

A Food Policy for Canada

Dietitians of Canada response to
Agriculture and Agri-food Canada

September 29, 2017

Dietitians of Canada (DC) is the national professional association for dietitians, representing close to 6,000 members at the local, provincial and national levels. As the voice of the profession, DC strives for excellence in advancing health through food and nutrition and through our members, we provide leadership in shaping food and nutrition policy that promotes the health of Canadians.

This DC document provides high-level comments, recommendations and questions in response to Agriculture & Agri-food Canada's (AAFC's) current consultation on [A Food Policy for Canada](#), launched in May 2017. DC applauds the Government of Canada's commitment to developing a national food policy, as mandated by the Prime Minister of Canada to the Minister of Agriculture and Agri-food Canada (AAFC) in November 2015: "Develop a food policy that promotes healthy living and safe food by putting more healthy, high-quality food, produced by Canadian ranchers and farmers, on the tables of families across the country".

Dietitians are very pleased to read the comprehensive vision proposed through the themes described in [A Food Policy for Canada](#) and the inter-departmental collaboration contributing to the development and implementation of this policy work. For more than a decade, DC has participated at multi-stakeholder tables, including providing active input to the development of [Canada's Agri-Food Destination – A new strategic approach](#), and contributions of our DC members to the development of Food Secure Canada's paper, [Resetting the Table: A People's Food Policy for Canada](#), and recent discussion described in [Five Big Ideas for a Better Food System](#). We continue to recommend these foundational documents to be used towards the development of A Food Policy for Canada.

As an association of health professionals with evidence-based expertise in food and nutrition, DC wishes to emphasize at the outset in this brief, our recognition of the tremendous efforts of many farmers and other stakeholders within the food system to produce healthy foods, while minimizing impacts on the environment and contributing to jobs and the general social and economic stability in Canadian communities. The comments and questions provided in this brief are intended to improve clarity and provide more detail, where we perceive this to be needed. They are also intended to generate even greater commitment across all sectors, to achieve even more positive and sustainable outcomes of mutual benefit to the Canadian population, especially for vulnerable populations, communities and environments identified within Canada.

This document is divided into two parts:

- **Part 1: DC's recommendations for A Food Policy for Canada**
- **Part 2: DC's specific responses to AAFC's consultation on A Food Policy for Canada**

Part 1: DC's Recommendations for A Food Policy for Canada

To ensure the mandate and vision for A Food Policy for Canada is achieved, DC offers the following five recommendations. A Food Policy for Canada must:

1. include nutrition and health as key policy drivers to ensure a sustainable food system that promotes healthy diets,
2. address the urgent challenges and unique food systems in northern and remote communities and of Indigenous peoples,
3. include inter-departmental collaboration within and amongst governments in Canada to provide policy interventions and solutions that address complexities in Canada's food system,
4. have clear definitions, measurable indicators and a long-term commitment to regular monitoring and evaluation, and
5. include early public outreach and education to involve Canadians at the onset. This can be supported through a) implementation of a pan-Canadian Food and Nutrition Contact Centre that would provide Canadians with free, easy access to dietitians for credible, evidence-based food and nutrition information, and b) strategies and action through which food literacy is improved, including more food literacy education in schools.

Recommendation 1:

A Food Policy for Canada must include nutrition and health as key policy drivers to ensure a sustainable food system that promotes healthy diets.

Substantial change is needed to reduce the burden of diet-related disease, reflected in increasing health care costs and other social and economic costs to society and the wellbeing of the population. Full policy integration with a common vision for population health *and* the social, environmental and economic sustainability of the food system is critical to balancing current inequities and costs to publicly-funded systems and negative consequences to Canada's population. Many factors impact the capacity of Canadians to consume a healthy diet. In Canada, increased risk for developing diet-related chronic diseases is most often related to excessive calorie intakes and overconsumption of foods and beverages high in nutrients of public health concern (sodium, sugars, saturated fat, trans fat) and (often) low in other nutrients of which Canadians need more. People with diet-related chronic diseases are at further risk for negative consequences to well-being, including disease-related side effects or complications impacting physical and mental health, decreased capacity for work, social isolation, and premature death – the “indirect” costs.

Health Canada recently completed an [Evidence Review for Dietary Guidance: Summary of Results and Implications for Canada's Food Guide](#), which specifically affirmed conclusive evidence for relationships between sodium and increased risk of high blood pressure, trans fatty acids and increased risk for cardiovascular disease, and dietary patterns associated with positive cardiovascular disease outcomes - characterized by higher consumption of vegetables, fruits, whole grains, low-fat dairy, and seafood, lower consumption of red and processed meats, refined grains, and sugar-sweetened foods and beverages. The Evidence Review was followed by [proposed new Dietary Guidance and revisions for Canada's Food Guide](#), emphasizing health promotion and disease prevention, and including environmental considerations. To date, Health Canada has made the following *recommendations within three proposed Guiding Principles*: (1) 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. (2) limited intake of processed or prepared foods high in sodium, sugars or saturated fat; avoidance of processed or prepared beverages high in sugars, and (3) selecting nutritious foods when shopping or eating; planning and preparing healthy meals and snacks; sharing meals with family and friends whenever possible. Furthermore, *environment considerations* are proposed to include the way our food is produced, processed, distributed, and consumed, including the losses and waste of food; address greenhouse gas emissions, soil degradation, decreases in water quality and availability, and wildlife loss.

As governments (federal/provincial/territorial) seek to modernize their approaches to managing food safety and risk assessment in food processing plants, it is especially important to consider how regulation and enforcement will affect small and medium size enterprises, to minimize costs and barriers that may be more difficult for these businesses to manage and inadvertently discourage new start-ups (which may be particularly important as part of a vibrant local food system). As well, there must be sensitivity in how land and water access is negotiated with Indigenous peoples, where there may be conflicting priorities, e.g., tradition of catching and eating fish vs limiting fish consumption due to known presence of high levels of heavy metal contamination.

