



July 6, 2022

Sent via email to: nut.labelling-etiquetage@hc-sc.gc.ca

To Whom It May Concern:

In response to Health Canada and the Canadian Food Inspection Agency’s “Consultation on the development of voluntary guidance for providing food information for foods sold to consumers through e-commerce,” the International Food Information Council (IFIC) would like to submit the following comments specific to consumer uptake, comprehension and usage of food information when shopping for food online.

As the voluntary guidance process moves forward, we believe it is important this effort be informed by a science-based, consumer-centered approach to improve the accessibility of food information through e-commerce platforms.

IFIC Overview

IFIC is a United States-based §501(c)(3) non-profit educational organization with a mission to effectively communicate science-based information about health, nutrition, food safety and agriculture. We are staffed by credentialed experts and science communicators across a broad spectrum of food and nutrition subjects, and our work benefits from research and input from top experts in academia, government, and the private sector. IFIC does not represent any company, industry or product, nor do we lobby or serve as an advocacy organization.

One of IFIC’s objectives is to understand public perceptions by conducting consumer research. We have been exploring attitudes and behaviors around food and nutrition for more than three decades, in part through our signature research project, the annual Food and Health Survey. The recently-released [2022 Food and Health Survey](#)¹ – the Survey’s 17th consecutive iteration – is publicly available, as are our [other consumer research initiatives](#).

In our work, we have examined respondents’ purchasing behavior and intent regarding the usage of e-commerce platforms and related food information. While our surveys most often focus on U.S. consumers, our findings nonetheless may prove informative to your regulatory process, given the close ties and similarities between the cultures and markets of Canada and the United States.

Addressing Questions Outlined in Voluntary Guidance Consultation

How frequently do you shop for food online?

The COVID-19 pandemic has drastically changed the way in which people think about and purchase food, including driving growth in e-commerce among food and beverage retailers.² Despite the easing of COVID-19 restrictions and waning concern about contracting COVID-19 during in-person shopping, results from IFIC’s 2022 Food and Health Survey¹ indicate that online grocery shopping only continues to grow in popularity. This year, 25% of respondents reported online grocery shopping at least once a week

¹International Food Information Council. 2022 *Food and Health Survey*. 18 May 2022. <https://foodinsight.org/2022-food-and-health-survey/>

²International Trade Administration, U.S. Department of Commerce. *Impact of COVID Pandemic on eCommerce*. Accessed 6 July 2022. <https://www.trade.gov/impact-covid-pandemic-ecommerce>

(Figure 1), compared to 20% of people who reported doing so in 2021 and 11% in 2020. Younger generations (Gen Z, Millennials and Gen X), those earning over \$75,000 USD per year, men and parents with children under age 18 were more likely to say they shopped online for groceries at least once a week.

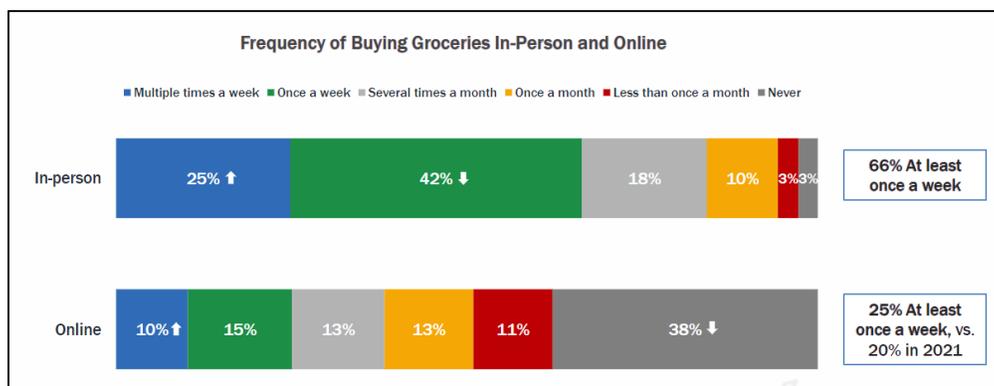


Figure 1. Frequency of buying groceries in-person and online, IFIC 2022 Food and Health Survey.

