

## **Canada's Food Guide - CMC Responses (FINAL – 2017AU12)**

### **Canada's Food Guide Consultation: Professionals and Organisations**

Health Canada is revising Canada's Food Guide to strengthen its recommendations for healthy eating.

In the fall of 2016, we asked Canadians what they need and expect from a revised Canada's Food Guide. The What We Heard Report summarizes the almost 20,000 responses we received. We've used this input to help develop the recommendations for healthy eating, and to identify ways to improve how we communicate to better meet the needs of different audiences.

Now we need your input on the new healthy eating recommendations.

**Once we hear from you through this online consultation, your input will help us to finalize our recommendations and develop them into consumer messages, tools, and resources. A new suite of Canada's Food Guide resources will be rolled out beginning in early 2018.**

Thank you for taking part!

This is the print-version of the eWorkbook component of the consultation. For further information, to submit your responses directly online and to participate in the online discussion forum, please visit <http://www.foodguideconsultation.ca>.

### **Profile**

Please tell us about yourself. This helps Health Canada to know if our consultation has met our goal of being broad, transparent and inclusive.

We will not share your details or use them for any other purpose than to give you updates on this consultation process. The data we gather for analyzing feedback will never identify individual people.

#### **1. Please choose what best describes you. Are you giving us your feedback:**

- On behalf of an organization?
- As someone who cares about health eating recommendations for you, your family, or friends?
- As a professional who uses healthy eating recommendations in your work?
- I prefer not to disclose.

#### **2. Province/Territory**

- Alberta
- British Columbia
- Manitoba
- New Brunswick
- Newfoundland and Labrador
- Northwest Territories
- Nova Scotia
- Nunavut
- Ontario
- Prince Edward Island

- . Quebec
- . Saskatchewan
- . Yukon
- . Prefer not to disclose

**3. Select the sector in which you or your organisation works:**

- . Government
- . Food and beverage industry (for example, agriculture, food producers, food retailers, food distributors, hospitality)
- . Schools and daycares
- . Hospitals and other health care facilities
- . Research in an academic setting
- . Private practice or consulting
- . Health and nutrition organizations
- . Sports, athletics, and fitness
- . Other
- Food processing industry association**
- . Prefer not to disclose

**4. What is your or your organization’s main interest in healthy eating recommendations?**

- . For program design
- . To develop policies and guidelines
- . For tool and resource development
- . For food product development or marketing**
- . For in-service training and training trainers
- . For individual nutritional counselling and assessment
- . For group education (for example, in schools or the community)
- . For assessment of eating habits in a research or monitoring setting
- . For general health promotion
- . Other \_\_\_\_\_
- . Prefer not to disclose

**5. How often you or your organization work with one or more of the following client groups?**

	<u>Older adults</u>	<u>Children or youth</u>	<u>Indigenous peoples</u>	<u>Low-income earners</u>
Always				
<b>Often</b>	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
Sometimes				
Rarely				
Never				
Prefer not to disclose				

## **Summary**

Based on the available evidence, Health Canada has translated the science on food and health into evidence-informed Guiding Principles and Recommendations for application in the Canadian context (Table 1).

The Guiding Principles and Recommendations provide a foundation for healthy eating that promotes health and reduces the risk of nutrition-related chronic disease. Health Canada recognizes that Canadians may occasionally have foods and beverages outside these recommendations; less healthy choices high in sodium, sugars, or saturated fat will be consumed at times. What matters most is what people eat on a regular basis.

Individuals with special dietary requirements may need additional guidance from a health care professional.

### **Table 1: Proposed Guiding Principles, Recommendations and Considerations**

#### **Guiding Principles and Recommendations**

##### **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
- . Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat
- . Regular intake of water

##### **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
- . Avoidance of processed or prepared beverages high in sugars

##### **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

##### **Considerations:**

- . Determinants of health
- . Cultural diversity
- . Environment

## Guiding Principle 1

Based on the available evidence, Health Canada is proposing the following Guiding principle and Recommendations to focus on the regular intake of nutritious foods as the foundation for healthy eating.

### 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
- . Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat
- . Regular intake of water

\*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.

What this means for Canadians

The majority of Canadians don't eat enough vegetables, fruits and whole grains and many drink beverages high in sugars. This means that most Canadians will need to make different choices to meet these recommendations.

What is needed is a shift towards a high proportion of plant-based foods, **without necessarily excluding animal foods altogether**. Animal foods such as eggs, fish and other seafood, **poultry, lean red meats such game meats**, lower fat milk and yogurt, as well as cheeses lower in sodium and fat are nutritious 'everyday' foods. **Some of these protein-rich foods can be high in sodium (e.g., salted nuts), sugars (e.g., sweetened yogurt) or saturated fat (e.g., some meats and many cheeses) and should be limited.** They can be identified using the % Daily Value (DV) on the Nutrition Facts table: 5% or less of the %DV is "a little" and 15% or more of the %DV is 'a lot' of sodium, sugars or saturated fat.

A shift towards more plant-based foods can help Canadians:

- . eat more fibre-rich foods;
- . **eat less red meat (beef, pork, lamb and goat);** and
- . replace foods that contain mostly saturated fat (e.g., cream, high fat cheeses and butter) with foods that contain mostly unsaturated fat (e.g., nuts, seeds, and avocado).

