Dear Minister Philpott,

Collectively, as a group of health organizations, health professional associations and several academics, we are writing to express our appreciation for your Department's work on the consultation document, Toward Front-of-Package (FOP) Nutrition Labels for Canadians, as part of the Healthy Eating Strategy. In this letter, we focus on outcomes of a joint technical meeting on February 23, 2017 with Dr. William Yan, Dr. Alfred Aziz and Ms. Charmaine Kuran of the Food Directorate, as we had requested, to discuss the rationale for the FOP approach and nutrient content claims proposed and concerns about potential consumer understanding, as well as to provide collective input related to these points.

Participants at the meeting unanimously conveyed their support for a mandatory FOP labelling system that would address food products high in sodium, sugar and/or saturated fat. We believe it is consistent with global health recommendations to decrease the prevalence of diet-related chronic diseases. Mandatory addition of interpretive information, when these nutrients of public health concern are present in high amounts, will support more consistent, comprehensive and balanced messaging about nutrient content, and facilitate healthier choices. We believe the use of a simple, highly visible, interpretive FOP symbol approach would be much more effective at drawing consumer attention and providing context than a voluntary approach, such as replicating information from the Nutrition Facts table (NFT) on the FOP, which we understand has been proposed by some manufacturers.

Below, we highlight some important concerns, which we believe still need to be addressed:

1. Testing is imperative to determine consumer understanding of the meaning of the symbols and overall messaging and the potential to positively influence food choices. Notably, testing ought to determine whether misunderstanding is created by multiple FOP symbols co-existing with voluntary nutrient content claims and if solutions to overcome any unintended confusion are effective;
2. Within the FOP label (a bordered area in a consistent location), a reference statement with a website link should be included to identify the FOP label as a Health Canada requirement and to direct consumers to useful interpretive resources;
3. The proposed voluntary claims for ‘low in sugars’ and ‘lightly sweetened’ are not supported due to potential to add complexity and to be confusing or misleading (e.g., ‘lightly sweetened’, as defined, could be used on products with sugar levels in excess of internationally accepted thresholds);
4. Many food items remain exempt from requiring a NFT at point of final purchase and, by extension, a FOP label (e.g., grocery store deli and bakery products, menu items in chain restaurants). However, these items are produced with similar ingredient formulation, in central processing facilities, as with pre-packaged products. We continue to advocate for amendment of these exemptions, to require that the same information be provided for all standardized food products at point of consumer purchase, whether in store or purchasing online. Such a requirement would also be useful as more regions implement menu labelling in food service settings.
In anticipation of important changes introduced through the Healthy Eating Strategy, we offer to continue the dialogue with Health Canada staff, to achieve effective and reasonable policy and regulations towards a healthy and sustainable food system in Canada.

Sincerely,

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