Additionally, the 2022 Survey¹ found that 13% reported online shopping several times a month and the same percentage were doing so once a month. Only 38% reported never shopping online for groceries, a steep decline from 47% who said so in IFIC’s [2021 Food and Health Survey](#)³ just one year prior.

While part of the population does not currently engage in online grocery shopping, a [survey](#)⁴ fielded by IFIC in late 2021 found that at least a quarter of the population reported interest across a variety of e-commerce services. When asked about the likelihood of trying various food purchasing options in 2022, approximately one in four respondents said they were likely to try meal kit delivery (28%), food subscription boxes (28%), beverage subscription boxes (24%) and online grocery shopping (24%) for the first time.

How would you describe your experience accessing food information when shopping for foods online (for example, list of ingredients and allergens, nutrition facts table)?

IFIC’s 2022 Food and Health Survey¹ examined attentiveness to labels in both online and in-person food shopping environments. Fifty-two percent of respondents who shop for groceries online say that they always or often pay attention to labels, compared with 55% who do so when shopping in-person. Among those who online grocery shop at least monthly, over half say it is very or somewhat easy when shopping online to find information on quantity and price (70%), list of ingredients (70%), nutrition information (67%), size and weight of package (65%), list of ingredients that may cause food allergies or intolerance (60%), hazard and warning labels (58%) and information about safe food handling, preparation, cooking and storage (58%) (Figure 2).

³International Food Information Council. 2021 Food and Health Survey. 19 May 2021. <https://foodinsight.org/2021-food-health-survey/>

⁴ International Food Information Council. COVID-19 and Holidays Survey. 13 December 2021. <https://foodinsight.org/consumer-surveys-covid-19s-impact/>



Figure 2. Ease of finding information when shopping online (of those who shop online monthly), 2022 Food and Health Survey.

While regular online grocery shoppers report minimal difficulty with accessing food information, this is not necessarily the case for the general population. IFIC’s 2021 survey, “[Knowledge, Understanding and Use of Front-of-Package Labeling in Food and Beverage Decisions: Insights from Shoppers in the U.S.](#)”,⁵ found that overall, consumers report greater ease with finding nutritional information when shopping for food in-person. In particular, 79% said it was very or somewhat easy to find nutritional information in person, while 45% said the same about online shopping.

Some of this difficulty stems from the fact that the information may not be available online at all. Researchers from Tufts University (Boston, MA, USA) assessed the availability of required and regulated information in a scan of online food retailers in the U.S.⁶ They found that required information (Nutrition Facts label, ingredient list, common food allergens and percent juice for fruit drinks) was “present, conspicuous and legible” for only 36.5% of products surveyed, ranging from 11.4% for potential allergens to 54.2% for ingredient lists. It was more common for voluntary nutrition-related claims to be displayed (63.5%). Hence, it is clear that regulatory attention to the online availability of nutrition and allergen information has not kept pace with the use of online grocery e-commerce.

The level of ease in accessing specific food information online can also vary by demographic group, particularly age. In recognition of the fact that the age 50+ population is the fastest-growing demographic in the U.S., IFIC partnered with the AARP Foundation in 2018 to conduct a [survey](#)⁷ exploring how members of the Baby Boomer and Silent generations utilize grocery delivery services and the motivators and barriers that prompt or discourage use.

