



## SUBMISSION TO HEALTH CANADA'S PROPOSED APPROACH TO INTRODUCE MANDATORY FRONT-OF-PACKAGE (FOP) LABELLING REQUIREMENTS

TECHNICAL QUESTIONNAIRE ON FRONT-OF-PACKAGE NUTRITION LABELS.

<http://healthycanadians.gc.ca/health-system-systeme-sante/consultations/labels-nutrition-etiquetage/questionnaire-eng.php>

Submitting as Industry Representative

### **1. Do you support Health Canada's proposed nutrient-specific "high-in" front-of-package labeling approach? Please explain.**

The Ontario Beekeepers' Association represents Ontario's 3,000 beekeepers and 100,000 colonies producing 4,000 tons of honey annually. Honey bees are essential for the production of Ontario fresh fruits, vegetables and oilseeds including apples, apricots, cherries, blueberries, nectarines, peaches, raspberries cucumbers, soybeans, and mustard seeds to name a few.

As producers of natural, unprocessed 100% Ontario Honey, the OBA is in favour of helping consumers make better food choices and identify healthier products.

### **2.1a. Do you support Health Canada's proposed thresholds for triggering front-of-package labeling? Yes or no. Please explain.**

An appropriate threshold should trigger the FOP label on foods that contain relatively high levels of one or more nutrient of concern, particularly packaged, processed foods where the nutrients of concern may be hidden.

In this regard we are *not* including honey that is used as an added ingredient in processed foods, most commonly in combination with refined sugars. We do not wish to confuse the use of honey as an added ingredient with 100% Ontario or 100% Canadian honey, which are sold as natural, unprocessed foods with health benefits that could be recommended as part of a healthy diet when used in moderation.

Even so, we do not believe reference amounts applies to pure natural 100% Ontario or 100% Canadian honey where consumption is typically limited to one or two teaspoons a serving, the equivalent of 4 to 8 grams of sugar.

### **2.1b. If your answer to 2.1a is "no", please suggest alternative thresholds along with a rationale and evidence to support your proposal.**

We believe 100% Ontario honey and 100% Canadian honey, a pure, natural food whose purpose as a sweetener is clearly understood by consumers, should be exempted from FOP regulations.

**2.2a Do you support Health Canada's proposed approach for foods with small reference amounts? Yes or no. Please explain.**

We agree that foods with small reference amounts should not trigger the FOP label.

Although we would maintain that honey is healthier than the examples provided for possible exemption of condiments, coffee cream, butter and cookies, we think that honey meets the criteria suggested related to small reference amounts.

Most frequent uses of honey would include one or two teaspoon to sweeten tea or coffee, or spread on toast.

**2.2b If your answer to 2.2a is "no", please suggest an alternative approach along with a rationale and evidence to support your proposal.**

**2.3a Do you support Health Canada's proposed approach to exempt foods from front-of-package labeling if the current *Food and Drug Regulations* do not require the food to carry a Nutrition Facts table? Please explain.**

We agree that foods that are currently exempt from nutritional labeling should continue to be exempt. For honey, that includes small packets for restaurant use, small jars under 150 gm. as well as honey sold from farm gate and farmer's markets.

**2.3b Do you support Health Canada's proposal to exempt packages of sugar and salt from front-of-package labeling? Please explain:**

And honey as well.

**3a. Do you support Health Canada's approach to choosing a front-of-package symbol for foods high in sodium, sugars and saturated fat? Please explain.**

We believe 100% Ontario Honey and 100% Canadian Honey are pure, natural unprocessed sweeteners that should be exempted from FOP regulations.

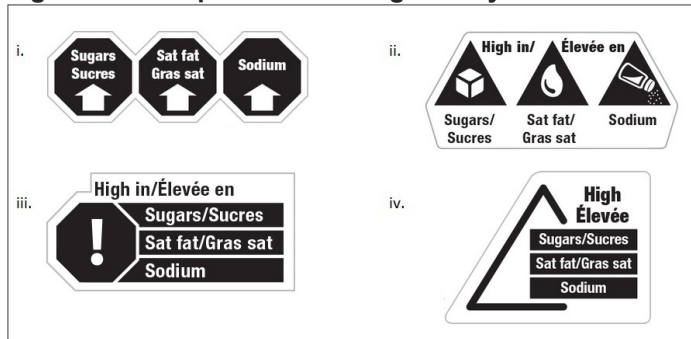
There are already significant labeling requirements for honey labels including colour of honey, grade, content in grams, name and address of producer and geographic source of honey. Much of this is required in two languages. Jars of honey are usually sold in sizes ranging from 250 gm. to 500 gm., and sometimes in small specialty bottles such as honey bears. Another category of information on the front label would make it almost impossible to develop effective branding or express differentiation such identifying the plant source of honey. Canada's honey producers would be put at a competitive disadvantage to low-cost imported honey in a crowded and competitive marketplace. The proposed FOP label would add yet another barrier for this struggling Canadian agricultural industry.

