



HOUSE OF COMMONS  
CHAMBRE DES COMMUNES  
CANADA

August 10, 2018

The Honourable Ginette Petitpas Taylor, P.C., M.P.  
Minister of Health  
Health Canada  
70 Columbine Driveway  
Ottawa, ON K1A 0K9

Dear Minister Petitpas Taylor,

As you are aware, on 9 November 2017, the House of Commons Standing Committee on Health (the committee) agreed to hold two meetings on *Eating Well with Canada's Food Guide*. On 30 November 2017, the committee agreed to additional meetings on this topic. At the first meeting on 5 December 2017, the committee heard from Health Canada, the Canadian Paediatric Society, and Dietitians of Canada. At the second meeting on 12 December 2017, the committee heard from the Heart and Stroke Foundation of Canada, Diabetes Canada, and Dr. Benoît Lamarche, Chair in Nutrition, Université Laval.

The committee was scheduled to hold two more meetings in June 2018, but unfortunately those meetings were cancelled because of votes in the House of Commons. Scheduled to appear at those meetings were Dr. Malek Batal, Associate Professor, Faculty of Medicine, Department of Nutrition, Université de Montréal; Chicken Farmers of Canada; the Coalition for Healthy School Food; the Fisheries Council of Canada; Food and Consumer Products of Canada; Health Canada (to update the committee on the Food Guide consultation); Dairy Farmers of Canada and Egg Farmers of Canada. Witnesses that were scheduled to appear for the cancelled meetings were asked to submit briefs to the committee, and the committee also received a number of briefs from other stakeholders.

Some of the stakeholders who provided testimony or briefs to the committee supported Health Canada's Evidence Review Cycle for Dietary Guidance, the revision process of Canada's Food Guide and the proposed Guiding Principles and Recommendations, while others raised concerns in all respects. We appreciate the time taken and effort made by witnesses and other stakeholders who provided valuable submissions to the committee, and are highlighting some of the key points that were raised for your consideration.

### **The Evidence Review Cycle for Dietary Guidance**

In its submission, the Canadian Medical Association noted that "Canadians must have confidence that their health and wellness is the primary focus of an evidence-based revision process," and the Coalition for Healthy School Food stated in its brief that "Health Canada is showing a strong commitment to using evidence to inform its decision making." However, a number of submissions questioned the

interpretation of the evidence by Health Canada, and suggested that some of the data contained in the evidence review is not up-to-date. For example, Dairy Farmers of Canada stated that the evidence review highlights that “milk products are underconsumed and are associated with improved bone health and reduced risk of several diseases such as hypertension and stroke,” and that the evidence does not support emphasizing plant proteins over other forms of protein. Food and Consumer Products of Canada noted that the data on food nutrient intakes is from the 2004 Canadian Community Health Survey (CCHS), and that it should be reviewed based on 2015 CCHS data. In addition, the Meat Council of Canada suggested that the focus on plant proteins comes from a 2011 review done by the World Cancer Research Fund, which has since been updated.

### **The Consultation Process on Canada’s Food Guide**

The Coalition for Healthy School Food was very positive about the consultation process, describing the level of transparency as “excellent,” noting that consultation was extensive, that there is a strong commitment to evidence, and that the process was not “unduly influenced by food industry stakeholders, which has been a major criticism of previous Food Guides.” Dr. Malek Batal from the Université de Montréal also supported limiting the food industry’s participation, noting that “the industry possesses many other opportunities than the food guide to influence what people consume daily.”

The Ordre professionnel des diététistes, however, questioned the validity of the anonymous online questionnaire for a number of reasons, including that it potentially allowed for agri-food industry participants to respond several times, and that all opinions, regardless of whether an individual or an organization was responding, were given equal weight.

In their submissions to the committee, a number of industry participants raised concerns about the consultation process. For example, Chicken Farmers of Canada expressed the concern that the respondents to the initial consultation were not representative of the Canadian population. Food and Consumer Products of Canada questioned the scientific basis on which the decision was made to exclude the food industry, and also suggested that the online questions demonstrated bias toward processed food. The Meat Council of Canada stated that the food industry needed to be involved in Food Guide consultations.

### **Health Canada’s Proposed Guiding Principles and Recommendations and Considerations for Dietary Guidance**

#### **Guiding Principle 1: A variety of nutritious foods and beverages are the foundation for healthy eating**

##### **Health Canada recommends:**

- **regular intake of vegetables, fruit, whole grains and protein-rich foods, especially plant-based sources of protein** (a footnote states that “Protein-rich foods include: legumes (such as beans), nuts and seeds, soy products (including fortified soy beverage), eggs, fish and other seafood, poultry, lean red meats (including game meats such as moose, deer and caribou), lower fat milk and yogurt, cheeses lower in sodium and fat. Nutritious foods that contain fat such as homogenized (3.25% M.F.) milk should not be restricted for young children.”)