Whereas consumers are ultimately responsible for their individual choices, mounting evidence from the past five decades indicates that changes in the food supply and food environment have driven change in consumer eating habits, with some serious consequences to long-term health. Consumer choices, it could be argued, are no longer simple and not consistently healthy – while there may be a wide range from which to choose, the choices are often not healthy choices, so the “food environment” (where people live, work and play, where they buy their food) is often a barrier for consumers who may want to make healthier choices. Increased profitability for growing crops that are in high demand by food processors and the degree of ‘value added’ from ingredients and formulation in industrially processed foods have driven a ‘nutrition transition’, which has incurred substantial costs to health, the environment and other social impacts. DC is pleased to see the recognition of these important themes in A Food Policy for Canada, proposed by AAFC for consultation.

Recommendation 2:

A Food Policy for Canada must address the urgent challenges and unique food systems in northern and remote communities of Indigenous peoples.

Food insecurity is often viewed erroneously as a “food problem”, related to the price of food; it is *primarily* a problem caused by inadequate, insecure income – not having enough money to buy sufficient nutritious food, after paying for other household needs like housing. About one in eight households in Canada experience some degree of food insecurity (marginal, moderate or severe), with particularly high prevalence and severity in the Territories.

Food Policy in Canada must *drive income-based solutions to household food insecurity*, to ensure sufficient, secure incomes and resources/capacity so that all Canadian households can acquire nutritious foods in ways that preserve human dignity. DC supports a National Poverty Reduction Strategy [DC response to Poverty Reduction Strategy in Canada](#) that explores a guaranteed minimum income for all Canadians and seeks to improve the affordability of food, housing, transportation and child care. Food charity (e.g., food banks) should not be supported as the entrenched way within Canada’s food system to provide food to food-insecure households, nor should these facilities be the recipients of food waste from industry or retail settings, unless they have capacity to handle donations and are in need of the particular type of product to be donated. DC has also written about the issue of food waste, in our response to [Ontario’s Poverty Reduction Strategy Office, with respect to Food Security Strategy](#), and also to [Ontario’s Ministry of Environment and Climate Change](#), to recognize that food charities do not necessarily have capacity for, nor should they become part of a mainstream solution to, handling excess food/ potential food waste.

In 2014, the total prevalence of marginal, moderate and severe household food insecurity in Nunavut was 46.8% (almost half the population) and in the Northwest Territories, 24.1% (data for the Yukon was not collected during that cycle of the Canadian Community Health Survey) ([Household Food Insecurity in Canada, 2014](#)). DC has written and advocated extensively about these issues within DC’s [position paper with recommendations about household food insecurity](#). The solution for household food insecurity lies in *addressing the cause*, which is to ensure fair and sufficient income for all residents of Canada, effectively eliminating the need for charitable food distribution and making food affordable for all (i.e., in proportion to incomes and in proportion to food prices specific to the region in which people live; in very remote regions, there may be further barriers to physical access to food, through retail or insufficient money/resources to access grown/hunted foods near one’s community).

Solutions to address household food insecurity could also help to decrease the incidence of disease and use of the health care system. In Ontario, policy researchers from PROOF determined that, after adjusting for other well-

established social determinants of health such as education and income levels, total annual health care costs were 23%, 49% and 121% higher for adults living in marginally, moderately and severely food insecure households, respectively, compared to food secure households¹. Targeted policy interventions would likely reduce the associated health care costs and improve overall health.

In Canada's North and other remote communities, the expense and logistics of food distribution adds substantially to the price of food and availability of a variety of healthy foods. While food is relatively cheap in Canada, about 10% of average household income, it's entirely unaffordable in some regions. In 2015, the "average" Canadian household of four spent \$8,629/yr on food²; in Attawapiskat, an isolated First Nation community in northern Ontario, it was \$22,908/yr³. There is need for policy action and intervention to address distribution challenges and price inflation of foods so that residents have access to nutritious, culturally-acceptable foods at a price that is in proportion to their incomes, similar to that in southern/urban areas of Canada. As well, Canadians need to have access to food within a reasonable, accessible distance and/or have community-based storage capacity for staples and frozen foods – a challenge for people living month-to-month, and especially in some regions where transportation depends on season/weather.

Policy changes must be considered by the federal government departments, Indigenous Services and Crown-Indigenous Relations and Northern Affairs, to address household food insecurity in all Indigenous communities in Canada, especially in Canada's northern communities. The remote community, transportation subsidy program for fresh nutritious foods known as Nutrition North Canada (NNC) does not sufficiently address the larger and more serious issue of widespread food insecurity in our three northern territories and northern regions of provinces where many First Nation reserves are located. The scope and severity of food insecurity in northern and remote regions, especially among Indigenous peoples, requires greater investment of resources. The limitations of NNC – including the limited number of eligible communities, limited subsidy for transportation of nutritious foods, and focus on store-bought foods over country foods – prevent it from positively impacting the food insecurity crisis across the north.

DC recommends the development of policy that will ensure equitable access to healthy, culturally acceptable food for all residents and households in Canada's north, to directly address the regionally high prevalence and severity of household food insecurity. It is our view that government efforts should recognize and target the needs of vulnerable populations directly with income subsidies and/or subsidies directed to improving access to basic market foods, including staples, *and* to support greater access to traditional or country foods. Such an approach will result in more long-term benefits to health within this population that currently experiences substantially greater rates of chronic health conditions and social challenges associated with poverty.

