

**APPENDIX C**

**CLAIM WORDING REQUIREMENTS: Comparison of elements identified as required in July 1999 consultation, & elements required in U.S. Health Claims**

<b>DIET-DISEASE RELATIONSHIPS FOR HEALTH CLAIMS</b>											
<b>CLAIM WORDING REQUIREMENTS</b>		<b>1. calcium &amp; osteoporosis</b>	<b>2. dietary fat &amp; cancer</b>	<b>3. sodium &amp; high blood pressure</b>	<b>4. sat fat/chol &amp; CHD<sup>1</sup></b>	<b>5. grain/fruit/veg &amp; cancer</b>	<b>6. fruit/veg/ grain (sol fibre) &amp; CHD<sup>1</sup></b>	<b>7. fruit/veg &amp; cancer</b>	<b>8. folate &amp; neural tube defects</b>	<b>9. sugar alcohols &amp; dental caries</b>	<b>10. sol fibre (oats/psyll) &amp; CHD<sup>1</sup></b>
<b>a) State specific terms to be used to represent the disease</b>	<b>Consultation<sup>2</sup></b>	<b>Required</b> Use specific term "osteoporosis"	<b>(claim element not assessed at consultation)</b>	<b>Required:</b> Use specific term "high blood pressure"		<b>Required:</b> Use specific term "some cancers"	<b>Required</b>	<b>Required:</b> use specific term "some types of cancers"	<b>(claim element not assessed at consultation)</b>	<b>Required:</b> Use specific term "tooth decay" (English), and "carie" (French)	<b>Required:</b> Use specific term "coronary heart disease" "cholesterol lowering"
	<b>U.S. Claims<sup>3</sup></b>		<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>
<b>b) State specific term to be used to represent the nutrient or component or to characterize a food</b>	<b>Consultation<sup>2</sup></b>		<b>(claim element not assessed at consultation)</b>	<b>Required:</b> Use specific term "sodium"	"delete cholesterol" from the claim and put in type of fat"	<b>Required:</b> Use specific term "dietary fibre or total dietary fibre"	<b>Required</b>	<b>Required:</b> "not just vitamins A&C that decreases risk"	<b>(claim element not assessed at consultation)</b>		<b>Required:</b> Use specific term "soluble fibre"
	<b>U.S. Claims<sup>3</sup></b>		<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>	<b>Required</b>
<b>c) State primary target population (if other than the general population)</b>	<b>Consultation<sup>2</sup></b>	"calcium is needed at all life stages"	<b>(claim element not assessed at consultation)</b>						<b>(claim element not assessed at consultation )</b>		
	<b>U.S. Claims<sup>3</sup></b>	<b>Required</b>							<b>Required</b>		
<b>d) Provide Physician's statement concerning target group</b>	<b>Consultation<sup>2</sup></b>				"beyond the scope of health claims"		"would need to consult your doctor to determine your cholesterol level"		<b>(claim element not assessed at consultation )</b>		
	<b>U.S. Claims<sup>3</sup></b>			<b>Required</b>	<b>Required</b>		<b>Required</b>				

1. Coronary heart disease    2. Response from Canadian July 1999 consultation

3. Required in U.S. health claims authorized under the NLEA.

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<b>e) Use wording at a general not specific level</b>	<b>Consultation<sup>2</sup></b>	“exercise is proven and there are other risk factors”	(claim element not assessed at consultation)			Required		“fibre, antioxidants”	(claim element not assessed at consultation )		
	<b>U.S. Claims<sup>3</sup></b>		Required			Required		Required			
<b>f)List additional factors necessary to reduce risk</b>	<b>Consultation<sup>2</sup></b>	“exercise is proven and there are other risk factors”	(claim element not assessed at consultation)					“healthy lifestyle”	(claim element not assessed at consultation )		<b>Required:</b> “regular exercise and lower fat intake”
	<b>U.S. Claims<sup>3</sup></b>	<b>Required</b>					<b>Required</b>		<b>Required</b>		<b>Required</b>
<b>g) State mechanism</b>	<b>Consultation<sup>2</sup></b>	“do via education”	(claim element not assessed at consultation)						(claim element not assessed at consultation)	<b>Required</b>	<b>Required</b>
	<b>U.S. Claims<sup>3</sup></b>	<b>Required</b>								<b>Required</b>	
<b>h) provide statement about intake over a certain level</b>	<b>Consultation<sup>2</sup></b>		(claim element not assessed at consultation)						(claim element not assessed at consultation )		“regular exercise and lower fat intake”
	<b>U.S. Claims<sup>3</sup></b>	<b>Required</b>							<b>Required</b>		
<b>i) List risk factors for the disease</b>	<b>Consultation<sup>2</sup></b>	“is misleading”	(claim element not assessed at consultation)						(claim elements not assessed at consultation )	“too complex therefore need education program”	
	<b>U.S. Claims<sup>3</sup></b>	<b>Required</b>								<b>Required</b>	

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j) Allow for wording on small packages	Consultation <sup>2</sup>		(claim element not assessed at consultation)			"need to investigate ways to do this"	"need options for fruit & vegetables "use split claims"		(claim element not assessed at consultation )	Required	
	U.S. Claims <sup>3</sup>									Required	
k) State eligible source of nutrient or substance	Consultation <sup>2</sup>		(claim element not assessed at consultation)						(claim element not assessed at consultation)		"instead put in ingredient list"
	U.S. Claims <sup>3</sup>										Required
l) state daily dietary intake necessary to reduce risk; contribution from one serving	Consultation <sup>2</sup>		(claim element not assessed at consultation)					"Use Food Guide numbers"	(claim element not assessed at consultation)		
	U.S. Claims <sup>3</sup>										Required
m) Provide statement about how to consume the substance	Consultation <sup>2</sup>		(claim element not assessed at consultation)						(claim element not assessed at consultation)		"advice to consume water depends on the water content of the product"
	U.S. Claims <sup>3</sup>										Required

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