



Ontario Public Health Association

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Position Statement on Menu Labelling

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POSITION STATEMENT

The Ontario Public Health Association (OPHA) commends the provincial government's proposal for menu labelling legislation that would require large chain restaurants to post calorie and other nutrition information on their menus/menu boards. The evidence linking excess calorie consumption to weight gain and excess sodium intake to high blood pressure is strong, with implications for population level obesity reduction and chronic disease prevention efforts. The OPHA strongly encourages inclusion of sodium values alongside calories in the provincial government's menu labelling initiative. Extending nutrition labelling into the restaurant environment, by providing key nutrition information at the point of purchase, is an important component of a comprehensive chronic disease prevention strategy.

Background

A growing number of organizations have recommended menu labelling legislation as a strategy to help improve the quality of the food environment, including the U.S. Institute of Medicine, Canada's Sodium Reduction Task Force, and in Ontario, multiple public health units, the Ontario Medical Association, Cancer Care Ontario, Public Health Ontario, the Ontario Society of Nutrition Professionals in Public Health, and most recently the Provincial Healthy Kids Panel in their 2013 report, *No Time to Wait: The Healthy Kids Strategy*.¹

OPHA's position statement is based on the evidence-informed positions of the Toronto Board of Health,² Toronto Public Health^{3,4} and the Ontario Society of Nutrition Professionals in Public Health (OSNPPH).⁵ These public health organizations have conducted extensive reviews of the most recent academic and grey literature on menu labelling and of the experiences of jurisdictions in the United States (U.S.) that have implemented menu labelling. Toronto Public Health has also conducted a public survey and primary research and consultations with the restaurant sector on menu labelling to inform their position. Seventeen Ontario public health units are actively advocating for calorie and sodium menu labelling legislation.

Rationale for the Position Statement

As families consume more of their meals outside the home, more attention is being given to addressing the association between eating out, poor nutrition and corresponding health concerns, such as obesity and hypertension. Some of the well-documented barriers to healthy eating out include large portion sizes, excessive levels of calories and sodium, misleading health claims, wide variations in the nutrient content of foods, and nutrition information that is hard to access. Menu labelling, with a focus on critical nutrition information, can improve the restaurant food environment by ensuring consumers are better able to make informed and healthier choices when eating out.

Consumers are increasingly becoming health conscious. This growing trend is demonstrated in the strong public support for menu labelling. Recent surveys have found that over 90% of Canadians and Ontarians support menu labelling in fast food restaurants; 73% of Canadians believe it is important to require restaurants to display the amount of sodium in the foods they serve; and the majority of Canadians favour having calories (75%) and sodium (71%) on the menu when given a choice of a range of nutrients.

Currently in Canada, many large restaurant chains provide nutrition information, on a voluntary basis, on their websites or via a brochure, poster, tray liner, food wrapping, or napkin. These formats do not consistently make nutrition information readily available to all consumers but only to those motivated to seek out the information. Despite the growing evidence of the effectiveness and feasibility of menu labelling, the restaurant industry in Canada has shown great reluctance to post critical nutrition information on the menu/menu board. As the restaurant industry favours a voluntary approach, the Ontario Public Health Association (OPHA) strongly supports the Provincial Minister of Health's commitment to legislate menu labelling for large chain restaurants and other food service establishments.

Menu labelling is an effective population health intervention

Several U.S. jurisdictions have implemented menu labelling legislation, and have demonstrated that it is both feasible and effective. There is growing evidence that when menu labelling legislation is put in place, nutrient information becomes visible to a majority of restaurant patrons and there is an increased awareness of nutrient content of meals. A smaller proportion of consumers use the information to inform or change their order. A range of studies have shown that 15-30% of people use menu labelling to reduce the amount of calories ordered by about 50 to 100 calories. There is also early evidence that menu labelling has had the unintended positive effect of prompting restaurant chains to create healthier menu options which benefits all consumers. As in other jurisdictions, public education on how to use nutrition information on the menu is required to maximize the impact of menu labelling legislation.

Menu labelling legislation should apply to large chain restaurants

Large chain restaurants use highly standardized menu items and can readily analyze nutrient content, as many already do. They also constitute a large portion of the "eating out" market. Restaurant chains with ten or more locations nationwide represent an appropriate threshold for determining which businesses the legislation would apply to as menu standardization and overall capacity to do menu labelling is very likely ensured. While larger chains appear to be the most readily able to implement menu labelling, independent restaurants and smaller chains have also demonstrated an interest in voluntary programs, and can be enabled to participate with public health support for recipe standardization and nutrient analysis.