Potable water must be a community standard across Canada - residents in all Canadian communities should have affordable, easy access to safe drinking water from the tap. DC is particularly pleased to note the recent engagement on the [Safe Drinking Water for First Nations Act](#), to help find long-term actions to ensure safe drinking water for residents of First Nations communities. This Act allows the Government of Canada and First Nations to develop federal regulations to ensure clean water. DC noted concerns about potable water supply in our past two pre-budget submissions to federal government.

¹ Tarasuk, V., Cheng, J., de Oliveira, C., Dachner, N., Gundersen, C., & Kurdyak, P. (2015). Association between household food insecurity and annual health care costs. *Can Med Assoc J.* 187(14), E429-E436.

² Average Household Expenditure, by Province (Canada), Statistics Canada, 2015 (from AAFC resource for A Food Policy for Canada – Increasing Access to Affordable Food)

³ Paying for Nutrition. A Report on Food Costing in the North.

https://foodsecurecanada.org/sites/foodsecurecanada.org/files/201609_paying_for_nutrition_fsc_report_final.pdf

Recommendation 3:

A Food Policy for Canada must include inter-departmental collaboration within and amongst governments in Canada to provide policy interventions and solutions to address the challenges within Canada’s food system, and a governance mechanism, to support the ongoing development and implementation of A Food Policy for Canada.

Food policy governance has been defined as “a critical factor in operationalizing food policy to achieve sustainable diets”, wherein other factors include health & nutrition; environment; social values; quality; and economy⁴. Inter-departmental collaboration within and amongst governments in Canada is essential to provide policy interventions and solutions to address the challenges within Canada’s food system and barriers to access to food that is nutritious and safe and affordable. DC also recognizes the urgent need for a governance mechanism within A Food Policy for Canada, to support the ongoing development and implementation of A Food Policy for Canada. To this end, DC has contributed to and been represented within an inter-sectoral process, submitting a white paper⁵ to AAFC with our proposal for governance.

We note the importance of shared understanding, as discussed by the Canadian Federation of Agriculture (CFA) in their recent discussion paper, [A Food Policy for Canada: Finding Common Ground](#). CFA has acknowledged that “diverse stakeholders bring diverse backgrounds, perceptions, and knowledge bases” which “can be a source of strength and forward-looking innovation to address emerging issues through new collaborations and multi-disciplinary dialogue”. However, as CFA points out, “if not properly grounded in a common understanding of issues, this diversity can challenge the process by creating division and ultimately undermine the capacity to develop and implement an aligned strategy”. Through strong governance and ongoing dialogue, an evidence-based vision and framework must be developed and jointly agreed to by all stakeholders. This framework must address unintended consequences and align with existing policy initiatives as much as possible.

Recommendation 4:

A Food Policy for Canada must have clear definitions, measurable indicators and a long-term commitment to regular monitoring and evaluation.

DC recommends more concise definitions of the elements within the vision for Food Policy for Canada and further discussion of how these elements will be prioritized in relationship to each other. The underlying values or principles that drive food policy direction must also be articulated and held in common by all stakeholders. Health and environmental goals should be defined in a context of tangible, measurable indicators that will be regularly monitored, including for:

- population health and well-being
- reduced rates of diet-related chronic diseases
- reduced rates of household food insecurity, at all levels of severity, marginal, moderate and severe *(Note: DC has recommended measurement of food insecurity as an outcome indicator for the [Federal Poverty Reduction Strategy](#) – to measure the impact and evaluate outcome of strategies to reduce poverty and household food insecurity www.dietitians.ca/foodinsecurity)*
- consistent well-being of workers within the food system (protection from harm; fair and equitable working conditions and incomes)

⁴ Mason P, Lang T. Sustainable Diets: How Ecological Nutrition Can Transform Consumption and the Food System. Routledge, 2017. ISBN-13: 978-0415744720.

⁵ The Case for a National Food Policy Council - Report by the *ad hoc* Working Group on Food Policy Governance. Submitted to Agriculture & Agri-food Canada. October 1, 2017.

- consistent well-being of animals raised, hunted or caught for human consumption
- environmental sustainability as indicated by reduced greenhouse gases and carbon footprint, protection of land, air and water resources and biodiversity, to sustain food production capacity in future generations.

Long term commitment and monitoring of impacts to provide information needed for full cycle evaluation and continuous improvements and adjustments is essential to ensure the mandate and vision for A Food Policy for Canada is achieved. While the Barton report⁶ describes the agri-food sector as representing “a distinctive opportunity for Canada to boost inclusive economic growth based on a rich natural endowment”, DC cautions that any such economic growth must first account for the costs of externalities to health, the environment and society as a whole, before Canada can work to expand as the trusted global leader in safe, nutritious, and sustainable food for the 21st century⁷ it seeks to become. The Common Ground report⁷ from Canadian Federation of Agriculture sums up many excellent points here, from their June 2017 meeting with stakeholders.

Recommendation 5:

A Food Policy for Canada must include early public outreach and education to involve Canadians at the onset. [This can be achieved with a) implementation of a pan-Canadian Food and Nutrition Contact Centre that would provide Canadians with free, easy access to dietitians for credible, evidence-based food and nutrition information, and b) strategies and action through which food literacy is improved, including more food literacy education in schools.]

Canadians need a way to connect with reliable, accurate food and nutrition information, to increase food literacy and support them in making healthy food choices, effectively responding to agriculture and agri-food innovations and efforts, creating more demand for healthy food environments and an overall sustainable food system. For stakeholders in the food system, the next few years are a critical and important time to encourage and facilitate more collaboration, bringing together different sectors and professions and exploring beyond silos to find common ground. We emphasize that Food Policy in Canada must be a system-wide transition – consumer education and ‘will’ cannot shift health outcomes alone. A sustainable food system that supports healthy diets must provide the setting for healthy food environments, where the de facto outcomes are to make healthy eating the easy choice.

Residents of Canada must be empowered in their food choices, to have healthy choices available and sufficient income to gain access to food. Sufficient food literacy (food skill & knowledge) is especially important for children and youth – and should be considered through education systems.

