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Health Canada's Proposed Changes to the Format Requirements for the Display of Nutrition and Other Information on Food Labels

July 14, 2014

Bureau of Nutritional Sciences
Food Directorate
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Canada 

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List of Abbreviations

CFIA	Canadian Food Inspection Agency
DV	Daily Value
% DV	percent Daily Value
FDR	<i>Food and Drug Regulations</i>

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1. Executive Summary

In response to a commitment identified in the 2013 *Speech from the Throne* to consult with Canadian parents and consumers on ways to improve nutritional information on food labels, Health Canada is undertaking a broad review of the nutrition labelling regulations. This review has led to proposed revisions to the format requirements of the Nutrition Facts table and the list of ingredients and to a proposed enhancement of information on bioactive components added to foods.

Health Canada is proposing the following key changes:

1. Increasing the prominence of Calories in the Nutrition Facts table;
2. Grouping of nutrients in the Nutrition Facts table in such a way to allow consumers to more easily identify nutrients for which consumption should be limited and those to get enough of, based on their percent Daily Value (% DV);
3. Adding a footnote that explains the benchmark % DV levels at the bottom of the Nutrition Facts table;
4. Declaring the amounts by weight of vitamins and mineral nutrients;
5. Standardizing the format and improving the legibility of the list of ingredients; and
6. Adding an optional box below the Nutrition Facts table that would provide information on bioactive components added to foods, such as caffeine.

Food labelling oversight is a shared responsibility between Health Canada and the Canadian Food Inspection Agency (CFIA), and both organizations will work closely together to modernize food labelling.

2. Purpose

The purpose of this document is to outline the rationale for Health Canada's proposed changes to the format requirements for the display of nutrition and other information on food labels and to solicit feedback on the proposed changes from interested stakeholders and consumers.

3. Current Context

On January 28, 2014, the Minister of Health announced the launch of a consultation with Canadian parents and consumers on ways to improve nutritional information on food labels, in response to a commitment identified in the 2013 *Speech from the Throne*. The initial phase of the consultation consisted of an online questionnaire and face-to-face roundtable discussions in selected locations across Canada. This phase of the consultation closed on April 30, 2014. On June 10, 2014, a *What We Heard* report was published that provides an overview of the feedback received during this phase of the consultation.

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Health Canada is now entering into consultations with the broader stakeholder community on various technical aspects of nutrition labelling, including the proposed changes to the format requirements described in this document. Separate consultation documents have been prepared on other aspects of the Nutrition Facts table, specifically [serving size](#), [reference amounts](#), [the Daily Values \(DVs\)](#), and the [list of core nutrients](#). Input from these consultations and earlier feedback from Canadian parents and consumers will be used in conjunction with other data sources in the development of proposed amendments to the nutrition and food labelling regulations.

4. Background

4.1 Nutrition Labelling in Canada

On December 12, 2002, the Government of Canada promulgated regulatory amendments to the [Food and Drug Regulations \(FDR\)](#), requiring most prepackaged foods to carry a Nutrition Facts table in a consistent format [2]. The regulations on nutrition labelling aim at preventing injury to the health of Canadians, including those with special dietary needs, by providing product-specific nutrient information to assist in making informed food choices. Nutrition labelling requirements include the declaration of the energy value and nutrient content as well as format considerations of the Nutrition Facts table (see Figure 1).

4.2 History of Format Requirements for the Current Nutrition Facts Table

The current regulations require nutrition information to be presented in a standardized Nutrition Facts table. Consultations with literacy experts, consumer advocates and the design and packaging industry at that time concluded that consumers found it difficult to locate and understand nutrition information when various designs or formats were used to present that information. As a result, Health Canada developed a consistent standardized format for the Nutrition Facts table in order to ensure the accessibility, legibility and understanding of the nutrition information. The standard format for the Nutrition Facts table was identified as the format that was the easiest and fastest to read and use, and therefore should be used most often. Horizontal and linear formats may only be used in limited circumstances as they are more difficult to read and use.

