



Ontario Society of Nutrition
Professionals in Public Health

La société ontarienne des professionnel(le)s
de la nutrition en santé publique

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November 13, 2006

The Honourable Tony Clement,
Minister of Health
Minister's Office - Health Canada
Brooke Claxton Building, Tunney's Pasture
Postal Locator: 0906C
Ottawa, Ontario, Canada
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Dear Minister Clement

**RE: TRANSforming the Food Supply Report of the Trans Fat Task Force,
June 2006**

We are writing to urge you to implement the recommendations contained in the final report of the Trans Fat Task Force, ***TRANSforming the Food Supply***, submitted in June 2006. The implementation of the recommendations contained in this report will have a significant impact on the health of Canadians.

OSNPPH is the independent and official voice of Registered Dietitians in public health in Ontario representing over 150 members working in every Health Unit/Department in the province. Members of OSNPPH work in public health units, public health nutrition education, and research and development. We are specialists in applied human nutrition, are members of the College of Dietitians of Ontario, and focus on health enhancement and disease prevention.

Trans fatty acids contained in processed foods are not essential and provide no known benefit to human health. The U.S. National Academy of Science, Institute of Medicine, has recommended that trans fat be kept as low as possible in the diet because any increase in trans fatty acid intake increases the risk of Coronary Heart Disease¹.

The regulatory approach proposed by the Task Force is one that OSNPPH strongly endorses. A regulatory approach to decreasing the consumption of trans fat will benefit the health of the entire population from a public health perspective. A voluntary approach to reducing trans fat in the food supply would be inadequate, since it is unlikely industry will voluntarily reduce trans fat regardless of the scientific evidence. There is evidence to suggest that a voluntary approach would likely result in increased health disparities since food products bearing trans free health claims would likely be more expensive. People living on a low income will be challenged to afford the higher priced products and would therefore likely consume a higher amount of trans fat in their diets, putting them at greater risk for heart disease.

Given the state of the evidence and the public health implications, it is important that Health Canada moves quickly to develop regulations based on the recommendations of the Task Force. OSNPPH would recommend a shorter implementation period than the “2+2” approach recommended by the Task Force that would not see regulations finalized until June 2008, with a phase-in period extending for another 2 years. The food industry has been aware of this issue for many years, and many food product manufacturers have already taken steps to replace trans fats in their food products. We believe that a prolonged phase-in period is unnecessary and will only serve to appease the food products manufacturers while at the same time compromising the health of the public. In addition, adequate provisions will need to be made within the regulations to ensure compliance. Significant penalties must be established for non-compliance to ensure the regulations are effective.

The recommendations of the Trans Fat Task Force provide an opportunity for the Government of Canada to take a positive step towards improving that health of Canadians. I would urge you and your government to act decisively by implementing these excellent recommendations to reduce the amount of trans fat in the Canadian food supply.

¹ Institute of Medicine of the National Academies. Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids. Panel on Macronutrients, Panel on the Definition of Dietary Fiber, Subcommittee on Upper Reference Levels of Nutrients, Subcommittee on Interpretation and Uses of Dietary Reference Intakes, and Standing Committee on the Scientific Evaluation of Dietary Reference Intakes. Food and Nutrition Board. The National Academies Press Washington D.C. 2002/2005.

Sincerely,

Dianne Oickle, MSc, RD
Chair, The Ontario Society of Nutrition Professionals in Public Health

Cc.

Dr. David Butler-Jones – Chief Public Health Officer of Canada
Dr. Sheela Basrur – Chief Medical Officer of Health
Erica DiRuggeiro, Chair, Ontario Collaborative Group on Healthy Eating
Hon. George Smitherman, Ministry of Health and Long Term Care
Dr. Sheela Basrur, Chief Medical Officer of Health for Ontario
Connie Uetrecht, Executive Director of Ontario Public Health Association
Linda Stewart for Advocacy Committee of ALPHA