



## **Newfoundland & Labrador Beekeeping Association**

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Health Canada  
Bureau of Nutritional Sciences  
Health Products and Food Branch  
251 Sir Frederick Banting Driveway  
Mail stop 2203E  
Ottawa, ON K1A 0K9

### **Re: Proposed front-of-package labelling**

I write to you on behalf of the Newfoundland and Labrador Beekeeping Association (NLBKA). We are a newly established association representing both commercial and hobby beekeeping interests in the province. There are currently five commercial or side-line operators in the province who retail honey domestically, and therefore, label their honey and other honey bee products in various ways. We expect that several other beekeepers will be labelling and selling product at some point in the near future as their operations expand.

In light of the fact that we produce honey and other honey bee products, which for some of our members requires labelling for retail sales, we have serious concerns about Health Canada's proposed labelling requirements. We are in communication with the Canadian Honey Council (CHC) and other beekeeping associations about this matter.

#### **1. Exempt honey from the FOP proposal**

We agree with CHC's objection, that "[r]equiring a saturated fat content FOP symbol on single macronutrient foods creates the erroneous impression regarding composition. In addition, the FOP information would duplicate information currently on the ingredient list, a factor recognized by Health Canada when proposing to exempt sugar and salt packages from FOP requirements.

Application of any of the FOP symbols proposed creates the impression among citizens that 100% Newfoundland and Labrador or 100% Canadian honey may be as unhealthy as any other free sugars that fall under the FOP requirement. Natural, unprocessed 100% Newfoundland and Labrador 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. Labelling 100% Newfoundland and Labrador or 100% Canadian honey in the same manner and symbology of refined sugar and corn syrup sweetened products will confuse citizen's perceptions of honey as a natural sweetener without added sugar and may result in a decline in honey consumption. Here in Newfoundland and Labrador, we want to encourage increased use of honey and other honey bee products not discourage it through alarmist and confusing symbology.

*The NLBKA requests that single ingredient, single macronutrient foods like honey be exempt from the FOP proposal.*

## **2. Avoid use of arbitrary values not supported by clinical evidence**

Given that the Health Canada recommendations for quantitative sugar intake as part of a healthy diet are based on subjective diet modelling and food intake surveys, *the NLBKA asks that Health Canada commission a robust clinical quantitative evaluation of the impact of sugar intake on excess calorie consumption and nutrient displacement as well as associated determinants of health to determine a scientifically supportable %DV for sugars in the Canadian diet.*

Like the CHC, we also object to the use of subjective terms such as ‘high-in’ as they do little to inform people about how to evaluate between products with similar labels.

## **3. Natural sugars contain health-related nutrients not present in other sugar sources**

The CHC notes that the current FOP proposal makes allowance for different ‘triggers’ for products in a nutrient category that would be a healthier choice (i.e., identification of saturated fat oils versus other fats deemed part of a healthy lifestyle). In the same way that dietary fats are not all equal, honey offers health related benefits not present in refined sugar.

*NLBKA would like honey and other natural sources of sugar to be exempted from any FOP trigger calculation.*

## **4. Need for an “indication of business impact” assessment**

The CHC notes that across Canada a reduction in the sale of honey because of FOP “warnings” could be detrimental to our shared goal of helping Canadians make healthier food choices. In addition to the potential impact on food availability, consideration should be given to the potential impact on the economy. In 2014, over \$10 billion dollars of bee pollinated crops were sold by Canadian farmers.

*NLBKA supports the CHC’s request that Health Canada conduct an “indication of business impact” assessment before applying proposed FOP changes to honey and honey-containing products.*

## **5. Improve requirements for labelling the geographic source of honey**

Rather than burdening Canadian beekeepers with alarmist and confusing labelling requirements, it would be far more helpful to people in our province as well as elsewhere in Canada to improve requirements for labelling the geographic source of honey. Citizens who believe they are buying Canadian honey under the Canada No 1 label, and who may actually be buying imported honey (or adulterated “honey” in some cases), are having their healthy choices compromised.

Like the CHC, we recognize the importance of providing Canadian citizens with information they need to make healthy food choices. We also believe that having Canadian grown and processed foods and food ingredients widely available is an important aspect of public health, and that supporting the domestic production of honey bee products is extremely important to the long-term food security of Newfoundland and Labrador as well as the rest of Canada. The proposed front-of-package symbols have the potential to add even more confusion regarding food choices for our citizens. Current nutrition facts tables and ingredient listings clearly indicate the information required to make informed choice.

The proposed changes are unnecessary, potentially costly to beekeepers, and may have unintended negative consequences for beekeepers as well as other Canadian citizens.

Thank you for your attention to this matter.

Sincerely,

*Catherine Dempsey*

Catherine Dempsey,  
President NLBKA

c.c. Kevin Nixon & Rod Scarlett, Canadian Honey Council  
Jim Coneybeare, Ontario Beekeepers' Association  
Karen Kennedy, Department of Fisheries, Forestry and Agrifoods, Government of  
Newfoundland and Labrador