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Figure 1. Example of the Current Nutrition Facts Table

- Core list of Calories and 13 nutrients always declared
- Actual amount of the nutrient in the stated serving of the food is listed for macronutrients and sodium

Nutrition Facts	
Valeur nutritive	
Per 3/4 cup (175 g) / par 3/4 tasse (175 g)	
Amount Teneur	% Daily Value % valeur quotidienne
Calories / Calories 170	
Fat / Lipides 5 g	1 %
Saturated / saturés 3.5 g + Trans / trans 0.2 g	10 %
Cholesterol / Cholestérol 20 mg	
Sodium / Sodium 80 mg	3 %
Carbohydrate / Glucides 23 g	8 %
Fibre / Fibres 0 g	0 %
Sugars / Sucres 18 g	
Protein / Protéines 7 g	
Vitamin A / Vitamine A	4 %
Vitamin C / Vitamine C	0 %
Calcium / Calcium	20 %
Iron / Fer	0 %

- The nutrient information is based on a specified amount of food as sold (serving size)
- % Daily Value (% DV) indicates the amount of the nutrient relative to the Daily Value

5. Proposed Changes to the Format Requirements of the Nutrition Facts Table

In the [What We Heard](#) report published on June 10, 2014, Canadians told the Government of Canada that they find the information currently on food labels useful when making their everyday food purchasing decisions for health, nutrition, and dietary reasons. They generally said that the Nutrition Facts table is easy to find because of its distinctive look, and trust the information contained within. Thus, Health Canada would largely retain features that contribute to the legibility of the Nutrition Facts table, such as background colour, font type, sizes and colour, delineation and space on the label.

However, Canadians also indicated that some improvements could be made to the Nutrition Facts table. These included making serving sizes more consistent among similar products, clarifying what the % DV means, and declaring the absolute amounts of vitamins and mineral nutrients.

Figure 2 illustrates and summarizes the format

What We Heard, 2014

“The format of the nutritional information is clear and easy to read”

“I like the order of the food label, starting with calories and ending with vitamin and minerals, because it flows logically. I also think the black and white contrast is effective and easy to read.”

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changes being proposed to improve the understanding and use of the Nutrition Facts table by Canadians. Some proposed changes to the content of the Nutrition Facts table are illustrated here (for example, changes to % DVs, replacement of Vitamins A and C with Vitamin D and potassium, and different approaches for the declaration of sugars), but are discussed in detail in [Health Canada's Technical Consultation on Proposed Changes to the Daily Values \(DVs\) for Use in Nutrition Labelling](#), and [Health Canada's Technical Consultation on Proposed Changes to the Core Nutrients Declared in the Canadian Nutrition Facts Table](#) .

Figure 2. Proposed Changes to the Nutrition Facts Table

Nutrition Facts Valeur nutritive	
Per 3/4 cup (175 g) / par 3/4 tasse (175 g)	
Calories 170	% Daily Value (DV)* % valeur quotidienne (VQ)
Fat / Lipides 5 g	1 %
Saturated / saturés 3.5 g	18 %
Trans / trans 0.2 g	10 %
Cholesterol / Cholestérol 20 mg	
Sodium / Sodium 450 mg	20 %
Carbohydate / Glucides 23 g	
Total Sugars / Sucres totaux 18 g	18 %
Added Sugars / Sucres ajoutés 12 g	
Fibre / Fibres 0 g	
Protein / Protéines 7 g	
Vitamin D / Vitamine D 1.3 µg	9 %
Calcium / Calcium 220 mg	17 %
Iron / Fer 2 mg	10 %
Potassium / Potassium 150 mg	4 %
*5% DV or less is a little; 15% DV or more is a lot 5% VQ ou moins c'est peu; 15% VQ ou plus c'est beaucoup	

The objectives of the proposed changes are to further assist consumers in understanding and appraising the information provided in the Nutrition Facts table and thus help support informed food choices to improve and maintain healthy eating practices. The proposed changes are visually appealing and retain the successful features used in the current Nutrition Facts table, but better highlight some components by providing more prominence to key information and by reordering and grouping the nutrients differently. Refer to [Appendix 1: Comparison Between the Current and the Proposed Nutrition Facts Table](#) at the end of this document for a comparative representation of both current and proposed Nutrition Facts tables.

For ease of reference, the proposed changes will be discussed in order of appearance in the Nutrition Facts table, from top to bottom.

5.1 Location of the Serving Size

Proposed change: The serving size information would be moved to the right hand side of the table; this would allow the eye to flow across the information.