To help meet these recommendations, Canadians can choose nutritious foods and beverages, including:

- . foods and beverages that require little or no preparation such as fresh, frozen and canned vegetables and fruit, canned legumes or fish, tofu, plain milk or fortified plant-based beverages;
- . foods and beverages that are pre-packaged for convenience (such as pre-washed salad greens, pre-cut fruit) or to increase shelf-life (such as powdered milk);

- . foods like nuts, seeds, fatty fish, avocado, and vegetable oils instead of foods like high fat cheeses and cream; and
- . foods obtained through gardening, hunting, trapping, fishing and harvesting.

Plain water is the beverage of choice to help reduce sugars intake and reduce the frequency at which teeth are exposed to sugars.

**Do you agree with the following statements about this Guiding Principle?**

	<u>Yes</u>	<u>No</u>	<u>Don't know</u>
It is relevant to my work and/or my organization's work.	X		
It is clear.		X	
It provides enough information.		X	

## **Recommendation 1: Regular intake of vegetables, fruit, whole grains, and protein-rich foods\* – especially plant-based sources of protein**

\*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.

### **Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

### **What do you like about this recommendation?**

The recommendation recognizes the contribution of protein rich foods such as poultry, lean red meats (including game meats such as moose, deer and caribou) to a balanced diet.

### **What do you dislike about this recommendation?**

The recommendation is too “simple”:

It does not provide sufficient information (e.g. in regard to how foods are prepared/consumed - breaded/fried/sauced/skin on white meat or dark meat poultry vs broiled/grilled/roasted red meats or skin off chicken). Similar consideration should also apply in regard to how the other foods listed are prepared (e.g. fruit and vegetables in sauces).

As currently written it appears that poultry regardless of how prepared should be the choice.

At a minimum, the wording should be modified as follows “... lean poultry, lean red meats ...”.

The recommendation does not provide information in regard to actual protein values, portion sizes and calories (e.g. one would need to consume almost 270 more calories from chick peas to get the same amount of protein - 22 grams - provided in a 75 gram portion of pork which provides 138 calories).

Many of the foods listed as “protein-rich”, particularly nuts, seeds and legumes, do not meet the criteria for protein claims (e.g., excellent, high, source, contains). Therefore, these should not be referred to as “protein-rich” or even “protein foods”.

There is a lack of consistency in the definition of protein-rich foods between the Food Guide and Marketing to Children discussion documents.

Consumers shop for food; not nutrients. Mixing nutrient based recommendations (e.g. protein group with food specific e.g. vegetables and fruit) is confusing.

Creating a protein group does a disservice to milk and milk products and meat and alternatives.

Conceivably Canadians could fall short on key nutrients found distinctly in these food groups, for example, calcium and iron respectively.

The recommendation does not address nutrient density, portion sizes, calories, protein values or preparation methods which play an important role in a balanced diet.

Nutritional guidance should focus on an individual's total diet and life style (e.g. focus on moderation, variety, calorie balance and activity/exercise rather than focusing on individual nutrients or foods to limit).

The recommendation does not recognize the importance of other nutrients provided by nutrient dense foods and their contribution to a balanced diet.

Meat and poultry are an important component of a healthy human diet. They provide essential amino acids, minerals such as iron, vitamins, and other dietary requirements. Animal proteins are the only single sources of all the essential amino acids. Animal proteins are very difficult to replace on a macronutrient quality basis. In addition to high quality protein, meat and poultry also are important and rich sources of micronutrients such as iron, zinc, selenium, and Vitamins B<sub>12</sub>, B<sub>6</sub>, thiamin, riboflavin, niacin, and potassium. Meat and poultry products in the marketplace today, including processed and enhanced meat products, are available in an abundant variety of formulations, which allow consumers to select products best suited for their nutritional and lifestyle needs, preferences and circumstances. Has Health Canada conducted menu modelling to confirm that if a consumer follows the proposed guiding principles and recommendations that it will be possible to meet an individual's nutrient requirements?

In 2015, it was determined that almost half (46%) of Canadians took at least one supplement a day. Is it anticipated based on the proposed Guiding Principles and Recommendations that increased use of supplements will be needed to attain a balanced diet?

Consumers should be educated in the nutrient content of whole muscle meats and poultry and directed to the NfT of prepared meats and other prepared foods such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT or elsewhere e.g. online) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

We question on what scientific basis/evidence HC has moved from the following statement on page 4 of the 2015 HC Evidence Review for Dietary Guidance that:

*"Further precision may be needed in the guidance on certain topics. More specifically: • the link between higher intakes of red and processed meat and increased risk of colorectal cancer"*

to what is now posted in Health Canada's Summary of Evidence Base for Guiding Principles and Recommendations as rationale that:

*"Red meat (beef, pork, lamb and goat): Association between increased intakes of red meat (beef, pork, lamb and goat) and increased risk of colorectal cancer [8] Source: World Cancer Research Fund 2011: CUP report: colorectal cancer"*

*"Processed meat: Association between increased intakes of processed meat (meats processed by smoking, curing or salting, or addition of chemical preservatives) and increased risk of colorectal cancer [15] Source: World Cancer Research Fund 2011: CUP report: colorectal cancer"*

**i.e. on what basis is 2011 "evidence" that was questioned in 2015 now stated as rationale in 2017?**

Specifically, in regard to the WCRF 2011 Report:

WCRF's 2011 CUP meta-analysis indicated processed meat consumed at 50g/d had an 18 per cent increased risk for colorectal cancer; 100g/d of red meat showed a 17 per cent increased risk for colorectal cancer. However, Canadians on average were consuming 22 grams processed red meat and 74 grams of fresh red meat a day - levels **below** those found by WCRF to be problematic, even if processed poultry is factored in. Furthermore, between 2004 and 2015 - the years when the CCHS survey was conducted - red meat consumption declined by half a kilogram, according to Statistics Canada.

