



**DAIRY FARMERS OF CANADA SUBMISSION TO THE STANDING COMMITTEE ON HEALTH:
Proposed Changes to Canada's Food Guide**

Dairy Farmers of Canada (DFC) welcomes the opportunity to share our perspectives on the proposed changes to Canada's Food Guide, as well as on other initiatives falling under the Healthy Eating Strategy.

DFC is a national non-profit organization representing Canadian dairy farmers who produce the basic ingredient that is used in the manufacturing of Canadian dairy products - milk. DFC and its team of registered dietitians are committed to increasing the understanding of the nutritional value and benefits associated with milk products as part of a healthy balanced diet. DFC supports nutrition research and develops nutrition education programs for health professionals, the education sector and consumers in collaboration with a variety of health promotion organizations.

The Healthy Eating Strategy is best viewed as a framework covering several interrelated regulatory proposals, including, but not limited to: revisions to Canada's Food Guide, a proposal for Front-of-Package labelling, and new regulations around restricting marketing to children. Each of these proposed initiatives are linked by the fact that they would treat all foods that happen to be above 15% of the daily value (DV) for sodium, sugar, and saturated fat in exactly the same way – as 'unhealthy' or 'to limit' – whether or not they contain other beneficial nutrients, or contribute to reducing chronic diseases.

Canadian dairy farmers care deeply about the health of their fellow Canadians, and are fully supportive of the broad goal of the Healthy Eating Strategy; to help consumers make informed, healthier choices. However, we have some concerns with the proposed approach Health Canada is considering to achieve that goal, and the unintended consequences this approach may have on the health of Canadians.

Does soda have the same nutritional value as whole milk? Are chips the same as cheese? Given all the scientific evidence supporting dairy products, no reasonable person could answer 'yes' to those two questions, and yet, Health Canada's current proposals would put dairy products on an equal – and in some cases worse – footing than products that are void of nutrients. To make matters worse, because of the 15% DV threshold for sodium, sugar, and saturated fat chosen by Health Canada, several types of potato chips and all diet sodas will not even have to carry a front-of-package label, and could therefore be perceived as more healthy than nutrient-rich foods like dairy! This is a critical lack of nuance which will likely only serve to confuse and misinform consumers, and may ultimately put their health at risk.

Proposed recommendations towards dairy in the revised Guide are not evidence-based

When it comes to the Food Guide, in particular, according to the published Guiding Principles of the new Canada Food Guide consultation¹, Health Canada is considering: eliminating the 'Milk and Alternatives' food group, despite the fact that the scientific evidence supporting a role for milk products in the prevention of chronic diseases is stronger than ever; and actively advocating that Canadians shift towards consuming more plant-based foods and beverages, instead of those that are animal based – despite the fact that Health Canada's own 2015 Evidence Review for Dietary Guidance², which will inform the future Food Guide, indicates that the scientific evidence showing that milk products are

¹ Health Canada. Guiding principles. <https://www.foodguideconsultation.ca/guiding-principles-detailed>. Accessed December 6, 2017.

² Health Canada. Evidence review for dietary guidance. Technical report 2015. 2016.

associated with a reduced risk of heart disease, type 2 diabetes and colorectal cancer is as strong if not stronger than it is for vegetables, fruit, whole grain and plant-based protein foods.

Furthermore, Health Canada's evidence review highlights that milk products are under consumed and are associated with bone health and reduced risk of hypertension and stroke. The report also states that Canadians do not consume enough of the following eight nutrients: vitamin D, calcium, magnesium, zinc, potassium and vitamin A, vitamin C and fibre. It is important to note that milk is a valuable source of six of these nutrients.

Prioritizing plant-based sources of protein as the main source of protein over animal based foods such as dairy products is also not supported by evidence. Research continues to confirm that milk proteins rank as some of the highest quality proteins available, and are particularly important for growing children and preserving healthy bones and muscles in aging adults. This is especially important when compared to the plant-based proteins the Government is considering replacing dairy with as sources of protein in the new Canada's Food Guide: unlike milk products, the plant-based sources of protein prioritized by the Government do not even meet Federal requirements to be called "source of protein" on their packaging!