DC has proposed short-term options to AAFC and Health Canada for **a pan-Canadian Food & Nutrition Contact Centre that would provide free, easy access to dietitians across Canada.** A Food and Nutrition Contact Centre would build consumer knowledge and appreciation for healthy eating choices, food safety, food production, reducing food waste, planning & preparation of meals for higher risk populations using expertise and database with evidence and resources already developed through DC for multi-modal contact with phone/email/website access. Such a system of related Contact Centres across Canada would enhance understanding and trust in the Canadian food supply, filling current gaps in access to the services of dietitians, especially for Canadians living in rural and remote areas of Canada typically underserved. Dietitians are a trusted, credible source of food and nutrition information. There is already some dietitian contact centre infrastructure for answering consumer questions and providing guidance for policy and program implementation in some provinces.

⁶ Advisory Council on Economic Growth. Unleashing the growth potential of key sectors. February 2017.

⁷ Canadian Federation of Agriculture. Finding Common Ground - A collaborative discussion on shaping Canada’s national food strategy. 2017.

Part 2: DC's Specific Responses to AAFC's Consultation on A Food Policy for Canada

"The time is ripe for the leaders in government and public agencies to engage the policy levers needed to not only enable such movement but serve as catalysts."⁸ DC commends the federal government and AAFC's leadership in its inter-departmental approach toward building A Food Policy for Canada. As recommended in their recent book, *Sustainable Diets*, Mason and Lang [footnote 4] have stated that food policy must be "owned by government and championed by more than one government department or agency", with a "wide range of independent expertise, spanning health, environment, social science and economics", followed by "consultation with civil society organizations and industry... recognizing "environmental impact of excessive consumption of food energy and food waste".

With respect to AAFC's definition of a food policy, "a way to address issues related to the production, processing, distribution, and consumption of food",

DC recommends the following expanded definition for Food Policy:

'a way to address issues related to the *harvesting and* production, processing, distribution, *preparation*, consumption and disposal of food, committed to values of population health and the social, environmental and economic sustainability of the food system'.

The underlying values or principles that drive food policy direction must be articulated and held in common by all stakeholders; outcome indicators must be monitored to ensure effective policy implementation.

With respect to the vision for A Food Policy for Canada, "a long-term vision for the health, environmental, social, and economic goals related to food, while identifying actions we can take in the short-term",

With respect to A Vision to Inspire Action, "The Canadian food system provides a sustainable food supply so that all people living in Canada, no matter where they live, have the ability to access a sufficient amount of safe, nutritious, and culturally-appropriate food, that in turn contributes to their health, and that of our environment and our economy."

DC agrees with these visions, recognizing the additional time needed to develop long-term action and support for positive impacts overall. The vision of a Food Policy for Canada, driven by population health needs and disease prevention and food system sustainability, must be implemented in a context of the food supply value chain and competitive economic dynamics within and among sectors of the food system.

Each of the four proposed themes in A Food Policy for Canada are discussed below, according to DC's understanding of the theme descriptions and intent, with recommendations for change as deemed relevant. It is understood that the proposed themes must be clear and garner mutual support from stakeholders, before further detail can be developed and implementation begins.

⁸ Canadian Agri-food Policy Institute (CAPI). [Canada's Agri-Food Destination – A new strategic approach](#). (2011) - an excellent visionary report, with contributions from a wide variety of stakeholders, including Dietitians of Canada.

THEME 1: INCREASING ACCESS TO AFFORDABLE FOOD

Improving Canadians' access to affordable, nutritious, and safe food.

Not all Canadians have sufficient access to affordable, nutritious and safe food. We need to do more to improve the affordability and availability of food, particularly among more vulnerable groups, such as children, Canadians living in poverty, Indigenous peoples, and those in remote and Northern communities.

- *Ensuring that all Canadians can access nutritious food no matter where they live.*
 - *Supporting the growth of local and regional food production.*
 - *Making nutritious food more affordable for all Canadians.*
 - *Working with partners to improve access to nutritious foods around the world.*
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DC's response to Theme 1:

AAFC's theme of "Improving Canadians' access to affordable, nutritious, and safe food" will require more detail about implied problems and solutions, to ensure that solutions address the cause of problems and health equity and promotion are highly valued. We view this theme to be about *ensuring equitable access to healthy food*, which is essentially a greater imperative than improving access. DC suggests this theme is about *ensuring* all Canadians have *equitable physical and economic/financial access* to nutritious, safe *and personally acceptable* food; it is about addressing income inequities to reduce household food insecurity, so that food is affordable wherever people live and can be acquired with dignity by all households in Canada.

DC understands this theme to be primarily about **consumer/ household economic issues** and **social values** within Food Policy.

Access to affordable food: Many Canadians (about one in eight) live in food insecure households, where they do not have sufficient access to affordable, nutritious and safe food due to problems of income insecurity and/or limited variety and physical access, as is more common in remote and northern communities. Dietitians often distinguish between 'food affordability' (having sufficient financial resources to be able to afford and purchase food in one's geographic area of residence) and 'food prices' (which vary according to many factors, including supply and demand, marketing etc). The affordability and availability of food, particularly for vulnerable populations, such as households living in poverty, Indigenous peoples and residents in remote and Northern communities, need to be addressed both individually and as a whole. This can be achieved by asking the right questions and being open to a variety of answers, not all of which will be based within the food system per se.

