



CANADIAN MEAT COUNCIL  
CONSEIL DES VIANDES DU CANADA

## **House of Commons Standing Committee on Health**

### **Canada Food Guide Study**

Briefing Document

*Canadian Meat Council*

December 8, 2017

## Background

Health Canada's Office of Nutrition, Policy and Promotion released materials for public consultation in the middle of 2017 as part of its ongoing update and modernization of Canada's food guide and Healthy Eating Strategy. This new material included three guiding principles and several recommendations, which was posted publicly on the Health Canada website.

The Canadian Meat Council (CMC) appreciates the opportunity to review the latest material and provide comments on the guiding principles, recommendations and evidence used as rationale. The direction taken by Health Canada in the latest consultation in the guiding principles is concerning to the industry.

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. Although the intent may have been that these guiding principles were not meant for public messaging, by publishing on its website, this is what has effectively happened.

Results of the current consultation is estimated to be ready by end of 2017, or early 2018. The CMC looks forward to continuing to work with Health Canada on this initiative, as the meat industry has a significant amount of expertise when it comes to science based nutrition and dietary requirements, as well in engaging and reaching consumers.

Meat should continue to be part of a balanced diet, as a high quality source of protein that is nutrient dense and provides many things that most single plant sources of protein simply can't provide. The key to a balanced diet is making healthy choices based on several nutritional and lifestyle factors that cannot be easily simplified.

## Overview

The CMC feels that consumer choice is important, and that consumers require an increasingly greater amount of information in making purchasing decisions, especially when it comes to health eating. With a higher number of meals being eaten out of the home, and less time preparing meals overall, it is critical that consumers have the most effective information available to them, at the right place and time.

Educating consumers on the benefits of eating a balanced diet that includes nutrient dense foods in the correct proportions is paramount. With all the choices available, it is difficult to decipher what is a healthy choice or not, while at the store, when lack of information and economics play a large part in that decision.

The CMC believes that further education around the Nutrition Facts Table, its modernization, as well as opportunities for real time information available on smartphones are areas that could have an impact if done correctly. Consumers' choice also depends heavily on economics involved in food purchases, an area that does not seem to have been considered in this food guide consultation.

### Concerns with Guiding Principles

The CMC has reviewed and already provided comments through the Health Canada consultation process on the guiding principles and recommendations. The following are some concerns with the guiding principles that CMC would like to highlight and open for further discussion and debate.

1. It is unclear what the intent of the guiding principles are as part of the food guide review and re-development, and as part of the larger Healthy Eating Strategy.
2. There is not enough information provided to make healthy choices.
  - a. For example: The recommendation to eat more plant proteins does not provide information in regard to actual protein values, quality, 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 and all essential amino acids).
  - b. Health Canada's proposed reductions to red meat consumption are largely based on increasingly discredited IARC and WCRF research that shows an increasingly weak link between meat and cancer
    - i. This study has been updated in 2017 and shows an even lesser association of red meat consumption to colorectal cancer, yet it is unclear whether Health Canada has considered this
    - ii. The World Health Organization's International Agency for Research on Cancer (IARC) also used the WCRF 2011 review, but was criticized heavily by various scientists for its weak epidemiological links
3. There is an erroneous belief that Canadians are over-consuming red meat, when in fact red meat consumption has gone down significantly over the past 50 years, and people are consuming far less than the current Food Guide recommends (*see attached document on meat intake*)
  - a. Red meat consumption in the WCRF is measured having negative associations at levels of 100g/day, when people in Canada consume closer to 50g/day – a study from the UK referenced in the WCRF report showed no positive association to cancer at those consumption levels
4. Increased consumption of fruits and vegetables does not necessitate a decrease in meat consumption. Increased consumption of fruits and vegetables should offset by decreasing consumption of empty calories, carbohydrates and products that do not belong to any of the food groups
5. Red meat consumption provides a feeling of satiety. Health Canada should be focussing on the excess consumption of empty calories and carbohydrates that result in people consuming more food and ever increasing obesity.

## Opportunities for Current Food Guide Consultation

The CMC supports healthy eating for Canadians, including innovative and practical ways to help consumers make healthy choices and eating a balanced diet by providing useful information.

### 1. Providing More Information

- a. The current Canada Food Guide proposed Guiding Principles are high level, vague, confusing, and don't provide enough information to make healthy choices. Even with the more specific recommendations, there is not enough information to make an informed decision.
- b. Directing consumers to eat more or less of a certain food, without understanding their whole diet and lifestyle could in fact be harmful and lead to a less balanced diet and shortages in certain nutrients

