



July 27, 2010

The Honourable Leona Aglukkaq  
Federal Minister of Health  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
Postal Locator: 0906C  
Ottawa, ON K1A 0K9

Dear Minister Aglukkaq:

**Subject: Labelling of Caffeine Content in Prepackaged Foods**

On June 23, 2010, the Board of Health for the North Bay Parry Sound District Health Unit passed the following resolution:

**Resolution #BOH/2010/06/04**

*Whereas, At its June 23<sup>rd</sup>, 2010 meeting, the Board of Health for the North Bay Parry Sound District Health Unit considered Report No. 051-10 Re-Labelling of Caffeine Content in Prepackaged Foods, adopted by the Board of Health for the Middlesex-London Board of Health at their April 15<sup>th</sup>, 2010 meeting, and endorsed the following recommendations; and*

*Whereas, Caffeine in its natural and added forms is found in a growing list of products including coffee, tea, cola beverages, "energy" drinks, chocolate, and some medications; and*

*Whereas, Caffeine intakes above certain levels may have adverse effects on adults and may increase the risk for possible behavioural effects and sleep disturbances in children and adolescents; and*

*Whereas, Women of childbearing age are advised to limit their caffeine intake; and*

*Whereas, Health Canada recently announced it is authorizing the use of caffeine and caffeine citrate as a food additive in all carbonated soft drinks, not just cola beverages; and*

*Whereas, There is currently no regulatory provision for mandatory quantitative labelling of caffeine (e.g. caffeine content: \_\_ mg per "stated serving size") nor is there a requirement to identify the quantitative amount of caffeine in composite food containing ingredients that are natural sources of caffeine to allow consumers to accurately determine their daily caffeine intake;*

*Now Therefore Be It Resolved, That the Board of Health for the North Bay Parry Sound District Health Unit supports the Report No. 051-10 Re-Labelling of Caffeine Content in Prepackaged Foods prepared by the Middlesex-London Health Unit and also opposes the addition of caffeine and caffeine citrate in non-alcohol carbonated water-based flavoured sweetened beverages; and call on the Food Directorate of Health Canada to make mandatory, specific caffeine content statements directly on food labels; and*

*Furthermore Be It Resolved, That based on several nutrition issues of public health concern (caffeine, sodium, trans fat, discretionary fortification, vitamin D, commercial marketing of food and beverages to children), that the Board of Health advocate to the Federal Minister of Health for legislation and regulations as part of a coordinated national plan for key food and nutrition issues, and*

*Furthermore Be It Resolved, That a copy of this resolution be forwarded to local members of federal and provincial government and to Ontario Boards of Health.*

Respectfully yours,

*Original signed by*

Mac Bain, Chairperson  
Board of Health

Enclosure (1)

- c: Honourable Tony Clement, MP, Parry Sound-Muskoka
- Honourable Monique Smith, MPP, Nipissing
- Anthony Rota, MP, Nipissing-Timiskaming
- Norm Miller, MPP, Parry Sound-Muskoka
- David Ramsay, MPP, Timiskaming-Cochrane
- Ontario Boards of Health

2010 April 27

The Honourable Leona Aglukkaq, MP  
Federal Minister of Health  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
Postal Locator: 0906C  
Ottawa, Ontario K1A 0K9

Dear Minister Aglukkaq:

At its April 15<sup>th</sup>, 2010 meeting, the Middlesex-London Board of Health considered **Report No. 051-10 re Labelling of Caffeine Content In Prepackaged Foods**, and requested that a letter be sent to you strongly recommending that should the addition of caffeine and caffeine citrate in non-alcoholic carbonated water-based flavoured sweetened beverages (i.e. carbonated "soft drinks") be approved, Health Canada mandate the food industry to provide specific caffeine content statements directly on the labels of products with added caffeine and caffeine citrate and to also advocate for a coordinated national plan for key food and nutrition issues.

The recent issue of adding caffeine to non-cola carbonated soft-drink beverages is but one of several current nutrition concerns Canadians are faced with. Food nutrient awareness and the nutritional content in prepared foods extend far beyond caffeine. Addressing healthy eating as the overall goal for all Canadians includes messaging and awareness about many nutrition issues including but not limited to the sodium content in processed foods, the prevalence of trans fats in the food supply, commercial food advertising to children, excessive caloric intakes due to disproportionate serving sizes provided in both packaged and commercially prepared foods, and limitations in the current food labeling system.

While it is important to flag for consumers how to be aware of the nutritional content of the foods they choose in their diets, equally important is the need for legislation and regulations from relevant provincial and federal agencies to ensure that supportive environments and healthy public policies create opportunities for consumers to ensure their healthiest choices are also the easiest ones to make.

In response to these individual nutrition issues that continue to arise, there is a pressing need for a comprehensive and coordinated national food and nutrition policy which would underscore these key food and nutrition issues that continue to be of concern to the health of Canadians from coast to coast to coast.