Rationale: Research shows that information on the “amount of food” or “serving size” is overlooked by a significant proportion of consumers. Only about 1% of consumers consistently look at the serving size on food labels [6]. By making this small change, white space is created resulting in a less cluttered appearance, therefore putting emphasis on the serving size.

5.2 Increasing the Prominence of Calories

Proposed changes: The words “Amount” and “Teneur” would be removed from the fourth row of the table thus, leading to increased space availability to show a larger, bolded “Calories” declaration. A thick line under the “Calories” declaration would help further emphasize this information.

Rationale: Proximity is a graphic design principle that asserts that items closer together are perceived to be more related. The new positioning of the Calories brings it closer to the serving size information which may help consumers more easily recognize that the caloric information is for the stated serving size. The words “Amount/Teneur” did not provide additional information for consumers and could easily be removed from the table to create more space for the Calories without having to add a new line. Increasing the thickness of the line below the Calories directs the reader’s eye to the Calories and clearly separates it from the information below it, thus making it easier for consumers to process and remember the information [5]. Excessive caloric intake is a major contributor to overweight and obesity, which are significant public health problems in Canada [3]. An increased prominence of Calories could help Canadians who are monitoring their caloric intake more easily access the caloric information in the Nutrition Facts table [4].

5.3 Grouping of Nutrients

Proposed changes: Nutrients in the Nutrition Facts table would be grouped in such a way to allow consumers to more easily identify nutrients to limit consumption of and those to get enough. This identification would be based on the requirement to declare the %DV for nutrients of public health concern, where applicable. Specifically, fat, saturated fat, *trans* fat, sodium and sugars, which are nutrients of public health concern related to excessive intake, would be positioned between the “Calories” and a thick line that separates them from fibre and the vitamins and minerals of public health concerns that are often under consumed by Canadians. Cholesterol, carbohydrate and protein are not considered nutrients of public health concern, and along with fibre, would not require a mandatory % DV declaration, as discussed in [Health Canada's Technical Consultation on Proposed Changes to the Daily Values \(DVs\) for Use in Nutrition Labelling](#) consultation paper. However, these four nutrients would appear either above

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(cholesterol and carbohydrate) or below (fibre and protein) the thick line for different reasons discussed below.

Cholesterol: Dietary cholesterol is a nutrient that is of concern for some subgroups of the population affected by medical conditions such as heart disease. Because cholesterol is a lipid, we are proposing to retain its position below the fats.

Carbohydrate, sugars and fibre: Carbohydrates are a class of nutrients that encompass starches, sugars, sugar alcohols and fibre. The amount of carbohydrate declared in the Nutrition Facts table is the total of all sources of carbohydrates. This amount is critical for people with diabetes on insulin therapy and who rely on the carbohydrate-related information in the Nutrition Facts table to adjust their insulin dose requirements to their carbohydrate intake. Health Canada is proposing to make some adjustments to the display of these nutrients in the Nutrition Facts table by declaring sugars indented below carbohydrates, followed by fibre (non-indented) below the thick line. This is because fibre is a nutrient that Canadians are encouraged to get enough and a variety of; whereas sugars are nutrients of public health concern related to excessive intakes that Canadians are encouraged to limit. It is anticipated that keeping the fibre content just under the declaration of carbohydrate and sugars would continue to enable people with diabetes on insulin therapy to easily calculate their insulin needs.

Note that there are two approaches proposed for the declaration of sugars in the Nutrition Facts table: one approach is to require the declaration of % DV for sugars and the other is to require the declaration of the amount of added sugars. The latter approach would place “Total Sugars” indented below carbohydrates and “Added Sugars” further indented below “Total Sugars”. Both approaches are illustrated in Figure 1 and discussed in detail in [*Health Canada's Technical Consultation on Proposed Changes to the Core Nutrients Declared in the Canadian Nutrition Facts Table*](#) consultation paper.

Protein: Protein is not a nutrient of public health concern in Canada. However, protein claims, such as source, good source, and excellent source of protein are allowed in Canada, making the proposed positioning of protein under the thick line appropriate.

Health Canada is also proposing to delete the thin lines between fat and saturated / *trans*, as well as between carbohydrates and sugars.