OPHA also recommends that the Province consider mandating the provision of calorie and sodium information at the point of purchase in many other large chain establishments that sell "ready-to-eat" food for immediate consumption (e.g., supermarkets, convenience stores, theatres). Large chain grocery stores, for example, are increasingly competing with restaurants by expanding their focus on freshly-made, "home replacement meals".

Calorie and sodium information should be on the menu

OPHA recommends a focus on calories and sodium in recognition of the alarming rates of obesity and hypertension in Ontario. There is strong evidence linking eating out frequently to excess calorie consumption, overweight, and obesity. There is also evidence of high levels of sodium in restaurant foods contributing to Canadians' overconsumption of sodium which has negative health consequences, such as hypertension. The economic burden of health issues related to obesity and hypertension in Ontario ranges in the billions of dollars annually, when including the direct costs to the health care system and indirect costs from premature mortality or disability. Menu labelling can contribute to reductions in obesity and hypertension by creating a more transparent and supportive restaurant environment which allows consumers to more readily

make informed choices. Menu labelling provides clear, unbiased information about a food item; it is not a health claim. As such, OPHA recommends that listing nutrient content, and not warning labels (such as for "high sodium" or "high calorie items"), is the most appropriate way of informing and educating the public. Calorie and sodium values should be displayed clearly and prominently, on the menu, menu board, drive through menu board, or on individual food item tags, preferably in the same typeface, font, and size as the price or other information about the menu item.

Other information that restaurants should provide

The menu/menu board should also include statements about daily calorie and sodium intake requirements to enable consumers to put nutrient amounts in the context of daily needs. In addition, comprehensive nutrition information (calories plus the 13 nutrients on the Nutrition Facts table) should be provided to customers, upon request, in a clear, standardized format, to meet the needs of consumers with particular health or dietary concerns.

Enforce the legislation through food premise safety inspection programs

As has been done successfully in U.S. jurisdictions, OPHA recommends that enforcement be integrated with public health units' existing food safety inspection programs. This would reduce the administrative costs of developing a new infrastructure and would benefit restaurants by not having to work with another administrative structure. It is recommended that the role of public health inspectors would not be to assess the accuracy of nutrient information but to assess whether: a) a reliable and verifiable method of nutritional analysis has been used to arrive at nutrition information; b) the required information is posted on the menu/menu board/food item tags, and in the appropriate format; and c) the full nutrition information is available in the required format, upon request. OPHA recommends that the Province engage public health units specifically in developing the implementation plan and timelines, compliance indicators, enforcement protocols, and the additional budget requirements of public health units to enforce the legislation.

Complementary actions to support menu labelling legislation

OPHA encourages Ontario public health units to consider implementing complementary menu labelling initiatives consistent with emerging best practices, local needs, priorities, and resources. This includes activities to complement and maximize the effectiveness of provincial menu labelling legislation, such as consumer food and nutrition literacy initiatives and public education to increase awareness and use of and demand for menu labelling. Public health units can also consider supporting local foodservice establishments, particularly smaller independent and chain restaurants with fewer resources, to adopt menu labelling voluntarily.

Conclusion

Given that Ontarians are eating out more than ever before, food environments away-from-home are an important setting in which to consider interventions to improve population health in this province. Menu labelling informs people's decision-making in complex food environments, supports information transparency, and makes nutrition information readily and consistently available at the point of sale when people eat out. In the absence of federal action to regulate menu labelling, the OPHA commends the Province for taking steps to mandate posting calorie and other nutrition information at the point of purchase, and recommends the Province strongly consider mandating the posting of sodium values as well. OPHA is prepared to give further input to the Province's efforts on this issue.

References

- ¹ [Healthy Kids Panel. No Time to Wait: The Healthy Kids Strategy. Ottawa: Queen's Printer for Ontario. February 2013.](#)
- ² [Toronto Board of Health. Board Decision on Staff report from the Medical Officer of Health to the Toronto Board of Health: Menu Labelling – Making Key Nutrition Information Readily Available in Restaurants, April 29, 2013.](#)
- ³ [Toronto Public Health. Menu Labelling – Making Key Nutrition Information Readily Available in Restaurants. Staff report from the Medical Officer of Health to the Toronto Board of Health, April 15, 2013.](#)
- ⁴ [Toronto Public Health. What's on the Menu: Making Key Nutrition Information Readily Available in Restaurants. Toronto, Ontario. April 2013.](#)
- ⁵ [Ontario Society of Nutrition Professionals in Public Health Menu Labelling Workgroup. 2013. Serving up Nutrition Information in Ontario Restaurants: A Position Paper. Prepared by Catherine L. Mah.](#)