

Food labelling modernization – what consumers want

Canada's food laws are undergoing a major overhaul. Through the CFIA's Food Labelling Modernization Initiative, and Health Canada's Regulatory Roadmap for Health Products and Food, the government is tackling an ambitious portfolio of legislative changes, which include modernizing our food labelling regime. One of the biggest challenges with this initiative will be balancing the wants and needs of a diverse Canadian population with the practical realities of what government, industry and science can deliver.

Two recently published reports on consumer perspectives highlight some of the complex issues involved. Advertising Standards Canada's (ASC) *2013 Consumer Perspectives on Advertising* provides the results of a survey of over 1,500 Canadians, and the Consumers Council of Canada's (CCC) *Food Information, Labelling and Advertising* reports the findings of a panel of six Canadian consumer groups.

ASC's report indicates that consumers want to be informed about products, but don't want to be misled by claims that aren't accurate or truthful. CCC's report outlines eight key recommendations to help better serve consumers. These recommendations include mandatory labelling for foods that have been irradiated, produced using nanotechnology or contain genetically modified organisms (GMOs), and disclosure of



quantities of highlighted ingredients. The report also outlines that consumers want food labels to help them make informed choices, but that the cost of labelling and advertising must not impose undue financial burden on consumers.

Seems straightforward, but the challenge lies in the fact that collectively what consumers want can be contradictory. For example, based on the ASC survey, 85 per cent of Canadians take issue with advertising text that is too small to read — but who determines what is too small? Studies indicate, for example, that more than half of seniors have difficulty reading labels properly, even when wearing corrective lenses. How can industry add mandatory statements and more health information while also increasing the legibility of text?

More information can also be confusing. Since the introduction of mandatory labelling for allergens, it is common to see “may contain” statements indicating that an allergen may be present in a food. Some consumers find this confusing, but with modern scientific testing techniques that can find allergens at increasingly minute amounts, industry is put in a difficult position, as a failure to indicate the potential presence of an allergen can lead to a costly recall if one is found. Labelling for allergens is mandatory due to the premise that undeclared allergens pose a health risk. However, where a safety or public health concern has not been identified, the need for mandatory labelling should be given careful consideration. Is it really helpful to consumers to see products



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labelled “May contain GMOs” where it is just too costly or logistically difficult for manufacturers to confirm that all ingredients are not GMO? Even truthful information has limited utility without context.

It is also important to remember the economic impact of introducing labelling requirements, as the increased costs of compliance will be passed on to the consumer. While some consumers are willing and able to pay a premium to more easily compare products or know that the foods they consume are non-GMO, mandatory labelling schemes force all Canadians to absorb the additional costs.

Looking at the success of the organic certification regime, perhaps what consumers really need are more voluntary labelling standards, especially where the information is not crucial in the evaluation process for a majority of Canadians and does not aid in assessing the safe consumption of the food. Canadians could also benefit from education to help inform their decision making and build confidence in our food regulatory system. Given that the government has made a clear commitment to modernizing Canada's food labelling laws, it is important for industry to work closely with regulators to ensure that focus is put on areas and initiatives that will bring meaningful change for consumers as a whole. 🍎

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