Blanket statements suggesting people reduce their red meat consumption do a great disservice to Canadians by contributing to confusion about healthy eating and distracting from real public health concerns like obesity and diabetes. Females, already low consumers of meat and alternatives, would most benefit from an additional serving of red meat in their diet.

Focus should be squarely placed on reducing the alarming statistic that Canadians are getting 22% of their total calories a day from foods low in nutritional value that are not part of the four major food groups in the current Food Guide. See: <http://www.wcrf.org/sites/default/files/Colorectal-Cancer-2011-Report.pdf> and <http://www.statcan.gc.ca/pub/82-003-x/2006004/article/habit/4148989-eng.htm>

**Recommendation 2: Inclusion of foods that contain mostly unsaturated fat instead of foods that contain mostly saturated fat**

**Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

**What do you like about this recommendation?**

N/A

**What do you dislike about this recommendation?**

Consumers should be educated and directed to the NfT such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

The incidence of Type 2 diabetes and cardiovascular disease are actually implicated with sugar and refined carbohydrates and not natural saturated fat.

When the Canadian Heart and Stroke Foundation released their position paper "Saturated Fat, Heart Disease and Stroke" in 2015, the Foundation stated "If Canadians eat a healthy, balanced diet and appropriate portions, saturated fat intake should not be an issue." (Source:

<https://www.heartandstroke.ca/-/media/pdf-files/canada/position-statement/saturatedfat-eng-final.ashx>)

A total diet approach, including all foods, while emphasizing the importance of a varied and balanced diet within calorie needs and engaging in moderate exercise are key to a healthy lifestyle.



**Recommendation 3: Regular intake of water**

**Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

**What do you like about this recommendation?**

Based on current science.

**What do you dislike about this recommendation?**

N/A

We would now like to ask you for your feedback on the Guiding Principle and its recommendations overall. Here it is again for reference.

**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
- . Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat
- . Regular intake of water

\*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.

**Is there anything else you would like to say about Guiding Principle 1 and its recommendations?**

The statements made are too general and do not take the current diets of individuals into consideration (i.e. those already making choices that result in a balanced diets; those already consuming appropriate amounts of fruit/vegetable/meat/dairy/etc.).

The statement *“What is needed is a shift towards a high proportion of plant-based foods, without necessarily excluding animal foods altogether”* could be more appropriately worded *“What is needed for some individuals is a shift towards a higher proportion of plant-based foods while consuming animal foods in moderation.”*

The statement *“A shift towards more plant-based foods can help Canadians: ... eat less red meat (beef, pork, lamb and goat); and ...”* may not be appropriate for those already consuming an appropriate mix of foods that result in a balanced diet. Directing all consumers to consume less of certain foods may result in consumers not attaining a balanced diet.

The Principle and Recommendations are too “simple”. They do not provide sufficient information (e.g. in regard to how foods are prepared/consumed - breaded/fried/sauced/skin on white meat or dark meat poultry vs broiled/grilled/roasted red meats or skin off chicken).

Similar consideration should also apply in regard to how the other foods listed are prepared.

As currently written it appears that poultry regardless of how prepared should be the choice.

At a minimum, the wording should be modified as follows *“... lean poultry, lean red meats ...”*.

Protein values, portion sizes and calories are not included in the Principle or Recommendations (e.g. one would need to consume almost 270 more calories from chick peas to get the same amount of protein - 22 grams - provided in a 75 gram portion of pork which provides 138 calories).

The Recommendations do not recognize the importance of other nutrients provided by nutrient dense foods and their contribution to a balanced diet.

Consumers should be educated in the nutrient content of whole muscle meats and poultry and directed to the NfT of prepared meats and other prepared foods such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT or elsewhere e.g. online) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

The current and amended NfT provide factual information on which to make individual choices that will result in a balanced diet that meets individual needs, preferences and circumstances.

Consumer education (e.g. starting at the elementary school level) is needed to assist all consumers in making knowledge-based decisions that will meet their individual needs, preference and circumstances and result in an overall balanced diet.

Consumers should be educated and directed to the NFt such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NFt) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

The recommendations are too simple and do not provide actionable guidance to enable Canadians to make informed decisions about how to eat a healthy, nutrient adequate, balanced diet. Nutritional guidance should encourage consuming nutrient dense foods, which includes meat and poultry, and move away from consuming energy dense foods. Providing practical, affordable, and achievable guidance by demonstrating how to choose healthier alternatives or incorporate all foods in a balanced diet is needed.

Canadians are not provided with fulsome advice on choosing a balanced, eating pattern by focusing on three nutrients. Canadians are seeking more, not less, nutrition information gauging their interest in vitamins, minerals, antioxidants, phytochemicals, etc.

We question on what scientific basis/evidence HC has moved from the following statement on page 4 of the 2015 HC Evidence Review for Dietary Guidance that:

*“Further precision may be needed in the guidance on certain topics. More specifically: • the link between higher intakes of red and processed meat and increased risk of colorectal cancer”*

to what is now posted in Health Canada’s Summary of Evidence Base for Guiding Principles and Recommendations as rationale that:

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i.e. on what basis is 2011 “evidence” that was questioned in 2015 now stated as rationale in 2017?

Specifically, in regard to the WCRF 2011 Report:

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Blanket statements suggesting people reduce their red meat consumption do a disservice to Canadians by contributing to confusion about healthy eating and distracting from real public health concerns like obesity and diabetes. Females, already low consumers of meat and alternatives, would most benefit from an additional serving of red meat in their diet.