It would be far more helpful to consumers – and the Canadian honey producing industry – to tighten up requirements for labeling the geographical source of honey. Consumers who believe they are buying Canadian honey under the Canada No.1 label and who may actually be buying imported honey, (which in some cases may not actually *be* honey) are having their healthy choices compromised.

**3b. Which symbol shown in Figure 1 below would best help inform Canadians about foods high in sodium, sugars and saturated fat? Please explain.**

100% Ontario Honey and 100% Canadian Honey are pure natural unprocessed foods that should be exempted from FOP regulations.

**Figure 1: Examples of FOP "high in" symbols under consideration by Health Canada**



**Figure 1 - Text Equivalent**

**3c. If you do not agree that any of the symbols in Figure 1 would help inform Canadians, please propose an alternative symbol along with a rationale.**

Application of any of the FOP symbols creates the consumer impression that 100% Ontario and 100% Canadian honey may be as unhealthy as other free sugars that fall under the FOP requirement. Natural unprocessed 100% Ontario and 100% Canadian honey, when part of a healthy diet and used in moderation, represent a healthy alternative to processed sugars, high density sweeteners and foods with added sugar. Labeling 100% Ontario and 100% Canadian honey in the same manner and symbology of refined sugar and corn syrup sweetened products will confuse consumers' perception of honey as a natural sweetener without added sugar and may drive a decline in honey consumption. A decline in the demand for 100% Ontario and 100% Canadian honey may spark a corresponding drop in honey prices.

The sustainability of Ontario beekeeping is already in question. For the past ten years, Ontario beekeepers have faced higher production costs and depressed harvests. This additional detrimental effect of including honey with refined sugar and corn syrup in FOP requirements could cause economic stress on Ontario beekeepers who rely on the income from their honey crop. This may well cause some beekeepers to increase the pollination price paid by fruit and vegetable growers to sustain their businesses, leading to higher costs for fruits and vegetables for consumers and a likely drop in consumption.

In conclusion, 100% Ontario and 100% Canadian honey is a natural unprocessed food that has been part of Ontarians' healthy diets for over 200 years. Beekeeping is an agricultural industry that produces and delivers a natural food, as well as pollination services necessary for the adequate production of our locally grown fruits and vegetables.

*FOP labeling requirements imposed on 100% Ontario and/or 100% Canadian Honey will mislead consumers, create additional hardships for our beekeeping industry and have a domino effect that will threaten Ontario's supply of the fresh, locally grown fruits and vegetables necessary for a healthy diet.*

**4a. Do you support the changes proposed to update claims and other nutrition-related**

**statements described in Table 3? Please explain.**

100% Ontario Honey and 100% Canadian Honey are a natural unprocessed source of nutrition and therefore the concept of no added sugar or sweeteners etc. does not apply.

**4b. If you do not support one or more of the proposed changes, please identify the subject of the proposed change (e.g., "i. no added sugar" claim) and explain why, along with a rationale and evidence to support your comments.**

We believe pure, natural 100% Ontario and 100% Canadian Honey should be exempt from FOP labeling for the reasons stated above.

**5a. Do you support the changes proposed to eliminate the requirements for the principal display panel declaration and the quantitative declaration on foods containing sucralose, acesulfame-potassium and neotame? Yes or no. Please explain.**

Not applicable to honey

**5b. If your answer to 5a. is "no", please provide your recommended approach along with a rationale and evidence to support your proposal.**

Not applicable to honey

**5c.**

**If you are someone who either has phenylketonuria (PKU), cares for someone with PKU, or provides dietetic advice to those with PKU, what are your views concerning the principal display panel and quantitative declaration labelling requirements for aspartame?**

Submitted electronically January 12, 2017