



## Consumer Interest Alliance Inc.

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### **Proposed Draft Amendment to the General Standard for the Labeling of Prepackaged Foods (Quantitative Ingredient Declaration Labeling.**

#### **Comments of the Consumer Interest Alliance Inc.**

**December 28, 2005**

The Consumer Interest Alliance Inc.,(CIAI), appreciates having the opportunity to submit comments in response to the CODEX draft amendment designed to provide important information to consumers.

#### Highlighted or Emphasized Ingredients

Quantitative ingredient declaration (QUID) on food labeling is very important to consumers. Consumers are becoming more dependent on prepackaged foods. Visual inspection does not always provide information about the relative contribution of specific ingredients. The ingredient list does not indicate the amount of a particular ingredient that is in the combination food (i.e. how many lentils are in the lentil soup).

For the consumer QUID provides information to facilitate

- product comparisons on the basis of quality by informing consumers which product contains the greatest amount of desirable ingredients (whole grains in whole grain cereal, beans in baked beans, juice in drinks made with 'real juice', peaches in canned peaches etc.)
- the selection of healthier food choices by providing information about the percentage of healthful or unhealthful ingredients that a food contains
- avoidance of economic adulteration by providing information about the amount of water or inferior ingredients in a product;
- understanding of the contribution of ingredients highlighted in pictures or words on the label (i.e. the amount of cheese in cheese sandwich crackers)
- the development of higher quality products.

The CIAI supports Quantitative Ingredient Declaration (QUID). For combination pre-packaged foods CIAI supports the draft amendment 5.1.1. (a) and (b) that quantitative information (percentage by weight) be provided for other ingredient (including ingredients of compound ingredients (i.e. cheese ingredients) whose presence is emphasized by words or pictures on the label or in advertising; is essential to characterize the food and is essential to distinguish the food from others with which it may be confused. CIAI requests that Canada request for (c) the removal of the [ ] around appears / is in the name of the food and delete the rest of the sentence.

The requirement for all multi-ingredient foods to disclose in the ingredient list the percentage by weight of each ingredient (including ingredients of compound ingredients) comprising more than 5% of the food by weight is preferable to a number of or/or/ors. For consumers this requirement would be most informative. This provision would allow for the sections (c), (d), and (e) to be deleted.

QUID provides useful information in addition to mandatory nutrition labeling which enhances informed choice. For example, the % whole grains or the % added sugar found in cereals. In Thailand, which enforces comprehensive QUID labeling, the label for Kellogg's Frosties cereal indicates that more than one third of the box is added sugar (39%); whereas, in Canada the ingredient list names sugar and fructose as the second and fourth ingredients respectively. The International Association of Consumer Food Organizations 2001 document entitled Quantitative Ingredient Declaration (QUID) on Food Labeling—Promoting Consumer Health and Preventing Unfair Trade Practices contains a number of illustrations of comparisons of products using QUID.

If the product bears a name or other similarity to another food with different ingredient composition or an ingredient or class of ingredients is normally associated with the food by consumers the product should also be subject to the provisions of quantitative ingredient labeling. This provision is necessary because labels often imply that the product contains significant amounts of a desirable ingredient or ingredients but these ingredients may be present in trivial amounts. **Ideally, highlighting of positive ingredients that are present in small amounts should be prohibited.** The use of an ingredient name in a food that contains insignificant amounts of the food (i.e. the use of cheese in the description of the food if there is less than 1% cheese in the product) should be prohibited or required to be labeled as “cheese flavoured”. CIAI does not agree that ingredients comprising less than [2% 5%] of the total weight to be excluded if the ingredient is emphasized on the label unless it is clear to the consumer that the product is ‘flavoured’ with that ingredient.

CIAI also recommends that Canada support when any ingredients are emphasized on a food label or in advertising by words, pictures or graphics the label shall indicate the

percentage by weight of the emphasized ingredients **beside** the emphasized words or pictures or beside the common name of the food. *Where highlighted ingredients may be on the principal display panel, the percentage by weight of the ingredient be displayed next to the claim.* CIAI's preference is to have the information on the display panel **and** in parenthesis in the ingredient list.

The last paragraph of 5.1.2 is unclear.

Features of the label such as placement, language, punctuation, topography and grammar influence how consumers interpret label information. Statements on food labels are sometimes qualified. Consumers may be misled if the qualification is in fine print or is placed in a location where consumers are unlikely to notice it.

For further information contact

Theresa Courneyea, President, CIAI  
416-657-1756    tcourneyea@sympatico.ca