This survey found that 74% of older adults who order groceries online reported taking the time to read the nutritional labels and other food labels on the products they purchase, compared to 59% of the general population. However, when asked whether it is easier to read and understand nutrition and other food labels when grocery shopping in-person versus online, approximately half (51%) said that it was easier to do so in person, while just 8% said it was easier to do online. Additionally, among those who look for specific food and beverage labels, many more people reported that it is much or somewhat harder to

⁵International Food Information Council. *Knowledge, Understanding and Use of Front-of-Package Labeling in Food and Beverage Decisions: Insights from Shoppers in the U.S.* 16 November 2021. <https://foodinsight.org/ific-survey-fop-labeling/>

⁶Pomeranz, J., Cash, S., Springer, M., Del Giudice, L., & Mozaffarian, D. (2022). Opportunities to address the failure of online food retailers to ensure access to required food labelling information in the USA. *Public Health Nutrition*, 25(5), 1375-1383. doi:10.1017/S1368980021004638

⁷International Food Information Council. *Grocery Delivery for Older Americans.* 25 July 2018. <https://foodinsight.org/survey-finds-that-few-older-americans-grocery-shop-online-but-lowering-hurdles-could-sway-many/>

identify whether the food they are ordering meets these criteria when shopping online, compared to when shopping in person (**Figures 3 and 4**).

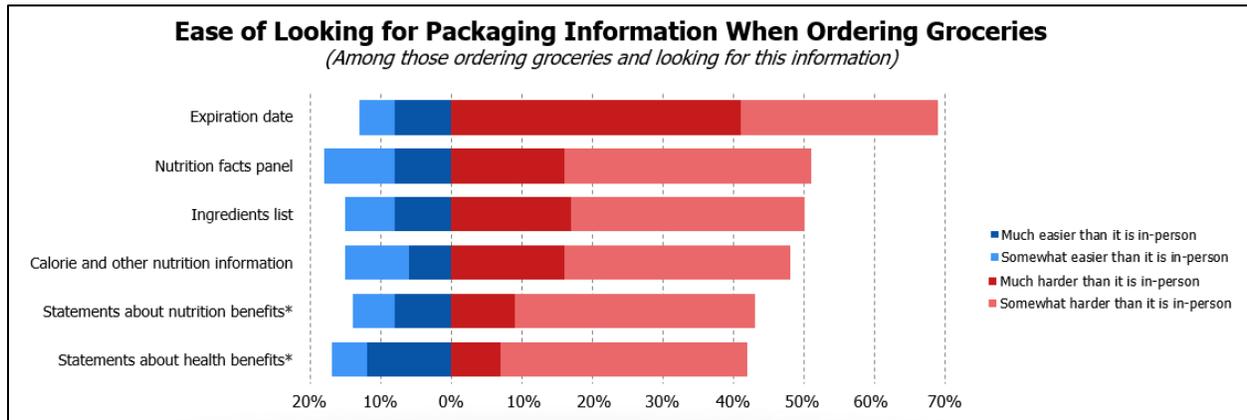


Figure 3. Ease of looking for packaging information when ordering groceries. IFIC Grocery Delivery for Older American Survey.