Focus should be squarely placed on reducing the alarming statistic that Canadians are getting 22% of their total calories a day from foods low in nutritional value that are not part of the four major food groups in the current Food Guide. See: <http://www.wcrf.org/sites/default/files/Colorectal-Cancer-2011-Report.pdf> and <http://www.statcan.gc.ca/pub/82-003-x/2006004/article/habit/4148989-eng.htm>.

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?

The statements made are too general and do not take the current diets of individuals into consideration (i.e. those already making choices that result in a balanced diets; those already consuming appropriate amounts of fruit/vegetable/meat/dairy/etc.).

The statement *“What is needed is a shift towards a high proportion of plant-based foods, without necessarily excluding animal foods altogether”* could be more appropriately worded *“What is needed for some individuals is a shift towards a higher proportion of plant-based foods while consuming animal foods in moderation.”*

The statement *“A shift towards more plant-based foods can help Canadians: ... eat less red meat (beef, pork, lamb and goat); and ...”* may not be appropriate for those already consuming an appropriate mix of foods that result in a balanced diet. Directing all consumers to consume less of certain foods may result in consumers not attaining a balanced diet.

The 1992 Food Guide suggested 100 to 300 grams of cooked meat a day depending on your age and gender. According to the 2004 CCHS data, only 1 in 4 adult males had more than 300 grams of meat and alternatives a day. No female age group averaged more than 200 grams of meat and alternatives a day. As well, 14% to 18% of girls aged 9 to 18 had less than 100 grams, as did 15% of women aged 71 or older. (Source: [www.statcan.gc.ca/pub/82-003-x/2006004/article/habit/4148989-eng.htm](http://www.statcan.gc.ca/pub/82-003-x/2006004/article/habit/4148989-eng.htm)).

Advice to reduce meat consumption may have a negative impact on the balanced diets of some consumers (e.g females as these messages seem to resonate most with females).

What is the basis for saying Canadians should consume less red meat when the data shows they have already adjusted consumption down to an appropriate level and, meanwhile, infants, young girls and seniors would see health improvement if they consumed more lean meat? According to Stats Canada’s apparent disappearance data, meat consumption has fallen since 2004. Government advice to further reduce meat consumption may have unintended consequences particularly when it comes to intakes of vitamin B12, and iron and zinc which are more bioavailable in animal products and enhances the absorption from plant sources.

The current and amended NfT provide factual information on which to make individual choices that will result in a balanced diet that meets individual needs, preferences and circumstances.

Consumer education (e.g. starting at the elementary school level) is needed to assist all consumers in making knowledge-based decisions that will meet their individual needs, preference and circumstances and result in an overall balanced diet.

Consumers should be educated and directed to the NfT such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

The Principle and Recommendations are too “simple”. They do not provide sufficient information (e.g. in regard to how foods are prepared/consumed - breaded/fried/sauced/skin on white meat or dark meat poultry vs broiled/grilled/roasted red meats or skin off chicken). As currently written it appears that poultry regardless of how prepared should be the choice.

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Blanket statements suggesting people reduce their red meat consumption do a great disservice to Canadians by contributing to confusion about healthy eating and distracting from real public health concerns like obesity and diabetes. Females, already low consumers of meat and alternatives, would most benefit from an additional serving of red meat in their diet.

Focus should be squarely placed on reducing the alarming statistic that Canadians are getting 22% of their total calories a day from foods low in nutritional value that are not part of the four major food groups in the current Food Guide. The sources of the stats cited

are: <http://www.wcrf.org/sites/default/files/Colorectal-Cancer-2011-Report.pdf> and <http://www.statcan.gc.ca/pub/82-003-x/2006004/article/habit/4148989-eng.htm>.

The recommendations should recognize specific nutrient requirements for certain subpopulations, specifically protein needs throughout the lifespan. Although meat and poultry products supply essential nutrition across the board, their high iron content is critically important to certain subpopulations, such as children with anemia or pregnant women. The reduction of iron in the diet could lead to deficiencies that have long-term health effects if not addressed. Supplementation may be an option, but the heme iron in meat is the most absorbable form of iron known.

Throughout their life span, various subpopulations, in this case children and pregnant women, have increased protein needs during growth and development, and meat and poultry as nutrient dense foods are a logical source. Per serving, meat, poultry, and fish provide more protein than dairy, eggs, legumes, or cereals, vegetables, or nuts. Protein is critical for developing, maintaining, and repairing strong muscles and it is vital for reducing the muscle loss that often occurs with aging. Finally, research shows

that meat's high protein and low carbohydrate content translates into a low glycemic index in people who consume it, which offers benefits for both weight and diabetes control.<sup>1,2</sup>

Note: If you do not work with any of these groups you are still welcome to respond to this question as you see fit.

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<sup>1</sup> Leidy, Mattes. Higher protein intake preserves lean mass and satiety with weight loss in pre-obese and obese women. *Obesity. Obes Res.* 2007; 15: 421-429.

<sup>2</sup> Donald K. Layman, Ellen M. Evans, Donna Erickson, Jennifer Seyler, Judy Weber, Deborah Bagshaw, Amy Griel, Tricia Psota, and Penny Kris-Etherton. A Moderate-Protein Diet Produces Sustained Weight Loss and Long-Term Changes in Body Composition and Blood Lipids in Obese Adults. *The Journal of Nutrition*, March 2009.