The focus on plant-based foods could also encourage parents of young children to choose other protein-poor fortified plant-based beverages, such as almond and rice beverages, over milk. This could put their children's health at great risk, according to a recent news release by the Dietitians of Canada and the Canadian Paediatric Society³. Other than soy-fortified beverages, plant-based drinks are not nutritionally adequate for young children, even if they are fortified with vitamins and minerals because of their poor protein content⁴. A recent Canadian study also reported that the consumption of plant-based beverages, including soy, was associated with lower childhood height⁵.

Even the evidence surrounding the reduction of the Government's target nutrients (saturated fat, sodium, sugar) is conflicting, at best – particularly when the most recent evidence is taken into account.

As an example, the role of saturated fat in a balanced diet is a complex question, and the targeting of saturated fat (in addition to labelling them as a nutrient of concern) is not scientifically justified. There is strong evidence from several meta-analyses, including a WHO commissioned meta-analysis, that saturated fat does not increase cardiovascular disease risk^{6,7,8,9}. In fact, since 2015, the Heart and Stroke Foundation has opposed the idea of setting a threshold or limit for saturated fat and instead

³ Dietitians of Canada. 2017. Dietitians, paediatricians advise parents to exercise caution with plant-based beverages. <https://www.dietitians.ca/Media/News-Releases/2017/PlantBasedBeveragesChildren.aspx>. Accessed December 6, 2017.

⁴ Fenton T. Plant-based beverages – Are they really healthier for young children? *PEN* 2017.

⁵ Morency ME et al. Association between noncow milk beverage consumption and childhood height. *Am J Clin Nutr* 2017;106:597-602.

⁶ de Souza RJ, et al. Intake of saturated and trans unsaturated fatty acids and risk of all cause mortality, cardiovascular disease, and type 2 diabetes: systematic review and meta-analysis of observational studies. *BMJ* 2015;351:h3978.

⁷ Chowdhury R, et al. Association of dietary, circulating, and supplement fatty acids with coronary risk: a systematic review and meta-analysis. *Ann Intern Med* 2014;160:398-406.

⁸ Siri-Tarano et al. Meta-analysis of prospective cohort studies evaluating the association of saturated fat with cardiovascular disease. *Am J Clin Nutr* 2010;91:535-346.

⁹ Mente A et al. A systematic review of the evidence supporting a causal link between dietary factors and coronary heart disease. *Arch Intern Med* 2009;169:659-669.

argues for a focus on a healthy balanced diet¹⁰. In addition, Health Canada's own evidence review stated that "there was no observed association between dietary saturated fat and the increase of CVD or CHD"¹¹. With respect to the replacement of saturated fat with unsaturated fat, the scientific evidence on this topic is still evolving with more recent research indicating that the replacement of saturated fat with unsaturated fat may not be justified. Since Health Canada's publication of its 2015 evidence review, two studies providing the highest level of evidence (i.e. meta-analyses of randomized controlled trials) have been published and they did not find any benefits on blood lipids, weight and CHD with replacement of saturated fat by unsaturated fat^{12,13}.

When it comes to dairy products, in particular, studies have shown that higher fat dairy foods, including cheese, have not been associated with increased cardiovascular risk, type 2 diabetes, or obesity. They have been found to have either a neutral or beneficial effect on these health outcomes^{14,15,16}. Meanwhile, in spite of the evidence, the language in Health Canada's draft healthy eating guidelines suggests that low-saturated fat foods are healthier than foods with saturated fats.

As another example, Health Canada's guidelines currently recommend that people consume between 1,500 mg and 2,300 mg of sodium per day¹⁷, which is well below the 3,400 mg of sodium per day that Canadians are actually consuming. However, in 2013, the Institute of Medicine (IOM) published a report¹⁸ which concluded that "studies on health outcomes are inconsistent in quality and insufficient in quantity to determine that sodium intake below 2,300 mg/day either increase or decrease the risk of heart disease, stroke, or all-cause mortality in the general US population". This report also concluded that there is "no evidence for benefit and some evidence suggesting risk of adverse health outcomes associated with sodium intake levels in ranges approximately 1,500 to 2,300 mg/day among those with diabetes, kidney disease, or CVD." Moreover, evidence from a strong study (i.e. a meta-analysis of cohort studies and randomized controlled trials) showed that between 2,645 and 4,945 milligrams per day of sodium was associated with the most favourable health outcomes and that an increase in mortality risk was found to be associated with intakes that were outside this range (either higher or lower)¹⁹. In fact research supports that significant sodium reduction be confined to those with

¹⁰ Heart & Stroke Foundation. 2015. Position paper: Saturated fat, heart disease and stroke. <https://www.heartandstroke.ca/-/media/pdf-files/canada/position-statement/saturatedfat-eng-final.ashx>

¹¹ Health Canada. Evidence review for dietary guidance. Technical report 2015. 2016.

