

RECOMMENDATIONS

Recommendation 1

CIAI research has identified problems with the readability of the mandatory elements of labels on a wide selection of food items available in Canada. CIAI recommends the establishment of a stakeholder group to produce guidelines for the readability of mandatory food labelling that will operationalise the current legislative requirement for mandatory information on food labels to be “*clearly and prominently displayed and readily discernible to the purchaser or consumer under the customary conditions of purchase and use*”. This stakeholder group should include government, industry and consumer representation.

Recommendation 2

Once the new guideline suggested in recommendation #1 has been completed, CIAI recommends that the marketplace be monitored for consistency with the new guidelines. If there is no measurable progress in making mandatory information on food labels easier to find and read, then further regulations for the formatting and print clarity of mandatory food label information should be introduced.

Recommendation 3

To reduce the burden of understanding multiple systems, CIAI recommends that Canadian regulations be made consistent with the information order rules of the US on the placement of some of the mandatory information on food labels. CIAI recommends that Canadian requirements be established for an information panel, which would group some of the mandatory food label information together in a single prominent position with no intervening material. This information panel should include, at a minimum, the nutrition facts table, the list of ingredients, instructions for safe storage and the address of the manufacturer/importer.

Recommendation 4

During the research on the readability of mandatory food labels, the focus groups and volunteer advisory committee raised several issues relating to food labelling that, while not connected with the purpose and objectives of this study, CIAI believes are worthy of future study and/or research. These issues include;

- Completion of the work on mandatory allergen labelling in order to provide Canadians with protection that equals or exceeds that of our trading partners;
- Study of the US requirements for the mandatory identification of the manufacturer/importer of food items with a view to harmonization;
- Examination of the adequacy of Canadian requirements on labelling relating to the safe storage and handling of food.

Note to Recommendation 4:

While non-mandatory dietary and allergen information is a significant health and welfare concern for many consumers, this report does not address the failures in providing that information: the report only addresses the readability of information currently mandated. Where the focus group participants provided unsolicited comments on the presence or absence of specific label content these are included within the final report as possible areas for future research.