## Guiding Principle 2

### Processed or prepared foods and beverages high in sodium, sugars, or saturated fat undermine healthy eating.

Based on the available evidence, Health Canada is proposing the following Guiding principle and Recommendations to emphasize that processed or prepared foods and beverages high in sodium, sugars or saturated fats have the potential to impact health, when consumed on a regular basis. Health Canada recognizes that these less healthy choices will be consumed at times. What matters most is what people eat on a regular basis.

Health Canada acknowledges that some forms of processing, such as pasteurization, have public health benefits. However, foods processed or prepared with high amounts of sodium, sugars, or saturated fat can have a negative impact on health.

### 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
- . Avoidance of processed or prepared beverages high in sugars\*\*

\*\* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

What this means for Canadians

The consumption of processed or prepared foods is on the rise in Canada. At least half of the sugars intake of Canadians come from processed or prepared foods and beverages, such soft drinks, sweet baked goods, fruit juice, confectionary, breakfast cereals, and sweetened dairy products. More than three quarters of the sodium Canadians consume comes from processed foods or foods prepared at restaurants. As well, the **saturated fat intake of about half of Canadians is too high.**

Soft drinks and fruit drinks are main sources of sugars in the diets of Canadians. Avoiding these beverages and other beverages high in sugars can help Canadians cut down on sugars intake. This protects oral health, and may reduce the risk of obesity and type 2 diabetes.

Foods and beverages high in sodium, sugars or saturated fat can be identified using the % Daily Value (DV) on the Nutrition Facts table: 15% or more of the %DV is “a lot” of sodium, sugars or saturated fat.

#### **Do you agree with the following statements about this Guiding Principle?**

	<u>Yes</u>	<u>No</u>	<u>Don't know</u>
It is relevant to my work and/or my organization's work.	X		
It is clear.		X	
It provides enough information.		X	

**Recommendation 1: Limited intake of processed or prepared foods high in sodium, sugars or saturated fat**

**Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

**What do you like about this recommendation?**

N/A

**What do you dislike about this recommendation?**

Dietary decisions should be based on the full nutritional makeup of a food not on whether a food is processed/prepared and not based on only three nutrients.

Due to individual circumstances processed or prepared foods and beverages may be more accessible to certain consumers and such foods when sold packaged carry a NfT on which to make food choices that meet individual needs, preferences and circumstances.

Consumers should be educated and directed to the NfT or other sources of nutrient data such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT or via online nutrient information/databanks) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

Nutritional recommendations should encourage consuming nutrient dense foods, which includes meat and poultry, and move away from consuming energy dense foods. Recommendations that encourage reduced intake of certain food products, like those that are processed, could have unintended consequence on the intake of vegetables, fiber, protein, grains, and dairy. Past recommendations to eat a low fat diet led in part to over-consumption of other food components; consumers merely replaced one over-consumed dietary component with another. Consumers would be better served by providing guidance about portion control and education in regard to selecting and/or preparing foods. Eating a balanced diet from all food groups and engaging in moderate exercise are key to a healthy lifestyle.



## **Recommendation 2: Avoidance of processed or prepared beverages high in sugars\*\***

\*\* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

### **Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

### **What do you like about this recommendation?**

N/A

### **What do you dislike about this recommendation?**

This recommendation does not direct consumers to the NFt for full nutrition information in regard to the products they are considering and/or for comparison purposes between the products being considered.

Consumers should be educated and directed to the NFt such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NFt) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

Care should be taken in using broad sweeping statements.

Portion control and guidance on how to attain a balanced diet would be more helpful to Canadians than blanket statements to avoid all together.

The recommendation does not direct the consumer to consult the Nutrition Facts table where the beverage's complete nutritional information is available. The fulsome information provided in the Nutrition Facts tables allows consumers to make comparisons on which to base individual choices that best fit their dietary preferences and lifestyle needs.

We would now like to ask you for your feedback on this Guiding Principle and its recommendations overall. Here it is again:

**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
- . Avoidance of processed or prepared beverages high in sugars\*\*

\*\* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

**Is there anything else you would like to say about Guiding Principle #2 and the recommendations?**

Not all processed or prepared foods are created equal.

Dietary decisions should be based on the full nutritional makeup of a food not on whether a food is processed/prepared and not based on only three nutrients.

Due to individual circumstances processed or prepared foods and beverages may be more accessible to certain consumers and such foods when sold packaged carry a NfT on which to make food choices that meet individual needs, preferences and circumstances.

Consumers should be educated and directed to the NfT such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

Consumers would be better served by providing guidance about portion control and education in regard to selecting and/or preparing foods. Eating a balanced diet from all food groups and engaging in moderate exercise are key to a healthy lifestyle.

There could be unintended, adverse consequences when consumers are encouraged to replace one dietary component with another. Such a replacement could lead to more energy dense or less nutrient dense choices as to the alternative choice may meet the criteria outlined in this Guiding Principle.

Choices should be made based on a food or beverage's complete nutrition information.

Recognizing the eating patterns of average consumers and providing information about how they can eat a more balanced diet within the context of their existing food choices is critical. This includes demonstrating that all foods can fit in a balanced diet. Providing practical, affordable and achievable guidance by demonstrating how to choose and incorporate all foods and beverages in a balanced diet is needed.

**Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?**

Due to individual circumstances processed or prepared foods and beverages may be more accessible to certain consumers and such foods when sold packaged carry a NfT on which to make food choices that meet individual needs, preferences and circumstances.

The current and amended NfT provide factual information on which to make individual choices that will result in a balanced diet that meets individual needs, preferences and circumstances.

Consumer education (e.g. starting at the elementary school level) is needed to assist all consumers in making knowledge-based decisions that will meet their individual needs, preference and circumstances and result in an overall balanced diet.