¹² Hamley S. The effect of replacing saturated fat with mostly n-6 polyunsaturated fat on coronary heart disease: a meta-analysis of randomised controlled trials. *Nutr J* 2017;16:30.

¹³ Hannon BA et al. Clinical outcomes of dietary replacement of saturated fatty acids with unsaturated fat sources in adults with overweight and obesity: a systematic review and meta-analysis of randomized control trials. *Ann Nutr Metab* 2017;71:107-117.

¹⁴ Chen M et al. Dairy consumption and risk of type 2 diabetes: 3 cohorts of US adults and an updated meta-analysis. *BMC Med* 2014;12:215.

¹⁵ Drouin-Chartier JP et al. Systematic review of the association between dairy product consumption and risk of cardiovascular-related clinical outcomes. *Adv Nutr* 2016;7:1026-1040.

¹⁶ Chen GC et al. Cheese consumption and risk of cardiovascular disease: a meta-analysis of prospective studies. *Eur J Nutr* 2016.

¹⁷ Health Canada. Sodium in Canada. <https://www.canada.ca/en/health-canada/services/food-nutrition/healthy-eating/sodium.html>. Accessed December 1, 2017.

¹⁸ Institute of Medicine. Sodium intake in populations: assessment of evidence. Washington, DC: The National Academie Press, 2013.

¹⁹ Graudal N et al. Compared with usual sodium intake, low- and excessive-sodium diets are associated with increased mortality: a meta-analysis. *Am J Hypertens* 2014;27:1129-1137

hypertension – current evidence no longer supports reducing sodium intake to less than 2,300 milligrams per day for the general population²⁰⁻²¹.

With regards to cheese, it is important to stress that despite its sodium content, cheese does not have adverse effects on blood pressure or cardiovascular health. In fact, it has been associated with a reduction in the risk of stroke and type 2 diabetes^{22,23,24}.

Finally, the scientific evidence targeting “total sugar” is based on studies that have looked at sugar sweetened beverages or SSBs (mainly non-nutritious ones such as soft drinks). These studies have shown adverse associations between SSBs and cardiometabolic outcomes. However, the same cannot be said for all foods to which sugar has been added or sugar intrinsically present in food. In fact, nutritious foods such as sugar-sweetened yogurts are associated with reduced cardiometabolic risk²⁵. Furthermore, milk products naturally contain sugar in the form of lactose which is included in the “total sugar” calculation. The inclusion of lactose is not justified by the scientific evidence, which is primarily based on SSBs, as mentioned previously. It is simply not appropriate to extrapolate research based on the effects of non-nutritious beverages such as soft-drinks to nutritious foods like milk and yogurt.

It is critical that Health Canada take into account the latest, most up-to-date research. The evidence is clear: it is important to consider foods as a whole, and not just by their content of sodium, sugar and saturated fat in judging their impact on health.

Dairy still an important part of the Canadian diet

Over the years, the diets of Canadians have been enriched enormously, thanks in part to the ongoing discovery of new products, flavours, and tastes brought in by new Canadian immigrants. Canadian dairy farmers understand the need to respond to Canada’s ever-evolving cultural mosaic with a revised Guide; that the dietary patterns of many Canadians is broadening is not really up for debate. However, while Canada’s dietary patterns may be evolving, the number of Canadians relying on a variety of dairy products to meet their nutritional needs has remained relatively stable and constant. If Health Canada elects to go ahead with this policy as currently proposed, there is a significant risk that could change – and that would be to the detriment of Canadians’ health.

Conclusion

Dairy Farmers of Canada has made every effort to work as constructively and collaboratively as possible with Health Canada to try and find a nuanced solution that recognizes the nutritional and health

²⁰ Institute of Medicine. Sodium intake in populations: assessment of evidence. Washington, DC: The National Academie Press, 2013.

²¹ Mente A et al. Assessment of dietary sodium and potassium in Canadians using 24-hour urinary collection. *Can J Cardiol* 2016;32:319-326.

²² Chen M et al. Dairy consumption and risk of type 2 diabetes: 3 cohorts of US adults and an updated meta-analysis. *BMC Med* 2014;12:215.