Research is needed to inform policy direction to address food affordability and household food insecurity in Canada. *Affordability* of food (for local, domestic and/or imported foods) varies greatly, according to income disparity, and especially in more remote and northern regions. In the Territories for example, some households have high incomes *and* receive additional allowance from their employers to compensate for the higher cost of living and relative isolation in the region, while others (many of whom are Indigenous peoples) subsist on publicly funded, inadequate income support and experience a high prevalence (almost half of the population in Nunavut) of household food insecurity. In contrast, most of Canada's population (i.e., in more southern regions) has relatively good physical access to and can afford food (it's even relatively inexpensive *on average* - in 2013, food accounted for only 10.1% of all household expenditures in Canada⁹ - although many households with limited incomes have no money for food, after paying for

⁹ An Overview of the Canadian Agriculture and Agri-Food System 2016. <http://www.agr.gc.ca/eng/about-us/publications/economic-publications/an-overview-of-the-canadian-agriculture-and-agri-food-system-2016/?id=1462288050282#a2>

other necessary expenses¹⁰. Some important questions need to be researched and addressed within a food policy framework:

- What price factors can be addressed through innovation and food storage capacity and where will supports/subsidies be needed to achieve appropriate, timely distribution in hard-to-reach areas?
- In remote regions, how can residents be assured of physical and economic access to a variety of nutritious, personally and culturally acceptable foods?
- What are *fair* prices for nutritious foods in different regions of Canada? (Dietitians understand that it is essential to ensure fair income and safe conditions for farmers and other workers in the food supply chain, animal welfare and environmental stewardship.)
- How can production and processing of foods (local/domestic/imported) be best supported as part of the investment in regional/local economies and the social framework, to preserve local agricultural resources and promote health/well-being (especially as related to the prevention of diet-related diseases)?

Income security is needed: Food Policy in Canada must *drive income-based solutions to household food insecurity*, to ensure sufficient, secure incomes and resources/capacity so that all Canadian households can acquire nutritious foods in ways that preserve human dignity. DC supports a National Poverty Reduction Strategy [DC response to Poverty Reduction Strategy in Canada](#) that explores a guaranteed minimum income for all Canadians and seeks to improve the affordability of food, housing, transportation and child care. Food charity (e.g., food banks) should not be supported as the entrenched way within Canada's food system to provide food to food-insecure households, nor should these facilities be the recipients of food waste from industry or retail settings, unless they have capacity to handle donations and are in need of the particular type of product to be donated. DC has also written about the issue of food waste, in our response to [Ontario's Poverty Reduction Strategy Office, with respect to Food Security Strategy](#), and also to [Ontario's Ministry of Environment and Climate Change](#), to recognize that food charities do not necessarily have capacity for, nor should they become part of a mainstream solution to, handling excess food/ potential food waste.

An urgent need to address Indigenous Peoples' food insecurity: Canada's Food Policy must support reconciliation with Indigenous peoples – for food sovereignty, for greater access to traditional and country foods, for more treaty resolution and rights to land and water. DC offers extensive, referenced discussion of these issues in DC's Backgrounder on Household Food Insecurity and make specific recommendations in the document [DC position and recommendations addressing household food insecurity](#), Recommendation #2 re: Indigenous peoples & food access, and addresses specific concerns about northern issues in [DC's brief to Nutrition North Canada](#). The Nutrition North Canada (NNC) program must address fundamental health issues and household food insecurity, first and foremost. We note that 'nutritious' or 'healthy' foods for a healthy dietary pattern are not necessarily more expensive in total compared to a diet that is less healthy, but some degree of food literacy will be required.

Canada's Indigenous peoples in particular are not as well-served as they could be through NNC, since the program gives priority to subsidy of store-bought foods, not traditional or country food access. As well, we (DC) do not necessarily agree that a food supply must be 'fresh' year-round, as implied in the underlying principles of the current Nutrition North Canada subsidy program. The current retail subsidy does not equitably address food insecurity since it is a general subsidy to which all households, regardless of income, have access, provided they live in designated communities. We note this view about NNC has been shared by Food Secure Canada in their submission on Food

¹⁰ Alberta Health Services. The affordability of healthy eating in Alberta 2015. 2017. Available from <http://www.albertahealthservices.ca/assets/info/nutrition/if-nfs-affordability-of-healthy-eating.pdf>

Policy. Support for more local and regional food production and processing may improve community food security and access to fresh foods in communities even more than the current NNC program. Facilitating strategies to provide incentives and disincentives for reduced food waste across the food chain will also be important. Given some strategies proposed by various groups however, DC urges businesses to be particularly sensitive to the capacity of food charities for handling excess food or potential food waste, and to only donate healthy foods or at least give food banks the option to turn away offers of less healthy foods.

How do we work with global partners? Considering the last point in Theme 1, we raise some questions about Canada's responsibility to global partners. "Working with partners to improve access to nutritious foods around the world" in an international development approach most often concentrates on sharing ideas, research and technology, but not necessarily supplying food. Trade is however important to increase the variety of foods available to Canadians. The question remains however, How much food should Canada produce for export while also supporting global efforts to develop and support more resilient local food economies?

THEME 2: IMPROVING HEALTH, NUTRITION AND FOOD SAFETY

Increasing Canadians' ability to make healthy and safe food choices.

Canada's world-class food safety system continues to provide its citizens with safe food to eat. Additional efforts to promote healthy living through nutritious and safe food choices, can improve the overall health of Canadians, while lowering health care costs.

- Ensuring that food in Canada is as safe as possible.
 - Preventing and reducing obesity and chronic diseases.
 - Making healthier food more available for Canadians.
 - Preventing food products with misleading labels or deliberately altered content from entering the market.
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DC's response to Theme 2:

DC understands this theme to be primarily about **health – nutrition and food safety**, while ensuring a variety of personally and culturally acceptable foods available to residents. The title of this theme could be more specific – e.g., "*increasing the proportion of healthy nutritious foods and maintaining high standards of food safety within the food supply*". This theme will contribute directly to the health of Canada's human population and decreased prevalence of diet-related diseases, with concomitant decreases in direct and indirect cost externalities to healthcare systems and quality of life across Canada.