A number of submissions raised concerns about what was perceived to be a preference for plant-based sources of protein over other sources of protein (including Egg Farmers of Canada, Chicken Farmers of Canada, Turkey Farmers of Canada, Dairy Farmers of Canada, National Cattle Feeders' Association, and Canadian Meat Council). Dairy Farmers of Canada stated that the evidence does not support prioritizing plant-based sources of protein, and some submissions, including the National Cattle Feeders' Association brief, noted that there is an increased caloric intake associated with plant-based instead of animal proteins, and that there should be separate categories for plant and animal protein. The Canadian Meat Council stated that "Putting a focus on one particular food, as is the case with focusing on plant proteins, without providing further information on proportions, nutrient values, protein quality, and other factors is misleading and confusing to consumers."

Sangita Sharma from the University of Alberta proposed that the recommendation should say protein and dairy products rather than protein-rich foods, and that there should be no emphasis on plant proteins. The Fisheries Council of Canada recommended a greater emphasis on fish as a protein source.

The Ordre professionnel des diététistes supported the reference to plant proteins in the recommendation, while the Dietitians of Canada, in its appearance before the committee, noted that more clarity is needed with respect to the meaning of the part of the recommendation, "especially plant-based sources of protein."

- **inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat**

The National Cattle Feeders' Association recommended a whole-food approach rather than focusing on saturated fat. The Dietitians of Canada recommended greater clarity about what replacing saturated fat by polyunsaturated fat means, asking "what does it look like in terms of food choices?"

- **regular intake of water**

Diabetes Canada and the Heart and Stroke Foundation of Canada, in their appearances before the committee, emphasized the need to improve access to safe drinking water. The Ordre professionnel des diététistes recommended using a stronger word than "regular" in relation to water intake, stating "referring to water as the "beverage of choice," as is done in the general explanation of Guiding Principle #1, seems more appropriate." They also suggested including a warning about disposable water bottles and their environmental impact.

### **Guiding Principle 2: Processed or prepared foods and beverages high in sodium, sugars or saturated fat undermine healthy eating**

#### **Health Canada recommends:**

- **limited intake of processed or prepared foods high in sodium, sugars or saturated fat**

The need to define "processed" was highlighted by some witnesses and briefs. The Ordre professionnel des diététistes stated that there needs to be an explanation of what "processed" includes and excludes (for example, it should not include flour, oil or frozen fruit.) The National Cattle Feeders' Association proposed distinguishing between highly processed and lightly processed foods.

When he appeared before the committee, Dr. Jeff Critch from the Canadian Paediatric Society agreed that there is a need to emphasize the negative health impacts of processed foods high in sugar, salt, and saturated fat. A number of witnesses and briefs, however, suggested that a focus on individual nutrients is problematic. Egg Farmers of Canada recommended that instead of nutrients, there should be a focus on “the entire nutritional package.” Dr. Benoît Lamarche, Chair in Nutrition, Université Laval, suggested that focusing on nutrients may be confusing, and that instead the emphasis should be on a whole food approach. Dr. Malek Batal from the Université de Montréal emphasized the importance of sharing meals and mindful eating rather than focusing on nutrients, and the Ordre professionnel des diététistes stated that “it is more relevant to develop the ability to plan, procure and prepare meals than to count the various nutrients that will be absorbed.”

- **avoiding processed or prepared beverages high in sugars**

Many witnesses and briefs referred to the sugar content of fruit juice. In its appearance before the committee, the Heart and Stroke Foundation of Canada stated that “sugary drinks of any sort, including 100% fruit juice, should not be included in dietary recommendations to Canadians. They should not be considered alternatives to fruit.” In its brief, the Canadian Medical Association states that “there should be a maximum amount of juice recommended for children.”

In its submission, the Juice Council of Canada maintained that excluding 100% juice is not supported by the evidence, and will have a number of unintended consequences. Food and Consumer Products of Canada states that “Health Canada’s 2015 *Evidence Review for Dietary Guidance Technical Report* considered 100% Fruit and Vegetable Juice to be ‘in line’ with Canada’s Food Guide recommendations.” The Breakfast Club of Canada notes that 100% juice is a significant source of Vitamin C and potassium, and that “the major changes being made to the classification of 100% fruit juices in Canada could affect the diversity of products provided to the schools we support.” Dr. Benoît Lamarche from l’Université Laval said that there is no evidence that zero juice is better than a little bit of juice.

The Ordre professionnel des diététistes indicated that Health Canada should clearly explain its reasoning for excluding fruit juice from its dietary guidance, otherwise it will be difficult for Canadians to accept the change.

**Guiding Principle 3: Knowledge and skills are needed to navigate the complex food environment and support healthy eating**

**Health Canada recommends:**

- **selecting nutritious foods when shopping or eating out**
- **planning and preparing healthy meals and snacks**
- **sharing meals with family and friends whenever possible**

Many submissions supported this Guiding Principle, but made suggestions for strengthening it. Turkey Farmers of Canada noted the need for more education on food and nutrition, and the Heart and Stroke Foundation of Canada emphasized the need for support and education relating to planning and preparing healthy meals and snacks.