Consumers should be educated and directed to the NFt such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NFt) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

Nutritional needs vary over the lifespan. It is essential that recommendations for specific sub-populations are communicated clearly and do not misinform the intended audience. The potential for unintended, adverse consequences is too great when providing oversimplified nutritional guidance.

Note: If you do not work with any of these groups you are still welcome to respond to this question as you see fit.

### **Guiding Principle 3**

Based on the available evidence, Health Canada is proposing the following Guiding principle and Recommendations to highlight that knowledge and skills are a practical way to support healthy eating, and limit reliance on processed and prepared foods high in sodium, sugars or saturated fat.

#### **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
- . Sharing meals with family and friends whenever possible
- . Planning and preparing healthy meals and snacks

What this means for Canadians

Fewer Canadians are preparing meals from scratch, which involves transforming basic ingredients into complete, culturally appropriate meals. Canadians are also increasingly reliant on convenience foods. The increased use of convenience foods is not always due to limited skills, but also to time constraints, or social and economic considerations.

Planning and preparing healthy meals and snacks at home, and selecting nutritious foods at the grocery store or when eating out, are all skills that can help support healthy eating. Preparing and sharing food brings enjoyment to eating when done in the company of family and friends. Having meals together can help reinforce positive eating habits and help children develop healthy attitudes towards food. It can also be a way for people to take part in food cultures they did not grow up with.

As skills are learned and used, the process to select, plan and prepare meals can become less time-consuming and more routine. Building a foundation of knowledge and skills can contribute to improved food choices at any age and can help support life-long healthy eating habits.

Understanding where food comes from and how it is prepared can support more mindful eating practices. These practices include things such as taking time to eat and savour every bite, paying attention to feelings of hunger and fullness, eating slowly with enjoyment, and avoiding distractions while eating.

#### **Do you agree with the following statements about this Guiding Principle?**

	<u>Yes</u>	<u>No</u>	<u>Don't know</u>
It is relevant to my work and/or my organization's work.	X		
It is clear		X	
It provides enough information.		X	

## **Recommendation 1: Selecting nutritious foods when shopping or eating out**

### **Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

### **What do you like about this recommendation?**

Encourages consumers to make “nutritious choices”.

### **What do you dislike about this recommendation?**

The recommendation doesn't assist consumers in making “nutritious choices” (e.g. doesn't reference need for education or direct consumers to the NfT on which fact-based choices can be made and foods can be compared).

The food environment is no more complex than other environments consumers must navigate daily. The recommendation does not provide information on how Canadians can choose more nutritious products. Providing guidance or instructions to consult the Nutrition Facts table would allow consumers to compare different products and enable consumers to choose products that best fit their nutritional and lifestyle needs, preferences and circumstances.

## **Recommendation 2: Planning and preparing healthy meals and snacks**

### **Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

### **What do you like about this recommendation?**

Encourages consumers to plan and prepare meals and snacks.

### **What do you dislike about this recommendation?**

The recommendation is too simplistic.

It encourages consumers to plan and prepare “healthy” meals and snacks but doesn’t tell them how to do this (e.g. doesn’t reference education or direct consumers to the NFT).

Consumers would be better served if provided with guidance about how to select and/or prepare meals including the use of the information provided in the Nutrition Facts table for multi-ingredient foods and available in online databases, etc for single ingredient foods (including meat, poultry, fruits, vegetables, etc).

For some consumers, meal preparation is a challenge. These challenges may arise due to limited experience preparing meals, as well as limited time to shop/cook/afford the meals consumers want to serve their families. Guidance should provide strategies that help consumers achieve a balanced diet within their lifestyle constraints.

### **Recommendation 3: Sharing meals with family and friends whenever possible**

#### **Do you agree or disagree with this recommendation?**

- . Strongly agree
- . Somewhat agree
- . Somewhat disagree
- . Strongly disagree
- . Don't know

#### **What do you like about this recommendation?**

N/A

#### **What do you dislike about this recommendation?**

Do not view this as an appropriate recommendation for eating well as it is not a reality for certain individuals and may have negative impact(s) on such individuals.

Sharing meals with family and friends may not be a reality for certain individuals. Meal companionship may have no impact on healthy eating. Recommendations that do not consider how consumers live and eat will not be adopted and therefore will not improve public health outcomes.

We would now like to ask you for your feedback on the Guiding Principle 3 and its recommendations overall. Here it is again:

**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

**Is there anything else you would like to say about Guiding Principle 3 and its recommendations?**

The food environment is no more “complex” than any other environment/activity that consumers engage in and make individual decisions/choices in. Education and factual, fulsome data is needed rather than simplified messages that provide generalities that may not be applicable to individual consumer needs, preferences and circumstances.

The principle and recommendations do not tell consumers how to do these things. Education is needed. Consumer education (e.g. starting at the elementary school level) is needed to assist all consumers in making knowledge-based decisions that will meet their individual needs, preference and circumstances and result in an overall balanced diet.

The current and amended NfT provide factual information on which to make individual choices that will result in a balanced diet that meets individual needs, preferences and circumstances.

Consumers should be educated and directed to the NfT such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages).

Due to individual circumstances “sharing meals with family and friends” may not be reality for certain individuals and may have negative impact(s) on such individuals.

Nutritional guidance should center around a total diet approach, which highlights moderation, variety, and calorie balance rather than focusing on nutrients or foods to limit. Providing practical, affordable, and achievable guidance by demonstrating how to incorporate all foods in a balanced diet is needed.

**Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?**

The food environment is no more “complex” than any other environment/activity that consumers engage in and make individual decisions/choices in. Education and factual, fulsome data is needed rather than simplified messages that provide generalities that may not be applicable to individual consumer needs, preferences and circumstances.

The principle and recommendations do not tell consumers how to do these things. Education is needed. Consumer education (e.g. starting at the elementary school level) is needed to assist all consumers in making knowledge-based decisions that will meet their individual needs, preference and circumstances and result in an overall balanced diet.

The current and amended NfT provide factual information on which to make individual choices that will result in a balanced diet that meets individual needs, preferences and circumstances.



Consumers should be educated and directed to the NfT and other online sources of nutrition information (e.g. nutrient databases) such that they are able to make knowledgeable decisions (i.e. based on full nutrition information as provided in the NfT or in databases) that will meet their individual needs, preferences and circumstances and result in a balanced diet (e.g. selecting nutrient dense foods and beverages over non-nutrient dense foods and beverages, portion size, calories, etc). Due to individual circumstances “sharing meals with family and friends” may not be reality for certain individuals and such statements may have negative impact(s) on such individuals.

Note: If you do not work with any of these groups you are still welcome to respond to this question as you see fit.

## **Considerations**

Healthy eating recommendations can make an important contribution to nutritional health. To do so, they must be relevant in the Canadian context, no matter where people live, work, learn or play.

### **Determinants of health**

Food choices are not simply a matter of personal choice. There are many interrelated factors that influence our ability to make healthy food choices, including access to and availability of nutritious foods, culture, and the social and physical environment<sup>1</sup>.

Health Canada's proposed healthy eating recommendations are based on the best available evidence, while considering that healthy choices can be affordable, found in different regions of Canada and enjoyed by different cultures. For example, a range of nutritious foods form the foundation of healthy eating: frozen, packaged and canned products are convenient and nutritious options, especially when fresh food is out of season, more costly or unavailable.

Health Canada's proposed healthy eating recommendations aim to improve health of the whole population, while considering the needs of sub-groups to avoid increasing unfair and avoidable differences in health status<sup>2</sup>.

### **Cultural diversity**

Combining nutritious foods in ways that reflect cultural preferences and food traditions can support healthy eating. The cultural make-up in Canada is rich and diverse with over 200 different ethnic origins identified on the Canadian Census<sup>3</sup>. Part of this diversity is represented in the traditions, culture and lifestyles of Indigenous populations. Traditional foods and the harvesting of traditional foods are intrinsically linked to identity and culture, and contribute to overall health<sup>4</sup>.

### **Environment**

The way our food is produced, processed, distributed, and consumed – including the losses and waste of food – can have environmental implications, such as greenhouse gas emissions (GHG), soil degradation, decreases in water quality and availability, and wildlife loss<sup>5</sup>. In 2014, the value of food waste and loss in Canada was estimated at \$31 billion<sup>6</sup>.

The primary focus of Health Canada's proposed healthy eating recommendations is to support health. However, there are also potential environmental benefits of shifting towards healthy eating. In general, diets higher in plant-based foods and lower in animal-based foods are associated with a lesser environmental impact, when compared to current diets high in sodium, sugars and saturated fat<sup>7</sup>. The application of skills, such as planning meals and food purchases can also help decrease household food waste.

1 Special Supplement of the Canadian Journal of Public Health 2005. Understanding the forces that influence our eating habits: What we know and need to know.

2 Public Health Agency of Canada. 2011. Reducing health inequalities: A challenge for our times.

3 Statistics Canada. Immigration and ethnocultural diversity in Canada.

4 Chan L, Receveur O, Sharp D, et al. First Nations Food, Nutrition and Environment Study (FNFNES): Results from British Columbia (2008/2009). Prince George: University of Northern British Columbia, 2011; Chan L, Receveur O, Sharp D, et al. First Nations Food, Nutrition and Environment Study (FNFNES): Results from Manitoba (2010). Prince George: University of Northern British Columbia, 2012; Chan L, Receveur O, Batal M, et al. First Nations Food, Nutrition and Environment Study (FNFNES): Results from Ontario (2011/2012). Ottawa: University of Ottawa, 2014; Chan L, Receveur O, Batal M, et al. First Nations Food, Nutrition and Environment Study (FNFNES): Results from Alberta 2013. Ottawa: University of Ottawa, 2016.

5 Agriculture and Agri-food Canada. 2017. Draft Food Policy for Canada. Available: [www.canada.ca/food-policy](http://www.canada.ca/food-policy).

6 Value Chain Management International. The cost of Canada’s annual food waste. 2014  
 7 Dietary Guidelines Advisory Committee 2015: Scientific report of the DGAC: Advisory report to the Secretary of Health and Human Services and the Secretary of Agriculture. Aleksandrowicz, L., Green, R., Joy, E. J.M., Smith, P., Haines, A. (2016). The Impacts of Dietary Change on Greenhouse Gas Emissions, Land Use, Water Use and Health: A Systematic Review. PLOS ONE. 2016;11(11): e0165797. Nelson, M. E., Hamm, M. W., Hu, F. B., Abrams, S. A., Griffin, T. S. (2016).

**Do you agree or disagree with these considerations?**

	<u>StronglyAgree</u>	<u>SomewhatAgree</u>	<u>SomewhatDisagree</u>	<u>StronglyDisagree</u>	<u>Don’tKnow</u>
Determinants of health					X
Cultural diversity		X			
Environment					X

**What do you like about these considerations?**

It is important that Cultural diversity is included. Cultural diversity should be considered in the recommendations. Nutritional guidance that can be translated effectively in the Canadian lifestyle that accounts for the diversity of ethnicity, cultural beliefs, socioeconomic status, food availability and preferences, health status and physical location is essential.