Recently in London, ON, key stakeholders from all levels of government, academia, and food industry met to discuss the possibility of developing a national food policy. It is strongly encouraged that Health Canada facilitates this process and becomes a champion in ensuring the development and support of this integral strategy in service of protecting the health and well-being of Canadians.

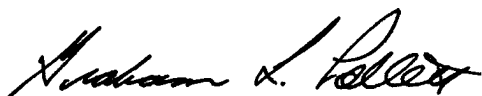
2010 April 27

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The Honourable Leona Aglukkaq, P.C., M.P.

If you require additional information, please contact Ms. Heather Thomas, Dietitian, Chronic Disease and Injury Prevention Team, at (519) 663-5317 ext. 2222.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Graham L. Pollett". The signature is fluid and cursive, with the first name being the most prominent.

Graham L. Pollett, MD, MHSc, FRCPC  
Secretary-Treasurer  
Middlesex-London Board of Health

Encl.

c.c. Mr. James Reffle, Director of Environmental Health and Chronic Disease Prevention Services  
Ms. Mary Lou Albanese, Manager, Chronic Disease and Injury Prevention Team  
Ms. Heather Thomas, Dietitian, Chronic Disease and Injury Prevention Team  
Ontario Health Units  
Local MPPs and MPs

2010 April 27

Health Canada  
Bureau of Chemical Safety  
Tunney's Pasture  
Postal Locator: 2203B  
251 Sir Frederick Banting Driveway  
Ottawa, ON K1A 0L2

To Whom It May Concern:

At its April 15<sup>th</sup>, 2010 meeting, the Middlesex-London Board of Health considered **Report No. 051-10 re Labelling of Caffeine Content In Prepackaged Foods**, and requested that a letter be sent opposing the introduction of caffeine and caffeine citrate in non-alcoholic carbonated water-based flavoured sweetened beverages (i.e., carbonated "soft drinks").

Canadian adults consume caffeine primarily in coffee (60%), tea (30%) and carbonated beverages, chocolate products, and medicines (10%). Canadian children, on the other hand, consume the majority of caffeine from cola drinks (55%), tea (30%), chocolate (14%), with the remaining amount coming from other sources including medications. A major concern public health nutrition professionals have with respect to caffeine consumption is that foods and beverages containing caffeine typically do not have significant nutritional benefits and may, in fact, increase an individual's risk for becoming overweight or obese if excessive amounts of these foods and beverages are consumed. Additionally, including caffeine in all carbonated soft drinks (cola and non-cola varieties) creates the opportunity for Canadians to increase their consumption of a stimulant that can cause insomnia, headaches, irritability, dehydration, and nervousness.

The recent announcement by Health Canada authorizing the use of caffeine and caffeine citrate as a food additive in all carbonated soft drinks, not just cola beverages is of great concern to health professionals at the health unit. There currently is no regulatory provision for mandatory quantitative labeling of caffeine, for example, a well-defined statement identifying the specific amount of milligrams of caffeine per stated serving size of food product (caffeine content: \_\_\_mg per "stated serving size"). There is also no requirement to identify the quantitative amount of caffeine in composite food containing ingredients that are natural sources of caffeine. Quantitative labeling of caffeine from all sources in foods would provide consumers with additional accessible information they can utilize to more accurately determine their daily caffeine intake.

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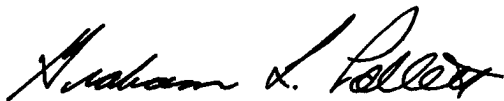
Health Canada

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On behalf of the Board of Health, we ask that stronger action be taken such as regulatory change to caffeine labeling on food labels to help Canadians make informed decisions about their caffeine consumption.

If you require additional information, please contact Ms. Heather Thomas, Dietitian, Chronic Disease and Injury Prevention Team, at (519) 663-5317 ext. 2222.

Yours sincerely,

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Graham L. Pollett, MD, MHSc, FRCPC  
Secretary-Treasurer  
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Encl.

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Ms. Mary Lou Albanese, Manager, Chronic Disease and Injury Prevention Team  
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Ontario Health Units  
Local MPPs and MPs



TO: Chair and Members of the Board of Health

FROM: Graham L. Pollett, MD, FRCPC  
Medical Officer of Health

DATE: 2010 April 15

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## **LABELLING OF CAFFEINE CONTENT IN PREPACKAGED FOODS**

### ***Recommendation***

*It is recommended that the Board of Health provide feedback to the Food Directorate of Health Canada:*

- i) opposing the addition of caffeine and caffeine citrate in non-alcoholic carbonated water-based flavoured sweetened beverages (i.e., carbonated “soft drinks”); and*
- ii) strongly recommending that should the addition of caffeine and caffeine citrate in these products be approved, Health Canada mandate the food industry to provide specific caffeine content statements directly on the labels of products with added caffeine and caffeine citrate; and*
- iii) advocating for a coordinated national plan for key food and nutrition issues.*

### **Background**

Caffeine is a natural ingredient found in the leaves, seeds, or fruit of many different plants including coffee, tea, cocoa, kola, guarana, and yerba maté. It is also manufactured and utilized as a food additive in some carbonated drinks and added as an ingredient in some medications including cold and headache preparations.