The Fisheries Council of Canada recommended that “Health Canada fully consider how to best reach consumers in the modern day, and how to provide them with relevant information, which may extend beyond purely the nutritional value, and the Food Guide itself.”

With respect to food preparation, Dr. Malek Batal from the Université de Montréal explained that emphasizing home food preparation will need to include “a discussion about the roles of women and men in food preparation, so as not to add an extra burden to women.”

### **Guiding Principles and Recommendations: Considerations**

#### **•determinants of health**

The issue of food insecurity in Canada was raised in briefs and by witnesses who appeared before the committee. The Canadian Medical Association stated that “The Food Guide must go hand in hand with efforts to increase access to affordable, healthy food,” and the Coalition for Healthy School Food states that “a food guide alone cannot change people’s food choices without other supports to promote healthy food environments and improve food security.” Dr. Malek Batal from the Université de Montréal referred to the need to take into account issues of access to healthy food by different groups, including issues of food insecurity on First Nations reserves.

Diabetes Canada explained that all levels of government should work together to reduce food insecurity in Canada.

#### **•cultural diversity**

Sangita Sharma from the University of Alberta noted that “meat and dairy products are the centerpiece of many family food traditions,” and that “animal products are a critical component of Indigenous land-based food gathering.” Dr. Malek Batal from the Université de Montréal explained that revisions need to reflect the food habits of a diverse Canadian population, and pointed to the example of children who eat traditional food in hiding at school because of the stigma associated with the food. The Canadian Medical Association stated that “The current food groups do not always take into account an understanding of traditional foods and cultural eating practices. These are intrinsically linked to identity and culture and contribute to overall health. Advice needs to be tailored to different ages and cultural groups.”

#### **•environment**

The Canadian Paediatric Society and Dr. Malek Batal from the Université de Montréal agreed that sustainable development and environmental protection should be part of considerations relating to the Food Guide revision process. Some industry stakeholders disagreed, noting that by including environmental factors, it “blurs the Health Canada focus on nutrition” (Turkey Farmers of Canada), and that “generalized statements about environmental sustainability” should be avoided (Egg Farmers of Canada).

### **Other Issues Raised by Witnesses or in Briefs**

A number of other concerns were raised by witnesses or in briefs that do not necessarily fall within the Guiding Principles, Recommendations and Considerations put forward by Health Canada. In particular, it was noted that it may be inappropriate to apply the Guiding Principles in some circumstances. For

example, the Canadian Nutrition Society explained that the current version of Canada's Food Guide targets a generally healthy population, and the organization is concerned about the guide's use in health care institutions where individuals may have different nutrition needs. It recommended that the following statement be included as part of dietary guidance documents that are put forward by Health Canada "CFG [Canada's Food Guide] is not designed to be the sole source for menu planning for vulnerable populations in health care institutions." The Ordre professionnel des diététistes recommended including a statement that Canada's Food Guide is not a substitute for a personalized nutritional treatment plan for individuals with chronic diseases, and the Coalition for Healthy School Food pointed out that dietary guidance documents need to be clear in their advice relating to young and older school-aged children.

Other concerns raised by witnesses or in briefs were related to:

- Front-of-Package labelling;
- the perceived need for federal funding for a healthy school food program;
- including facts about alcohol as part of dietary guidance documents (Dietitians of Canada);
- including advice for increasing fruit and vegetable intake as part of dietary guidance documents (Canadian Paediatric Society); and
- highlighting the need for adequate fibre intake as part of dietary guidance documents (Canadian Paediatric Society).

For your convenience, a hyperlinked list of the briefs that were submitted to the committee is attached to this letter.

The committee hopes that this summary assists you and your department as you continue to review Canada's Food Guide.

Sincerely,



Mr. Bill Casey, Member of Parliament  
Chair of the House of Commons Standing Committee on Health

# LIST OF BRIEFS

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## Organizations and Individuals

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[Batal, Malek](#)

[Canadian Juice Council](#)

[Canadian Meat Council](#)

[Canadian Medical Association](#)

[Centre for Health Science and Law](#)

[Chicken Farmers of Canada](#)

[Coalition for Healthy School Food](#)

[Dairy Farmers of Canada \(December 2017\)](#)

[Dairy Farmers of Canada \(June 2018\)](#)

[Dairy Processors Association of Canada](#)

[Egg Farmers of Canada](#)

[Fisheries Council of Canada](#)

[Food & Consumer Products of Canada](#)

[National Cattle Feeders' Association](#)

[Ordre professionnel des diététistes du Québec](#)

[Sharma, Sangita](#)

[Turkey Farmers of Canada](#)