**What do you dislike about these considerations?**

The “Determinants of health” consideration states that food choices are not a matter of personal choice. Food choices are indeed a matter of personal choice. Consumers have a right to make personal choices that will meet their individual needs, preferences and circumstances.

The “Cultural diversity” consideration does not take into consideration that red meat is a staple food for the vast majority of the Canadian population and has been for generations. Red meat provides a nutrient-rich foundation upon which to build meals. If cultural diversity is a consideration, then red meats should not be minimized in the proposed revision of the food guide.

The “Environment” consideration and HC proposal do not take into consideration the importance of the shelf-life of processed and prepared foods and beverages (i.e. extended shelf-life reduces waste; foods and beverages that are accessible at greater distances and for extended periods of time).

Focus should be placed on reducing food waste and overconsumption of food. There is substantial evidence and agreement that these changes can make a real difference on our environmental footprint. The importance of shelf-life of processed and prepared foods and beverages needs to be considered. Extended shelf-life reduces waste in foods and beverages that are accessible at greater distances and for extended periods of time.

Also, as stated by HC “there are many interrelated factors that influence our ability to make healthy food choices, including access to and availability of nutritious foods, culture, and the social and physical environment”. This is why it is important for HC to situate the Healthy Eating Strategy within the development of the National Food Policy and keep the Food Guide focused on dietary advice. The National Food Policy is the vehicle to address issues like food affordability, improving availability of foods that are culturally appropriate and addressing issues like food waste.

To take one example, from a nutritional perspective it may be desired that Canadians consume more fresh, locally sourced, whole foods, but this may come with a greater environmental footprint. How and where food is produced (including climactic zone, farm scale, soil and water management, plant/animal species, etc.) is a much greater determinant of Green House Gas (GHG) emissions than the distance food travels to market. Similarly, home or restaurant preparation and cooking of perishable, whole foods

may result in more water, energy and waste per calorie of food consumed than preparing the food in an efficient, high yield processing plant that imparts extended shelf life. All of these factors must be considered and validated rather than taking a high level, simplistic view.

The Food Guide should focus on providing meaningful dietary guidance to assist consumers in making educated choices that will result in a balanced diet while meeting their individual needs, preferences and circumstances (i.e. consumers would be better served by providing guidance about portion control and education in regard to selecting and/or preparing foods).

Environmental sustainability is an evolving subject. Researchers have observed that many analyses have relied upon environmental impact per pound produced rather than per calorie supplied. When viewed in the latter manner, meat and poultry are quite “green.”

Processed foods, whether meats, canned vegetables, or other products, lend themselves to a more sustainable food supply. Such production practices allow for maximum utilization of crop yields and minimize the potential for food waste.

Careful consideration is needed to ensure that sustainable diets are such that they will be adopted by and are affordable to consumers. The nutritional adequacy of potential food group substitutions, food safety, and cultural acceptability must also be considered. A one size fits all approach is unlikely to be successful.

Considerable research continues to be needed in regard to sustainable diets.

Thank you for your input

Thank you for sharing your feedback – we look forward to reading your responses. If you have a few minutes now, please help us to evaluate our approach to gathering feedback.

Please answer each of the following:

**Did this consultation give you an adequate opportunity to provide feedback on Health Canada’s proposals?**

.Yes

.No

.Don’t know

**Did this consultation help you to understand the revision process for the Food Guide?**

.Yes

.No

.Don’t know

**Were the instructions to participate in this consultation clear?**

.Yes

.No

.Don’t know

**Were the materials presented to inform your participation in this consultation helpful?**

.Yes

.No

.Don’t know

**Were you able to provide all your comments within the consultation period?**

- .Yes
- .No
- .Don't know

**How did you hear about this consultation?**

- . Word of mouth
- . On social media from Health Canada or the Public Health Agency of Canada
- . Nutrition blog or website
- . News media
- . Update from first phase of the consultation
- . Email from Health Canada's stakeholder registry (Consultation and Stakeholder Information Management System – CSIMS)
- .Other \_\_\_\_\_

**Did you take part in the first phase of the consultation in the fall of 2016?**

- .Yes
- .No
- .Don't know

**If yes, was the feedback you shared in Phase 1 reflected in the proposed revisions presented as a part of this consultation?**

- .Yes
- .No
- .Don't know

**What would you have liked to see in the proposed revisions to the healthy eating recommendations?**

Guidance that reflects the importance of nutrient dense foods rather than just 3 nutrients in attaining a balanced diet.  
Recognition of the importance of and plans for consumer education that will result in the use of the NfT when making choices to meet individual needs, preferences and circumstances that will result in a balanced diet.

**Please share any other comments you have about the consultation process for the Canada's Food Guide revision.**

N/A

**Thank you and next steps**

This print-version of the eWorkbook is intended to assist you in preparing your response to the consultation process. Once you are ready to submit your response, please visit [www.foodguideconsultation.ca](http://www.foodguideconsultation.ca) to complete the online version of this workbook.

Please visit the consultations website at <http://www.foodguideconsultation.ca> for more information about Canada's Food Guide consultation.

Thank you for your valuable participation in this phase of the Food Guide consultation. In the coming weeks, we will be compiling and analyzing all the responses. The results of the consultation will be published in a What We Heard report in late 2017. If you have any further questions, please e-mail us at [Consultations@ipsos.com](mailto:Consultations@ipsos.com) and reference this consultation.