*Small sample size

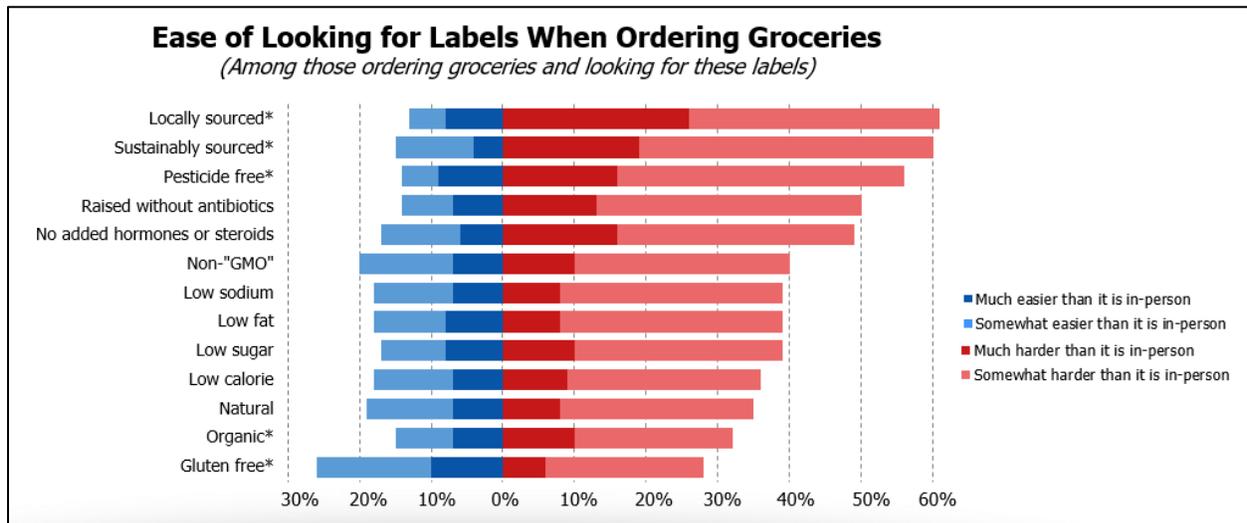


Figure 4. Ease of looking for labels when ordering groceries. IFIC Grocery Delivery for Older American Survey.

*Small sample size

All told, 71% of older adults said that not being able to read nutrition or other food labels was a barrier to ordering groceries online. It is clear that in order to ensure equitable access to food-related e-commerce, the needs and challenges of older adults seeking food information online should be considered.

What do you think could improve your access to food information when shopping for foods online?

Integrating an understanding of the food labels that are most used and sought-after by consumers may inform the specific types of information that should become more easily accessible. IFIC's 2018 Food and Health Survey⁸ found that over half (52%) consult the Nutrition Facts label and the ingredients list always or often when deciding whether to purchase a food or beverage; 39% said the same about nutrient content or health claims. IFIC's FOP labeling survey⁵ found that the most frequently considered FOP labels or claims were nutrition facts highlights (45% consider always/often), ingredient-specific labels that identify

⁸International Food Information Council. 2018 Food and Health Survey. 13 May 2018. <https://foodinsight.org/2018-food-and-health-survey/>

ingredients that are included/excluded (41%), third-party certifications (34%) and nutrient content claims (32%). Nearly one in four (23%) always or often consider allergen or food intolerance declaration labels on FOP.

The 2022 Food and Health Survey¹ specifically explored the label preferences of online grocery shoppers. This population said they regularly buy products online labeled as “natural” (38% said this), “clean ingredients” (29%), “organic” (29%), “no added hormones or steroids” (24%), “locally-sourced” (23%) and “small carbon footprint/carbon neutral” (22%). Compared to 2021, more consumers this year say they are buying products online labeled as “clean ingredients,” “no added hormones or steroids” and “small carbon footprint/carbon neutral.”

The most commonly sought-after labels among the general population were “natural” (39% said this), “clean ingredients” (27%), “raised without antibiotics” (25%), “no added hormones or steroids” (25%), “locally-sourced” (25%) and “organic” (25%). While similarities persist among the label preferences of these two groups of shoppers, the differences possibly demonstrate a distinction in priorities for those who shop in person compared with the demographics most likely to shop for food online (e.g., younger people, those with higher incomes, men and parents with children under age 18).

The accessibility of specific food information also influences whether older adults would increase their participation in grocery delivery. In IFIC’s 2018 survey of older adults,⁶ over half (57%) said that the ability to view nutrition labels and other food labels before purchasing the product would encourage them, at least to some extent, to more frequently shop for groceries to be delivered. Three in ten (30%) said they would be encouraged to a similar extent if specialized services that recommended foods based on their age and nutrition needs were available.

Final Recommendations for Action

E-commerce is revolutionizing consumer food purchases, not only in how they obtain food but also which foods they choose. It is vital that policymakers be aware of the disparate needs of consumers as they consider changes that are intended to modernize purchasing options. These changes should also be the subject of intensive consumer insights research, public outreach and education so that we can have a food system that meets the demands of the future — for the benefit of every individual.

Thank you for the opportunity to provide our comments on this topic of critical importance.

Sincerely,



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