In terms of consumption patterns, Canadian adults consume caffeine primarily in coffee (60%), tea (30%) and carbonated beverages, chocolate products, and medicines (10%). Canadian children, on the other hand, consume the majority of caffeine from cola drinks (55%), tea (30%), chocolate (14%), with the remaining amount coming from other sources including medications. One concern public health nutrition professionals have with respect to caffeine consumption is that foods and beverages containing caffeine typically do not have significant nutritional benefits and may, in fact, increase an individual's risk for becoming overweight or obese if excessive amounts of these foods and beverages are consumed. Additionally, including caffeine in all carbonated soft drinks (cola and non-cola varieties) creates the opportunity for Canadians to increase their consumption of a stimulant that can cause insomnia, headaches, irritability, dehydration, and nervousness.

### **Changes in Regulations for Caffeine in Non-Cola Soft Drinks**

Health Canada recently announced it is authorizing the use of caffeine and caffeine citrate as a food additive in all carbonated soft drinks, not just cola beverages. Beverage companies will be allowed to add synthetic caffeine to non-cola soft drinks in concentrations no higher than 150 parts per million. Currently, the maximum amount of caffeine allowed in cola beverages is 200 parts per million. Health Canada contends that as long as consumers do

not exceed the maximum daily intake of caffeine, the amounts to be allowed in non-cola soft drinks will not pose any health risks. Unfortunately, messages about moderate intake of caffeine can be a difficult one for the general public to heed.

Furthermore, currently, there is no regulatory provision for mandatory quantitative labelling of caffeine, for example, a well-defined statement identifying the specific amount of milligrams of caffeine per stated serving size of food product (caffeine content: \_\_\_ mg per “stated serving size”). There is also no requirement to identify the quantitative amount of caffeine in composite food containing ingredients that are natural sources of caffeine. Quantitative labelling of caffeine from all sources in foods would provide consumers with additional, accessible information they can utilize to more accurately determine their daily caffeine intake. Health Canada is urging food manufacturers to quantitatively label caffeine when present in pre-packaged foods, including soft drink beverages. Advocacy to Health Canada demanding stronger action such as regulatory change to caffeine labelling on food labels is necessary to help Canadians make informed decisions about their caffeine consumption.

### **Implications for Consideration**

This current issue related to caffeine content in non-cola carbonated soft-drink beverages is of great importance for the nutritional concerns raised above. However, food nutrient awareness and the nutritional content in prepared foods extend beyond caffeine. Addressing healthy eating as the overall goal for all Canadians includes messaging and awareness about many nutrition issues including but not limited to the sodium content in processed foods, the prevalence of trans fats in the food supply, commercial food advertising to children, excessive caloric intakes due to disproportionate serving sizes provided in both packaged and commercially prepared foods, and limitations in the current food labelling system. While it is important to flag for consumers how to be aware of the nutritional content of the foods they choose in their diets, equally important is the need for legislation and regulations to ensure that supportive environments and healthy public policies create opportunities for consumers to ensure their healthiest choices are also the easiest ones to make. To this end, it is recommended that the Board of Health advocate for a coordinated national plan for key food and nutrition issues.

### **Conclusion**

It is recommended that the Board of Health send comments and feedback to the Food Directorate of Health Canada opposing the introduction of caffeine and caffeine citrate in non-alcoholic carbonated water-based flavoured sweetened beverages (i.e., carbonated soft drinks). However, if Health Canada moves forward with this regulation, it is strongly recommended that the Board of Health advocate to the Food Directorate and to the Canadian Food Inspection Agency to make mandatory, specific caffeine content statements directly on food labels. Finally, given the recent influx of individual nutrition issues such as caffeine, sodium, trans fat, discretionary fortification, vitamin D, menu labelling, and the commercial marketing of food and beverages to children, an overall coordinated national food and nutrition policy is of great need. It is recommended that the Board of Health correspond with the Federal Minister of Health advocating for a coordinated national food and nutrition policy underscoring key food and nutrition issues.

This report was written by Ms. Heather Thomas, Public Health Dietitian, Chronic Disease and Injury Prevention Team.

Graham L. Pollett, MD, FRCPC  
Medical Officer of Health

<p><b>This report addresses</b> the following requirement(s) of the Ontario Public Health Standards (2008): Foundational Standard 5, 8, 13; Chronic Disease Prevention 11, 12.</p>
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