²³ Drouin-Chartier JP et al. Systematic review of the association between dairy product consumption and risk of cardiovascular-related clinical outcomes. *Adv Nutr* 2016;7:1026-1040.

²⁴ Chen GC et al. Cheese consumption and risk of cardiovascular disease: a meta-analysis of prospective studies. *Eur J Nutr* 2016.

²⁵ Sievenpiper JL. Sickeningly sweet: does sugar cause chronic disease? No. *Can J Diabetes* 2016;40:287-295.

benefits of dairy products without diminishing the objectives of the Healthy Eating Strategy. We have sought and held many meetings with many government officials on this issue, including with Health Canada's civil servants, and staff in the Prime Minister's Office, and the Minister of Health and Agriculture's offices. Unfortunately, despite our efforts and all of the scientific evidence we have presented, to this point, there has not been any significant change in Health Canada's position towards dairy products.

Moreover, while we had initially been offered an opportunity to deliver this presentation in person before the Standing Committee on Health, and answer any questions committee members might have as to our position, we were disappointed to learn days before the meeting that our appearance before the committee was cancelled, and will not be re-offered. It is our understanding that the majority on the Committee made the decision to cancel many planned appearances from "industry" stakeholders on this important topic, due to perceptions of 'bias', in favour of hearing instead from "lifestyle" groups, most of which have spoken on Health Canada's behalf in support of this policy in other forums. DFC takes exception to the Committee's division of stakeholders into distinct groups, on the grounds that the implication of this division is that "industry" stakeholders do not care about the health of their fellow Canadians. Canadian dairy farmers are proud of the role that their nutritious products play in supporting a healthy balanced diet, and care deeply about the health of their fellow Canadians – to imply otherwise is completely untrue, and unacceptable.

Our current Liberal government has never hesitated to publically voice its commitment to consultation, and evidence-based policy. Unfortunately, voicing a commitment is not the same as acting upon it. Consultation is meaningless if a government tunes out the message being conveyed when it doesn't support their own opinions or position; evidence-based means nothing if any evidence contradicting the government's position is ignored. If the point of a true consultation is to hear perspectives on both sides of a policy, how is it that the perspectives of those presenting a different view are ignored or silenced, and those groups whose perspectives have largely informed the policy in the first place – are amplified by the Government at every opportunity?

Canada's Food Guide is an important educational tool that aids Canadians in making informed, healthy choices. As a result, perhaps the greatest consequence, if these policies are implemented as currently proposed, is that it could lead a generation of young Canadians to grow up erroneously thinking that dairy products are unhealthy – and push them to turn towards products like chips and diet sodas that don't carry a warning sign, or towards lower quality sources of protein simply because they are not animal-based. This would only worsen the underconsumption of dairy products, and deprive people of their numerous nutritional and health benefits.

Summary of DFCs Requests

For the proposed policies under the Healthy Eating Strategy, DFC requests that:

- Health Canada gives appropriate and fair consideration to dairy products, which are in a unique and position in regards to the Healthy Eating Strategy, and acknowledges that special status.
- The Food Guide and other proposed policies under the Healthy Eating Strategy are truly evidence based, including the most up to date scientific evidence - not simply those that support Health Canada's views.
- If the format of the new Food Guide includes food groups, that the Government maintains the long-standing Milk and Alternatives group.

- The Government not solely define the overall healthfulness of a food, for any policy under the Healthy Eating Strategy, by its levels of sodium, sugar, or saturated fat.
- Any Front-of-Pack labelling regulations grant exemptions for nutrient-rich dairy products and not worsen their under consumption.
- The nutritional and health benefits of milk products continue to be recognized adequately and featured prominently in the revised Food Guide.
- The Food Guide not inappropriately discourage nutrient rich animal based protein sources and disproportionately encourage plant based sources of protein .
- The Food Guide focuses on moderation and a balanced diet, instead of on limiting three “negative nutrients.”
- Health Canada employ a more nuanced approach that takes into account the distinction between nutrient-rich and nutrient-deficient foods, and doesn’t lump them together.

Since the first edition of the Guide in 1942, the evidence has consistently supported milk products as an affordable and rich source of essential nutrients. If you agree that the best way to achieve a healthy diet is balance and moderation, then please speak up and let Health Canada know that you continue to support milk and dairy products as part of a healthy, balanced diet.

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