Rationale: The separation of these two groups of nutrients by a thick line creates a “grouping” that makes it easier for consumers to process and remember the information [5]. The deletion of the thin lines under fat and carbohydrates de-clutters the table, increases white spaces, therefore increasing the legibility of the information. This also helps consumers identify that the indented nutrients are components of fat or carbohydrates. By separating the nutrients that Canadians are encouraged to limit from those the nutrients they are encouraged to get enough by a thick line, Canadians would be able to make this differentiation at a glance. This, in conjunction with the declaration of the %DV for these nutrients, may help when choosing and comparing products, which is a key use of the Nutrition Facts table by Canadians [1].

5.4 Declaration of the Amounts by Weight of Vitamins and Mineral Nutrients

Proposed change: Under the current regulations, only the % DV declaration is required for the mandatory and voluntary vitamins and minerals, with the exception of sodium and potassium that also require the declaration of amounts by weight. Health Canada is proposing to extend this requirement to all mandatory and voluntary vitamins and minerals.

Rationale: When using the Nutrition Facts table to compare foods, consumers have indicated that they use both the actual amount of a nutrient and the % DV [7]. Health professionals and their clients are also interested in knowing the amounts by weight of vitamins and minerals as it may facilitate the management of the clients' overall diet, including the use of vitamins and/or mineral supplements.

What We Heard, 2014

"For food ingredients there is a different measurement such as grams or milliliters for comparison. Why not adopt the same labelling system for vitamins in the food we eat as is required for vitamin supplements that we buy."

5.5 Addition of a Footnote to Explain the % DV Benchmark Levels

Proposed changes: Health Canada is proposing the addition of a footnote at the bottom of the Nutrition Facts table that would explain the meaning of the % DV benchmark levels and that would read: "5% DV or less is a little; 15% DV or more is a lot". An asterisk (*) beside the % Daily Value title at the top of the table would refer consumers to the footnote.

Rationale: Although many consumers have learned how to use the % DVs, many Canadian consumers still struggle with the concept behind the % DV information [1, 7, 8]. The % DV has been at the core of the Nutrition Facts Education Campaign since 2010. The educational message on how to use the % DV is intended to increase consumers' awareness and understanding of this concept. Having the % DV educational message on every product that carries a Nutrition Facts table would increase the reach and therefore would likely increase the awareness, understanding, and use of the concept by Canadians [9].

6. Proposed Changes to the Format of the List of Ingredients

Most prepackaged foods with more than one ingredient must declare their ingredients and components in a list of ingredients. Ingredients must be declared in decreasing order of proportion by weight. In Canada, the FDR set out a general requirement that all information required to appear on a label of a food shall be: clearly and prominently displayed on the label; and readily discernible to the purchaser or consumer under the customary conditions of purchase and use [10]. Current regulations do not provide specific type height requirements but the

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minimum type height of 1.6 mm (1/16 inch), based on the lowercase letter "o", is considered to be sufficient to meet the requirement [11].

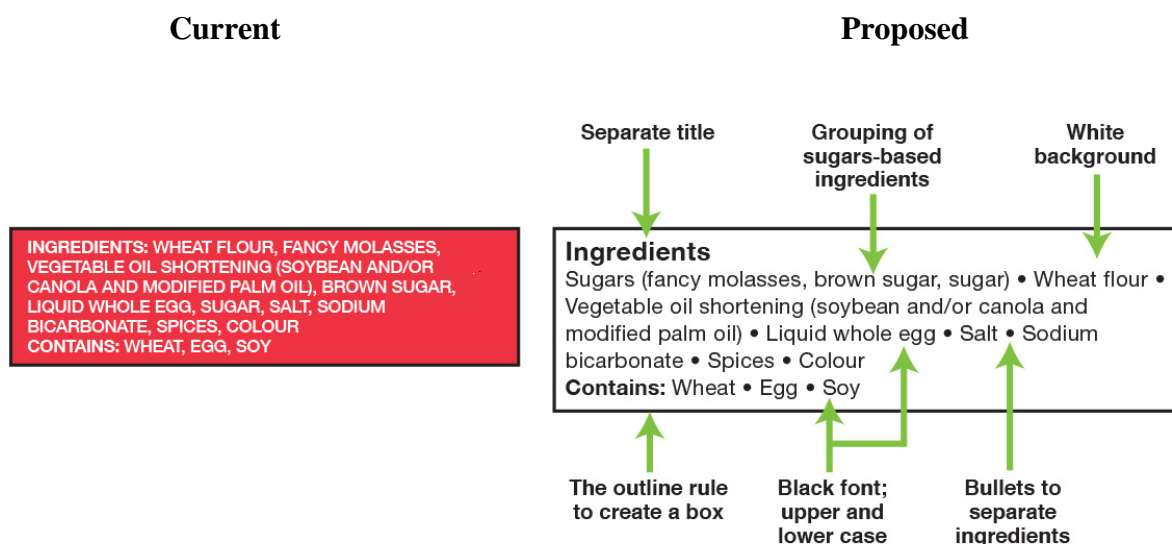
Consumers typically use the list of ingredients to determine what ingredients primarily make up the food products and, in the case of those individuals with specific health concerns, to avoid purchasing foods containing certain ingredients, such as allergens. While