### 2. Improving Clarity and Consistency within the Recommendations

- a. The recommendation under Guiding Principle 1 states, *"Regular intake of vegetables, fruit, whole grains, and protein-rich foods\* – especially plant-based sources of protein"* but then later on says, *"Animal foods such as eggs, fish and other seafood, poultry, lean red meats such as game meats, lower fat milk and yogurt, as well as cheeses lower in sodium and fat are nutritious 'everyday' foods"*.
  - i. Protein rich foods is problematic as a definition because – plant sources of protein would technically not be allowed to make a "source of" claim for protein because the criteria considers quality, not only the amount of protein a food provides. However, in the Guiding Principles for the Food Guide, plant sources of protein are considered "protein-rich foods".
- b. The recommendation also mentions that, *"A shift towards more plant-based foods can help Canadians eat less red meat"* but fails to indicate any rationale for eating less red meat, and only says that, *"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"*.
  - i. The above recommends eating less red meat, with little justification, and no indication that meat is one of the foods with high sodium, sugar, or saturated fats.
  - ii. Both of these issues above is misleading and confusing to consumers and offers no value in helping make healthy choices.
- c. Consumers shop for food, not nutrients. Mixing the two also adds to the confusion. Talking about protein, and saturated fats, with fruits, vegetables and meats without linking the two, or further information is not simple and easy to understand for the average consumer.
  - i. A simplified way to get the right information to the consumer at the right time will be the most effective way to create change. The nutrition fact table exists already and consumers have comfort and familiarity with this tool, so it would be logical to expand its use and information offerings.

### **3. Improving Research Cycle**

- a. The research cycle that was completed to update the 2017 Food Guide initiative was completed in 2015, and in some cases used evidence from 2011 or earlier to make recommendations
  - i. The rationale behind the recommendation to focus on plant proteins over red meat looks like it is based on a single review done by the World Cancer Research Fund (WCRF), from 2011<sup>1</sup>
  - ii. The study is a review of several different research papers, and has since been updated in 2017 by the WCRF, which is available. In the current review, the status of red meat association to colorectal cancer has been downgraded. There are several studies within the review that point to no positive association. In most cases as well, the level of meat being eaten in studies where there is a positive association is much higher than the average daily consumption by Canadians and in some cases double.
  - iii. This new research questions the validity of the recommendation by Health Canada, and should be considered in revising these guidelines.

### **4. Development of Innovation and Creative Solutions**

- a. Consumers are craving more information on where their food comes from, and retailers are moving ahead with plans on how to meet this demand. The food industry, from farming associations, food processors, and retailers have significant experience and expertise on how to engage and reach consumers.
- b. Industry and government should work together on innovative ways to communicate with consumers to facilitate information sharing, support health eating decisions, and education.
- c. The majority of consumers have access to smartphones while shopping, and with RFID, QR Codes, or Near Field Communications, there are endless technological options available to provide information in real time to consumers, at the point of purchase.

## **Conclusions**

Meat and other animal foods like milk, poultry and eggs 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, are available in an abundant variety of formulations and price points, which allow consumers to choose products best suited for their nutritional and lifestyle needs, preferences and circumstances.

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<sup>1</sup> World Cancer Research Fund 2011: CUP report: colorectal cancer.

The Canadian Food Guide can be a good resource for consumers, but unless the information is easy to understand, high quality, user friendly and quickly available at point of sale where people make decisions, it is likely it will not be used to the full extent by today's tech savvy consumers.

As a tool for dietitians and other health professionals, the food guide must also be consistent, clear to understand, and must be based on the most current science with clear and strong rationale for any recommendations that a health professional can use to inform their clients or patients.

Overall, the guidelines should focus on providing quality information that people will actually use to make healthy choices in meeting a balanced diet as one part of a healthy lifestyle.

## **Recommendations for Committee**

### **1. Continue to Involve the food industry in consultations on the Food Guide**

- a. The industry has significant expertise in nutrition and food science, but also in engaging with and reaching consumers
- b. The industry can advise on feasibility and practicality of making changes and alternative, creative ways to achieve the same or similar outcomes

### **2. Provide Consumers with More and Useful Information**

- a. Proposed labelling changes to the nutrition fact table, but also possible Front of Package label changes could have an impact on consumer education and purchasing choices.
- b. An updated food guide, without other real time tools for relaying information to consumers, in this day and age, may not get the same use as past food guides.
- c. Innovative and creative ways to engage and inform consumers are important to help them make informed healthy choices.

### **3. Ensure Guiding Principles and Recommendations are justified and backed by the most current science**

- a. CMC doesn't believe the intent of Health Canada was to cut out red meat from the food guide, but by posting public guiding principles essentially stating this, the expectation now will be just that, even though the minimal science and rationale provided does not justify the statements made within the recommendations.

## **Canadian Meat Council**

*Registering annual sales surpassing \$28 billion, exports exceeding \$6.1 billion and providing direct employment for some 66,000 people in both rural and urban locations from coast to coast, the meat industry is the largest component of Canada's food processing sector.*

*Founded in 1919, the Canadian Meat Council represents Canada's federally registered meat packers and processors as well as the industry's numerous suppliers of equipment, technology and services. For more than 96 years the mission of the Council has been to advocate on behalf of the needs of its members to secure and improve Canada's global meat competitiveness. The vision of the member companies of the Canadian Meat Council is that "Canada is trusted as a world leader in the provision of safe and wholesome meat".*

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