of foods which are currently used to verify certain health claims. HC proposed not only a longer list of Reference Amounts, but also that these be determined by consumption data and used to standardize serving sizes of food in NfTs.

*The OHEA Committee expressed the propensity for large Reference Amounts to serve as a tacit endorsement of larger serving sizes, resulting in over-consumption-related health issues. In response, OHEA identified Canada's Food Guide (CFG) serving sizes as a scientifically-validated reference point and valuable nutrition education tool in Canada. Lastly, OHEA*

*encouraged HC to develop ways of determining Reference Amounts, other than the often-unreliable consumption data.*

### **Serving Sizes**

HC intends to standardize serving sizes in the NFt through the application of Reference Amounts (consumption data), and to that end, proposed three separate guidelines to assist the food industry in doing so.

*While OHEA wholeheartedly agrees with the need for standardized serving sizes, Professional Home Economists could not accept that the public will be better served through this approach. Instead, OHEA recommended incorporation of CFG's serving sizes as a consistent point of reference, and in the absence of a CFG counterpart – the Reference Amount.*

*Dual format NFts were also recommended, consisting of a CFG serving size and the manufacturer's serving size, allowing consumers to more easily compare similar foods. Lastly, if the incorporation of a CFG serving size into the NFt is not acceptable to HC, OHEA recommended a footnote disclaimer to the effect of "this portion size does not reflect a Canada's Food Guide serving size" and inclusion of the CFG website.*

A common thread throughout OHEA's response to each of Health Canada's consultation documents was citation of the current role played by OHEA at large, and by individual members, in educating the public about improved dietary selection through improved food literacy, including how to read a food label.

The final revised legislation governing food labelling in Canada will have a profound impact on new packaging for industry, new food labels for consumers and new education programs for communities – all with the intent to enable consumers to make more informed and healthful dietary choices.

OHEA looks forward to future collaboration with HC in the design and implementation of food labelling and nutrition education programs to optimize mutual objectives of both organizations.

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**Ontario Home Economics Association (OHEA)**, a self-regulated body of Professional Home Economists, promotes high professional standards among its members so that they may assist families and individuals to achieve and maintain a desirable quality of life.

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