Healthy Eating Strategy for Canada and A Food Policy for Canada must be complementary: Health Canada's suite of policies within its Healthy Eating Strategy are a direct response to their mandate to introduce new regulations to improve the food supply and improve food labels, as well as to introduce new restrictions on the commercial marketing of unhealthy food and beverages to children, to protect children from influential marketing practices. Health Canada recently completed an [Evidence Review for Dietary Guidance: Summary of Results and Implications for Canada's Food Guide](#), which specifically affirmed conclusive evidence for relationships between sodium and increased risk of high blood pressure, trans fatty acids and increased risk for cardiovascular disease, and dietary patterns associated with positive cardiovascular disease outcomes - characterized by higher consumption of vegetables, fruits, whole grains, low-fat dairy, and seafood, lower consumption of red and processed meats, refined grains, and sugar-sweetened foods and beverages. The Evidence Review was followed by [proposed new Dietary Guidance and revisions for Canada's Food Guide](#), emphasizing health promotion and disease prevention, and including environmental considerations. To date, Health Canada has made the following *recommendations within three proposed Guiding Principles*: (1) 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. (2) limited intake of processed or prepared foods high in sodium, sugars or saturated fat; avoidance of processed or prepared beverages high in sugars, and (3) selecting nutritious foods when shopping or eating; planning and preparing healthy meals and snacks; sharing meals with family and

friends whenever possible. Furthermore, *environment considerations* are proposed to include the way our food is produced, processed, distributed, and consumed, including the losses and waste of food; address greenhouse gas emissions, soil degradation, decreases in water quality and availability, and wildlife loss. These elements are all in keeping with other definitions for sustainable, healthy diets. In the United Kingdom, the Food Climate Research Network defines a sustainable diet¹¹ as one that: provides diversity, balanced energy/energy density, emphasizes minimally processed plant-based diet, includes animal foods in moderation (as excellent sources of protein and micronutrients), very limited consumption of foods low in micronutrients and high in fat, sugar or salt, includes healthy oils and fats, includes tap water, and less requiring of rapid and more energy-intensive transport modes. Another, very simple definition for a sustainable diet is “one that optimises good sound food quality, health, environment, socio-cultural values, economy and governance”¹².

The [Health Canada proposal for front of package \(FOP\) labelling](#) speaks to the greater risk of diet-related diseases and challenges of moderating the availability of foods high in nutrients of public health concern. There is potential here to help consumers better appreciate which food choices are high in sodium, sugars and/or saturated fat, to encourage them to check for other products with healthier formulations of similar products and/or to balance their daily food choices with foods that are not marked high in these nutrients. There is great need to help consumers better understand the composition of their food choices and make changes in their dietary habits. This will be further assisted by reformulation of food products, to decrease these excessive levels of added sodium, sugars and saturated fats in foods and improve variety in healthy food environments.

Safe food and healthy/nutritious food are *different* concepts, equally important: Both concepts are critical and have substantial impact on human health and healthcare costs. While many foods with low nutrient density are ‘safe’ (i.e., low risk of bacterial contamination and foodborne illness), some of the healthiest, foundational foods in a nutrient-rich diet require careful handling and storage to minimize risk of decay and bacterial growth. Other food safety issues related to safe production and processing of food can include overuse of antimicrobials/antibiotics (contributing to increased antibiotic resistance), addition of more food additives (to extend shelf life), additional costs related to food handling, more food waste throughout the food chain, food fraud, mistaken or missing allergen labelling.

The more immediate and urgent risks of food safety, especially prevention of foodborne illnesses, are often prioritized within the agriculture sector and food-processing industry. Approximately one in eight Canadians experience an episode of domestically acquired foodborne illness each year in Canada¹³, and the prevalence is even greater among some Indigenous populations¹⁴. However, we note that the prevalence of diet-related chronic diseases is even higher than foodborne illness – while the onset may not be as dramatic as for foodborne illness, the impacts are great and more costly in the long term. The prevalence of diabetes and pre-diabetes is double that of foodborne illness – affecting one in four Canadians.

In the [Canada Gazette 2 amendments to the Food & Drugs Act for Nutrition Labelling and other provisions](#), the cost-benefit analysis described by Health Canada included an examination of health outcomes and health spending for

¹¹ Garnett T. What is a Sustainable Diet? A Discussion Paper. Oxford: Food & Climate Research Network, Oxford Martin School, University of Oxford, 2014:13.

¹² Mason P, Lang T. Sustainable Diets: How Ecological Nutrition Can Transform Consumption and the Food System. Routledge, 2017. ISBN-13: 978-0415744720.

¹³ Thomas MK, Murray R, Flockhart L, Pintar K, Pollari F, Fazil A, et al. Estimates of the burden of foodborne illness in Canada for specified pathogens and unspecified agents, circa 2006. Foodborne Pathog Dis. 2013; 10 (7): 639-48

¹⁴ Andermann A. Outbreaks in the age of syndemics: New insights for improving Indigenous health. Can Commun Dis Rep. 2017;43(6):125-32.

five different chronic diseases that were most linked to diet and nutrition (“cardiovascular disease, malignant neoplasms, diabetes mellitus, nutritional deficiency and musculoskeletal disease”). The five diet-related diseases were estimated to account for *\$26 billion annually in direct and indirect health expenses*, whereas food manufacturing firms (directly affected by the food labelling amendments, representing almost \$88 billion in yearly revenues), provide an injection of *\$21 billion into the Canadian economy*. Clearly, there is need to consider how best to support continued contributions of food processing and manufacturing companies to Canada’s economy, *while also reducing the cost to human health and publicly funded health care due to diet-related disease*. Agriculture and the agri-food system (input and service suppliers, primary producers, food and beverage processors, food retailers and wholesalers, and foodservice providers) are cited to generated over \$100 billion revenue (\$108.1 billion in 2014), accounting for 6.6% of Canada’s gross domestic product (GDP).¹⁵

