

December 19, 2018

### An update on nutrition and list of ingredient changes affecting food labels

In December 2016, Health Canada finalized amendments to the Food and Drug Regulations (FDR) that include changes to the List of Ingredients (LOI) and the Nutrition Facts Table (NFT). As we get closer to the 2021 compliance deadline, more and more manufacturers are beginning to update their labels to reflect the new requirements. Changes to the LOI and NFT are all part of Health Canada's healthy eating strategy which encompasses many initiatives: revising Canada's food guide, restricting marketing to children, introducing front-of-package (FOP) nutrition labelling and improving the nutrition quality of food.

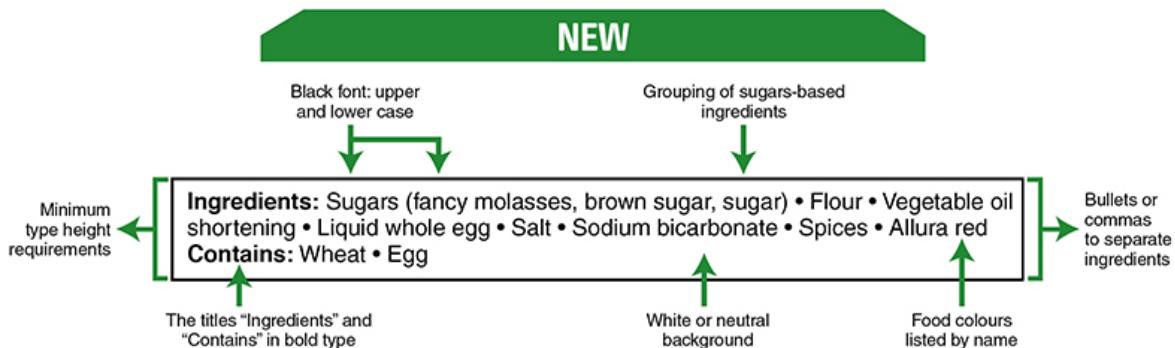
#### What is the timing?

The LOI and NFT format changes required for food labels must be made prior to December 14, 2021. However, as proposed in Canada Gazette I, the finalization of FOP labelling may bring an additional year to bring labels into compliance.

#### What's changed?

The changes to the LOI include:

- Grouping of sugars-based ingredients in brackets after the name "Sugars"
- Listing food colours by their individual common names
- Making the text in black font on a white or neutral background
- Creating minimum type height requirements
- Using bullets or commas to separate ingredients
- Using both upper and lowercase letters for the ingredients in the LOI



The new NFT keeps a lot of its former aesthetic but has some significant changes that include:

- Making serving sizes consistent and realistic
- Making the serving size and Calorie information easier to find and read
- Adjusting the % Daily Value (DV) to reflect updated science, including a new %DV for sugars based on a total intake of 100 g of sugars per day
- Adjusting the nutrients included in the NFT to remove vitamin A and vitamin C and to add potassium

- Adding a footnote to the NFT about %DV that will help consumers understand how much of a nutrient is in their food based on 5% or less is a little, and 15% or more is a lot

### How does this impact honey?

For honey sold both in retail and in bulk, there are some exceptions to the requirement to group sugars in the LOI and one of these exceptions apply to honey that is packed and sold as such (e.g., pure honey). For single ingredient foods like honey, the common name (e.g., honey) is also considered to be the LOI. But if a separate ingredient list is included on a honey label, or if it is not a single-ingredient honey (e.g., flavoured honey product) then the new requirements, outlined above, would have to be incorporated.

For retail honey, below is an example of what the new NFT will look like for consumer prepackaged honey products. The exact format and size of NFT required for an individual product would depend on its Available Display Surface (ADS), <http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/nutrition-labelling/ads/eng/1389222405345/1389222476367>, and the full range of NFT options can be found in the Directory of Nutrition Facts Table Formats, <https://www.canada.ca/en/health-canada/services/technical-documents-labelling-requirements/directory-nutrition-facts-table-formats.html>

Canadian Honey Council will be providing the below NFT template on the council's website for packers to use on consumer prepackaged honey. As a reminder, manufacturers are solely responsible for ensuring compliance of their labels, including the Nutrition Facts Table, to all relevant regulations and should continue to monitor the Canadian Nutrient File for any updates that may impact declared values.

<b>Nutrition Facts</b>	
<b>Valeur nutritive</b>	
Per 1 tbsp (20 g) / par 1 c. à soupe (20 g)	
<b>Calories 60</b>	% Daily Value* % valeur quotidienne
Fat / Lipides 0 g	0 %
Carbohydrate / Glucides 16 g	
Sugars / Sucres 16 g	16 %
Protein / Protéines 0.1 g	
Potassium 10 mg	1 %
Iron / Fer 0.1 mg	1 %
Not a significant source of saturated fat, trans fat, fibre, cholesterol, sodium, or calcium.	
Source négligeable de lipides saturés, lipides trans, fibres, cholestérol, sodium et calcium	
*5% or less is a little, 15% or more is a lot *5% ou moins c'est peu, 15% ou plus c'est beaucoup	

### Bilingual Simplified Standard Format NFT, Fig 6.1(B)

Source: Canadian Nutrient File, Food Code #4294 Sweets, honey, strained or extracted, updated 2018-02-06.

For bulk honey, honey that is not offered for sale as a consumer prepackaged product, B.01.404(1) FDR Foods for Use in Manufacturing Other Foods, should be followed and nutrition data provided to the purchaser on a per 100 g basis. Please refer to the links below for additional guidance.

This article is not intended to provide Legal or Regulatory guidance, for more information on the food labelling changes outlined here or to seek more information in ensuring label compliance, please visit the following sites:

<https://www.canada.ca/en/health-canada/services/food-labelling-changes.html>

<http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/eng/1383607266489/1383607344939>

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