Canadians understand how to use the list of ingredients, they have expressed interest in having a consistent format and placement [1]. In addition, Canadians find reading the list of ingredients sometimes difficult due to small letters or poor colour contrast. These concerns are consistent with a study that showed that only 7% of the sampled lists of ingredients were found to be easy to read [12]. The image on the left of Figure 3 illustrates an example of some of the issues related to current practices in displaying the list of ingredients: white text on coloured background and use of all upper case letters.

Health Canada Online Consultation 2014

"The ingredients list can be improved by: placing it in a standard spot on all packages such as the top back or left side, using horizontal print in sentence case, with good color contrast on a light background, in a font size that is easily legible without a magnifying glass."

Figure 3: Proposed Changes to the List of Ingredients



Proposed changes: Health Canada is proposing to require a consistent format for the list of ingredients with a look and feel similar to that of the Nutrition Facts table. The proposed changes include: a thin rule outlining the space around the information to form a box; specifications for a maximum box width; a bolded title “Ingredients” on its own line; requiring black print on a white or neutral background; font type and size consistent with the direction set out in the FDR for the Nutrition Facts table including the use of a capital for the first letter of

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each main ingredient; and bullets to separate each main ingredient. In addition, when a “Contains” statement is provided to further alert consumers of the presence of priority allergens, gluten source or added sulphites, this information would be required to be within the ingredient box as depicted in Figure 3. This would also be the requirement for precautionary allergen labelling “May Contain” statements.

Rationale: Consumers like the Nutrition Facts table for its easy to recognize format. The proposed changes would provide a consistent look for the list of ingredients on all products and help make the information easier to find. It would also improve the legibility by providing a good contrast of colour (black on white) and improve the ease of reading each ingredient. The use of mixed case (upper and lowercase letters) gives clues for differentiating between separate ingredients. As well, the ascending and descending parts of mixed case letters contribute to legibility by assisting readers to more easily identify words according to their characteristic shapes and to recognize words efficiently. Bullets between the individual ingredients could improve the identification of the beginning and end of the ingredient name. Canadians would also be able to locate the list of ingredients and related allergen statements more easily on food labels.

In addition, Health Canada is proposing to group all sugar-based ingredients in parentheses following the common name “sugars”, which would be placed in the list of ingredients based on their total relative contribution to the food. This proposal, along with other proposed approaches to enhance the information related to sugars, is discussed in [*Health Canada's Technical Consultation on Proposed Changes to the Core Nutrients Declared in the Canadian Nutrition Facts Table*](#) consultation paper.

7. Proposed Voluntary Food Information Box on the Food Label

Many consumers have expressed an interest in being able to find certain information on bioactive compounds added to foods. Currently, Health Canada encourages manufacturers to voluntarily declare the total amount of caffeine present, on a per serving basis, on the label of carbonated beverages to which caffeine as a food additive has been added. On the other hand, it is currently a requirement that caffeinated energy drinks carry a declaration of the total caffeine content. Although the quantitative declaration of caffeine can help consumers manage their intake of caffeine, Health Canada is not currently proposing to change any of these labelling policies or requirements, but remains committed to further investigating the development of a voluntary information box and to explore the types of information that would benefit consumers to be captured within such a box.