The health risks related to deficits in food safety (presence of bacteria, unmarked allergens etc) and risks related to high levels of nutrients of public health concern in foods (associated with diet-related diseases) must be considered as *equally important* to economic endpoints. The outcomes of consuming unsafe foods and unhealthy foods can be quite similar: serious risk of illness and premature death, high costs within the healthcare system for treatment and management of diseases. The prevalence of diet-related diseases contributes to greater direct and indirect costs in the long term for the healthcare system and human wellbeing, while the costs incurred with food safety issues may be more directly (but not entirely) borne by the food processing industry and food services, e.g., preventive measures, food recalls, loss of trust, decreased sales. The costs to industry for healthier reformulation of products, to decrease the levels of nutrients of public health concern in foods, are worthwhile and responsible investments in society in the long run. While the agri-food industry does not directly bear the cost of diet-related disease related to overconsumption of food products high in nutrients of public health concern, the externalized costs to the healthcare system and human well-being are ultimately a shared cost for society, affecting economics in both the private and public sectors.

Potential impacts of more nutrient fortification of foods on human health: Emerging concerns among dietitians for changes in the food supply are related not only to diet-related diseases, associated with high intakes of nutrients of public health concern, but also changes wherein the food supply now contains more products that are fortified with added nutrients, especially vitamins and minerals. The advent of the newer category of “supplemented foods”, in addition to food vehicles for mandatory fortification and some allowances approved for discretionary fortification, has triggered some concern for excessively high nutrient intakes by some segments of the population. Very high nutrient intakes should also be monitored for their potential long term impacts on health – never before have Canadians had such great access to foods and non-prescription and natural health products (NNHPs) that contain such high levels of added nutrients, levels potentially causing pharmacological effects. There is need to continuously re-evaluate efficacy and safety of food fortification (e.g., the levels of mandatory folate and vitamin D fortification in the food supply are currently under review – folate levels may now be too high overall, there may be need for more or different food vehicles and higher amounts of vitamin D in the food supply to meet needs). DC has written about these concerns in responses to Health Canada consultations on regulatory proposals for the management of [caffeinated energy drinks](#) and [supplemented foods](#), as well as “[self-care products](#)” (NNHPs).

The risk to human health from regular consumption of low nutrient density foods must be reduced – and this is much more efficiently supported by systemic change, making more nutritious foods available in the food supply and encouraging greater consumption through healthy food environments, where it’s easier to make healthy choices. A greater emphasis in food policy direction should be aimed at providing more ‘healthy’, minimally processed foods and

¹⁵ Agriculture & Agri-food Canada. An Overview of the Canadian Agriculture and Agri-Food System 2016. <http://www.agr.gc.ca/eng/about-us/publications/economic-publications/an-overview-of-the-canadian-agriculture-and-agri-food-system-2016/?id=1462288050282#a2>

food products within the food supply, while also addressing food safety concerns through innovative food science research and adjusting consumer expectations for extra-long shelf life. Certainly, individual consumers need to improve their food literacy with respect to safe food handling and proper storage; *however*, there is also a collective social responsibility for all food system actors to provide healthy food environments where consumers can make healthy choices more easily wherever they work, learn, play and live. There is room here for more innovation within the food industry and more attention paid to food labelling, nutrient content and food fraud by the Canadian Food Inspection Agency (CFIA), and provincial/municipal inspectors, to demonstrate greater priority for overall nutritional quality of the food supply. Dietitians champion both food safety and ample variety of nutrient-rich, accurately labelled foods as key elements of a healthy food supply, which should in turn be made accessible to Canadians throughout their food environments (including retail stores, restaurants, markets, schools, workplace cafeterias, public facilities etc).

More diligent enforcement of food labelling regulations and proactive actions are needed to monitor nutrient composition of foods, check for food contaminants and food fraud are also needed in Canada. Continuous monitoring of the ingredients in and nutrient composition of food products is essential to track the impacts of common industry practices on long-term safety and sustainability of the food supply as produced in Canada. Such monitoring will require commitment from the CFIA and other provincial/municipal inspectorates, with sufficient resources, including inspectors on the ground. If the capacity of the federal/provincial food inspection is insufficient, inspectorate resources and training must be brought up to capacity before the food system can further expand in outputs.

How can and will the agriculture and agri-food sectors be supported and incentivized to produce healthier food products for sustainable diets, as a net positive economic contribution to Canada's GDP? This question is critical to the global and domestic shift needed to protect the environment and decrease the current costs and collateral damage to the health and wellbeing of our population – and it relates specifically to A Food Policy for Canada in this health and safety theme. Health Canada has included an emphasis on more plant-based foods and plant-based sources of protein and fewer sugary drinks, as part of the Guiding Principles in proposed new Dietary Guidance. The high cost of diet-related disease in Canada is borne by a healthcare system that is overburdened and for which there is no more funding; Canada's population is impacted as a workforce and in its quality of life. These costs must be accounted for in the total net contribution of agriculture and the agri-food industry to GDP. The simple comparison above (\$26 Billion/yr for diet-related disease vs \$21 Billion/yr injection from food industry) suggests that the net contribution to GDP from the agri-food industry is *less* than the cost to society for diet-related disease.

