



Health
Canada

Santé
Canada

*Your health and
safety... our priority.*

*Votre santé et votre
sécurité... notre priorité.*

Preliminary Guidance for Industry on the Labelling of Caffeine Content in Prepackaged Foods

Bureau of Chemical Safety
Food Directorate
Health Products and Food Branch

A WHO Collaborating Centre for
Food Contamination Monitoring



March 2010

Canada 

Preliminary Guidance for Industry on the Labelling of Caffeine Content in Prepackaged Foods

Purpose

This document provides guidance to food manufacturers on how to improve labelling of caffeine present in prepackaged beverages using a voluntary approach.

Regulatory Background

Provisions currently exist in the *Food and Drug Regulations* for the use of caffeine and caffeine citrate as food additives in cola type beverages at a maximum level of use of 200 ppm in the finished product. In addition, an Interim Marketing Authorization (IMA) is being issued to permit the immediate use of caffeine and caffeine citrate in beverages that fall under the food category described as “non-alcoholic carbonated water-based flavoured sweetened beverages”. This category of beverages is commonly referred to as carbonated “soft drinks”. Under the IMA, the maximum permitted level of use of caffeine and caffeine citrate (calculated as caffeine), singly or in combination, will be 150 ppm in the finished product. The IMA will become effective upon the date of publication in *Canada Gazette*, Part I. The permitted maximum level of caffeine and caffeine citrate in cola type beverages will remain at 200 ppm as stipulated in Division 16 of the Regulations.

It is a regulatory requirement that the label of most prepackaged foods must declare a list of ingredients, including food additives such as caffeine, in descending order of proportion. However, there is no regulatory provision for mandatory quantitative labelling of caffeine, (e.g., milligrams caffeine per stated serving size). As for “natural caffeine”, there are a number of food ingredients that naturally contain caffeine. These ingredients must appear in food ingredient lists. However, as is the case for “food additive caffeine”, there is no requirement to identify the quantitative amount of caffeine in composite foods containing ingredients that are natural sources of caffeine. While coffee or chocolate are broadly recognized as caffeine sources, some ingredients (e.g., guarana, yerba maté) are likely less recognized as caffeine sources. For these natural sources of caffeine, there is no regulatory provision requiring that a food label identify the presence of caffeine nor state the amount of caffeine present in the food.

Objective

In 2002, Health Canada established recommendations on maximum caffeine intakes for adults in general and certain specific population sub-groups. These recommendations are published in the Health Canada publication “It’s Your Health – Caffeine”:

<http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/food-aliment/caffeine-eng.php>

The Health Canada Fact Sheet “Caffeine and Your Health” also contains these recommendations as well as information on the amounts of caffeine typically found in various foods:

<http://www.hc-sc.gc.ca/fn-an/securit/facts-faits/caffeine-eng.php>

Quantitative labelling of caffeine in foods would provide consumers with additional information that they can readily use to more accurately determine daily caffeine intake. Therefore, Health Canada is issuing this guidance document to urge food manufacturers to quantitatively label caffeine when present in certain prepackaged foods, such as beverages.

Labelling Guidelines

To assist food manufacturers and to ensure that there is consistency among manufacturers when voluntarily labelling the caffeine content of foods, Health Canada is providing the following general labelling guidelines to industry:

- When the food additive caffeine is added to a beverage, the caffeine content of that beverage should be expressed on the product label in milligrams (mg) of caffeine per stated serving size.
- When the food additive caffeine is added to a beverage that also has added to it an ingredient that naturally contains caffeine, all sources of caffeine should be taken into account in order to express total caffeine content on the product label in milligrams (mg) of caffeine per stated serving size.
- If an ingredient, that is a relatively unknown source of caffeine (e.g. guarana, yerba maté), is added to a food, the total caffeine content of that food should be indicated on the product label in milligrams (mg) of caffeine per stated serving size.
- The product's caffeine content statement should be placed outside and directly beneath the nutrition facts panel and should read as follows:
Caffeine Content: __mg per "stated serving size"
- Caffeinated versions of carbonated "soft drinks" that have not previously been permitted to contain the food additive caffeine and which consumers would not expect to contain caffeine, should bear a statement "Contains Caffeine" on the label's principal display panel if the intention is to market and present the product under the same brand name. The product should carry the statement for a sufficient period of time to alert consumers to the fact that the product is now caffeinated.
- As always, manufacturers should ensure that all labelling information is presented in a clearly visible and legible manner and is compliant with all Health Canada and Canadian Food Inspection Agency labelling requirements.
- The above guidelines do not apply to foods / ingredients that are well known sources of caffeine (e.g. coffee, tea and chocolate).

The Food Directorate is open to receiving comments and feedback from both industry and consumers on these preliminary guidelines. Comments may be submitted in writing, either electronically or by regular mail. If you are submitting your comments electronically, please use the word "Caffeine Labelling" in the subject box of your e-mail.

Mailing address:

Health Canada

Bureau of Chemical Safety

Tunney's Pasture, Postal Locator: 2203B

251 Sir Frederick Banting Driveway

Ottawa, Ontario K1A 0L2

E-mail address:

bc-s-bipc@hc-sc.gc.ca