

☀ Food labels: multi-tasking

Food labels, like an overcoat designed to endure the vagaries of a cruel Canadian winter, must multi-function in simultaneous fashion. First and foremost is product protection, forming a barrier against moisture, oxidation, debris, tampering, contamination and infestation, to name a few hazards, while ensuring ease-of-access to the food inside. The second and third functions – provision of product information and an advertising platform – transform a food label into a primary source of real estate. Federal legislation, the world over, has first dibs.

☀ Mandatory label information: Me first!

An experienced food label designer will first allot the label space required to fulfill legislated information requirements, such as product name, net contents, ingredient statement, nutrition information, and product steward name and domicile. Some processed foods require additional information such as an expiry date for infant formula. In Canada, the mandatory French language label space is assigned 20% more area than that occupied by the English, which is the average result when English words are translated to French. The remaining label space is available to the manufacturer in which to highlight and emphasize select product attributes, also subject to legislation, as all label copy must be truthful and non-misleading.

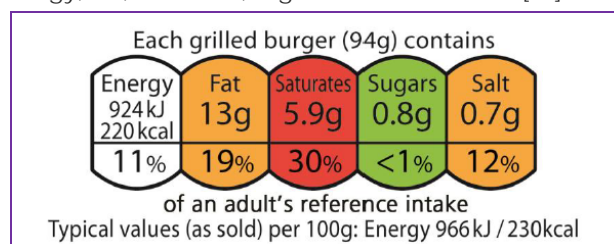
☀ Federal encroachment

In 2016, federal regulators in both the USA and Canada advanced further upon the food label patch. In some cases, the amendment is consumer driven, such as the finalized [Mandatory GM labelling in the USA](#), and, the CFIA's [Food Labelling Modernization](#) - currently in a pre-regulatory consultation phase, which covers Country of Origin Labelling for all imported food; a quantification of any ingredient emphasized on the front panel; unambiguous best before dates; minimum font size for all mandatory information; and electronic (email address) manufacturer contact information. In the case of Health Canada's [proposed FOP \(Front-of-Pack\)](#) declaration of a food's saturated fat, sodium and sugars content, the initiative is a regulator-driven, social-intervention aligned with departmental objectives.

☀ UK: upfront colour-coded FOP

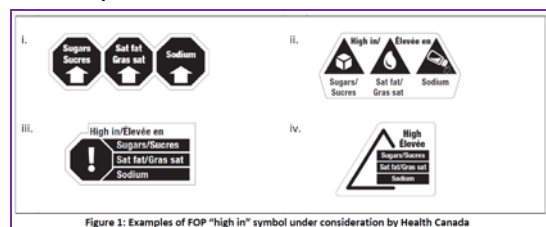
In 2013, under the [Obesity and Healthy Eating Program](#), the UK launched a mandatory FOP:

"(FoP) nutrition label format combining red, amber and green colour-coding, nutritional information and percentage reference intakes [...] to display the amount of energy, fat, saturates, sugars and salt in food [...]":



☀ Canada: % DV aligned FOP symbols

Health Canada's FOP proposal stems from a 2016 parliamentary committee report [Obesity in Canada](#) which "recommended that the federal government undertake a regulatory approach to mandate the use of FOP labelling on prepackaged foods". The proposed bilingual FOP regime provides the regulator with a piece of food label primary real estate, intended to transform it into a public health tool aligned with departmental food and nutrition policy. As with the new Nutrition Facts Table (NfT), which bears a footnote which places % DV's into context ($\leq 5\%$ DV is a little; $15\%+$ DV is a lot), the proposed black-and-white FOP is triggered by the same thresholds – a food containing 15% or more of the DV for each of saturated fat, sodium and sugars need bear a "high in" FOP statement to that effect, and a "low in" claim when the respective DV's are 5% or less:



FOP's are expected to become mandatory when the new NfT comes into force, December 2021. **FF**