



REGULATORYAFFAIRS

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What's in a Name?

Declaring a food as "healthy" isn't as simple as it sounds

We hear about it almost every day. The foods we eat are either "healthy" or not so "healthy." There's no room in between. With so much of our well-being governed by the word "healthy," you'd expect it to be defined by regulation. Yet unlike the U.S., this isn't the case in Canada. That's not to say that it's a free-for-all on the use of the word. And even though there is a solidly etched out definition, there are still strict prohibitions on its use. In fact, there are only a very few limited contexts in which the word "healthy," or variations thereof, can be used.

The newest and perhaps most widely regarded context for using the term "healthy" when describing foods, involves the five new dietary health claims relating to: stroke and heart disease with sodium, osteoporosis and calcium, heart disease and trans and saturated fat, cancer and fruits and vegetables, and dental carries and fermentable carbohydrates (for example, "A healthy diet rich in a variety of vegetables and fruit may help reduce the risk of some types of cancer.").

Another popular context involves health information campaigns by non-governmental organizations. In the latter case the term "healthy," its derivatives, or even heart symbols relate to the independent health organization and thus are not really "health claims." But even though they are not "official" endorsements for a particular food, they do carry a lot of influence with consumers.

There are also uses of the term "healthy" to describe a pattern of eating related to *Canada's Food Guide to Healthy Eating* and *Nutrition Recommendations for Canadians*. The health information campaigns used on food labels and advertising as mentioned above must also be consistent with these two guides. Outside of these contexts there really is not much more.

The references in the contexts described above refer to a healthy diet. Individual foods for the purpose of labelling and advertising may not be described as "healthy." Is it that Health Canada and the Canadian Food Inspection Agency do not believe foods are healthy? Our mothers, the higher authority on the matter, certainly taught us otherwise. In Canada "healthy" relates to the entire diet, and if used in another context is seen as violating prohibitions on making disease-like claims, something that is taboo! In the U.S., "healthy" is in fact not considered a health

claim, but an implied nutrient content claim, and it is defined by regulation.

A health claim in the U.S. must relate a food or substance thereof to a disease or risk factor for disease. Healthy nutrient criteria have been established for six categories of food: raw fruit and vegetables; single-ingredients or a mixture of frozen or canned fruits and vegetables; a standardized enriched cereal-grain product; a raw, single-ingredient seafood or game meat; a meal product or main dish product; and a food not specifically listed above. A cookie, for example, fits into the last category, and to be claimed as "healthy" would need to be low in fat and saturated fat, contain 480 mg or less sodium per reference amount and labelled serving size, 60 mg or less cholesterol, and at least 10 per cent of one of the following – vitamin A, vitamin C, calcium, iron, protein or fibre. The criteria for these food categories vary such that they better relate to the food in question. In this way the expression "healthy" is applied in a more meaningful manner.

I think our neighbours south of the border are onto something here. The word "healthy" is simple and easily appreciated. It doesn't need complex text that has to be read, explained and understood. Perhaps it's time to give up our obsession with the term "healthy" and instead define it as an implied nutrient content claim. One simple word could inspire the formulation of products that would limit fat, saturated fat, trans fat, sodium and cholesterol, and be a source of good nutrients. It could be the mother of all nutrient content claims.

One other point to consider: food that is claimed as low in fat could conceivably still be high in sodium or other less desirable nutrients. Under current Canadian regulations when a claim is made there is no requirement to provide a disclosure statement to alert consumers to these "not-so-healthy" nutrients when they are at levels beyond set thresholds. However, there is in the U.S.

Mom was right – some foods simply are healthy. Would it really be such a bad thing to have a Canadian definition that permits foods to make this claim?

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