Proposed enhancement: Health Canada is proposing to develop a voluntary information box that would appear immediately below the Nutrition Facts table (see Figure 4). The purpose of the box would be to provide a readily accessible place to highlight information on certain bioactive components. This could include a quantitative declaration of total caffeine content per stated serving size. If used, the box would be required to follow the same format and legibility

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requirements as proposed for the list of ingredients and would need to appear directly after the Nutrition Facts table.

Figure 4: Proposed Example of a Voluntary Food Information Box for a Caffeinated Product

Additional Information
Caffeine: 35 mg/355 mL

Rationale: Consumers like the Nutrition Facts table for its easy to recognize format. A similar type of approach to present other important information could enhance consumers' quick access to relevant information and use of the label as a trusted piece of information.

8. Other Considerations

Food labelling oversight in Canada is a shared responsibility between Health Canada and the CFIA. Health Canada is responsible for setting the health and safety and nutrition related provisions of the FDR, while the CFIA is responsible for setting the non-health and safety provisions of the FDR, along with enforcing all of these provisions and other requirements set out under separate legislation [12]. As consumers access the list of ingredients and related information for both health and safety and other reasons, Health Canada considers that improving this aspect of the food label is a shared responsibility and will work closely with CFIA in the implementation of any changes.

9. Submitting Comments to Health Canada

Comments on the proposed changes to the format requirements for the display of nutrition and other information on food labels as outlined in this technical consultation document may be submitted in writing by regular mail or electronically at the address indicated below. If you are submitting your comments electronically, please use the title “**Proposed Format Changes**” in the subject box of your email. Submissions must be received by 11:59 p.m. EST on September 12, 2014.

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Appendix 1: Comparison Between the Current and the Proposed Nutrition Facts Table

Current Nutrition Facts table

Nutrition Facts Valeur nutritive	
Per 3/4 cup (175 g) / par 3/4 tasse (175 g)	
Amount Teneur	% Daily Value % valeur quotidienne
Calories / Calories 170	
Fat / Lipides 5 g	1 %
Saturated / saturés 3.5 g + Trans / trans 0.2 g	10 %
Cholesterol / Cholestérol 20 mg	
Sodium / Sodium 80 mg	3 %
Carbohydrate / Glucides 23 g	8 %
Fibre / Fibres 0 g	0 %
Sugars / Sucres 18 g	
Protein / Protéines 7 g	
Vitamin A / Vitamine A	4 %
Vitamin C / Vitamine C	0 %
Calcium / Calcium	20 %
Iron / Fer	0 %

Proposed Nutrition Facts table

Nutrition Facts Valeur nutritive	
Per 3/4 cup (175 g) / par 3/4 tasse (175 g)	
Amount Teneur	% Daily Value (DV)* % valeur quotidienne (VQ)
Calories 170	
Fat / Lipides 5 g	1 %
Saturated / saturés 3.5 g Trans / trans 0.2 g	18 % 10 %
Cholesterol / Cholestérol 20 mg	
Sodium / Sodium 450 mg	20 %
Carbohydrate / Glucides 23 g	
Total Sugars / Sucres totaux 18 g Added Sugars / Sucres ajoutés 12 g	18 % 18 %
Fibre / Fibres 0 g	
Protein / Protéines 7 g	
Vitamin D / Vitamine D 1.3 µg	9 %
Calcium / Calcium 220 mg	17 %
Iron / Fer 2 mg	10 %
Potassium / Potassium 150 mg	4 %

*5% DV or less is a little; 15% DV or more is a lot
5% VQ ou moins c'est peu; 15% VQ ou plus c'est beaucoup

- Move calories up, bold and increase font size →
- Remove thin line between Fat and Saturated →
- Nutrients of public health concern to limit have a %DV and are above the thick line →
- Nutrients of public health concern to get enough of have a %DV and are below the thick line →
- Add footnote explaining how to use % DV →

- ← Right justify Serving Size
- ← Add asterisk referring to footnote
- ← Add thick lines (3x)
- ← Separate DV's for trans and saturated fat
- ← Updated Daily Values
- ← Have a %DV for total sugars
- ← Add a declaration for "added sugars"
- ← Add absolute amounts for vitamins/minerals; Remove Vitamin A and C, add Vitamin D and Potassium

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