While consumers certainly have an individual responsibility to choose for and protect their own health, our food environment must support consumers in this direction – and help to “pay” for this externality by contributing to a reduced incidence of diet-related disease. If the agri-food industry invested more in reformulation and produced healthier, more nutrient-dense food products overall, what would the economic impact be? Product reformulation is already happening. To what degree could savings or cost recovery within Canada's health care system be realized through reduction in the prevalence of diet-related diseases? A healthier food supply and healthy food environments are critical. Actions supported by many health organizations include investment in infrastructure for producing healthier foods (e.g., flash freezing plants for produce), taxation of foods that are less healthy, e.g. sugary beverage tax: Taxation and Sugar-Sweetened Beverages: Position of Dietitians of Canada, subsidy for more healthy foods to increase availability and affordability, restricted marketing directed to children (DC is part of the Marketing to Kids Coalition, in support of the Ottawa Principles and initial steps proposed by Health Canada <http://stopmarketingtokids.ca/>), and encouragement of provincial and local government actions, such as setting and enforcing standards for foods sold in schools and community centres, incentivising healthy food retailers to enter low income areas, and regulating to prevent the positioning of unhealthy food environments (e.g., some fast food outlets, corner stores) near places where children gather. There is also increasing interest in the role of institutional and food service procurement to support markets for local food and promote economic security within regions. Such actions could leverage greater impacts of public and private funding, to support local farmers/fishers, to increase access to both traditional and locally grown foods in places like hospitals, municipal buildings, schools, university/college campuses and restaurants.

How can the agriculture and agri-food sectors contribute to improved food access and health of Canada's Indigenous peoples? DC has noted above, in Theme 1, the need to promote better access to traditional and country foods for Indigenous peoples. Here too, there are challenges related to the current food system – the need for environmental protection for diminishing stocks of wild foods, animals and fish, protection of water to ensure lower (safe) levels of heavy metals in fish stock (which currently limits fish consumption in many Indigenous communities), support for butchering and inspection facilities to make it easier to purchase these foods. Indigenous peoples and communities must be supported to have greater access to their lands and waters and the food they traditionally acquire. We note too that changes are needed and planned for with respect to future versions of Indigenous Food Guides in Canada – here again, Indigenous dietitians and traditional healers and their communities must be integrally involved in producing this dietary guidance. The incidence of diet-related disease, particularly diabetes, is much higher amongst Indigenous communities – more work is required to address the causes and contribute to reduced prevalence.

As governments (federal/provincial/territorial) seek to modernize their approaches to managing food safety and risk assessment in food processing plants, it is especially important to consider how regulation and enforcement will affect small and medium size enterprises, to minimize costs and barriers that may be more difficult for these businesses to manage and inadvertently discourage new start-ups (which may be particularly important as part of a vibrant local food system). As well, there must be sensitivity in how land and water access is negotiated with Indigenous peoples, where there may be conflicting priorities, e.g., tradition of catching and eating fish vs limiting fish consumption due to known presence of high levels of heavy metal contamination.

Supporting consumers, improving food literacy: While food system environmental supports are necessary, change in dietary habits also requires supports for individuals who are challenged to make better choices. Improved food literacy would include better knowledge of food safety and how to avoid foodborne illness, as well as choosing and preparing healthy foods. Food literacy must be promoted – it could begin by re-introducing food literacy education in elementary or high schools – core curriculum for life skills. Furthermore, DC has explored with AAFC options to launch a pan-Canadian Food and Nutrition Contact Centre, to support Canadians in their food choices and food literacy. Coordinated inter-governmental (interdepartmental and at all federal/provincial/territorial/municipal levels) support for food and nutrition education is needed, including awareness raising campaigns to help consumers understand issues of food policy and health, promotion of food literacy and opportunities to formally gain food literacy.

THEME 3: CONSERVING OUR SOIL, WATER, AND AIR

Using environmentally sustainable practices to ensure Canadians have a long-term, reliable, and abundant supply of food.

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, soil degradation, water quality and availability, and wildlife loss. While much is being done to conserve our natural resources, further opportunities exist to do more.

- Reducing greenhouse gas emissions produced by Canada's agriculture and food industry.
- Conserving our water, air, soil and biodiversity to ensure that Canada can continue to produce safe and healthy food.
- Making it easier for consumers to identify food that is consistent with their values (e.g., fair trade, animal welfare, environmental stewardship of natural resources, protection of habitat and biodiversity) through product labelling.
- Reducing the amount of food wasted in Canada

DC's response to Theme 3:

Commitment to environmental sustainability of the food supply is critical for A Food Policy for Canada. DC considers this theme to be an emphasis on **environmental sustainability**. Without a healthy environment (including soil, water, air, biodiversity), our ability to grow food is severely limited. DC supports continued emphasis on environmental sustainability throughout the development of A Food Policy for Canada. We suggest the wording in Theme 3 could be stronger if the tagline specified having an abundant supply of *nutritious and safe* foods. As well, the full impacts

along the value chain would be more accurate if it included ‘the way our food is produced *and harvested*, processed, distributed, *prepared, stored*, and consumed’.

Dietitians are taking an active leadership role in food system advocacy, education and governance, guided by current evidence on food in a sustainable society. DC has prioritized ‘sustainable food systems that promote healthy diets’ within our strategic priorities. This is a topic that many dietitians care about and seek to provide information to their clientele. DC supports the environmental sustainability themes proposed by AAFC in this consultation. However, we would caution that true sustainability must be considered in a greater context – *ecological* (climate stability, water and soil integrity, animal welfare); *social* (food justice, security, sovereignty, literacy, and culture, and trust); *human health* (nutrition and well-being); and *economically sustainable food system infrastructure* (with food policy governance, and healthy food environments).

The following is a list of concerns and actions related to environmental sustainability, collected from DC members, in response to DC’s internal consultation in July 2017. DC members spoke both to their own questions and concerns, as well as those of their clientele. Dietitians are a unique group within civil society – we are consumers with varying interest in and appreciation for some sectors within the food system, and we are regulated health professionals, experts in food and nutrition, with some expertise in factors related to environmental sustainability, with extensive exposure to questions from the general public as part of our day-to-day practice. The following list represents these diverse views or perspectives, and are not necessarily intended to be a “position of DC”, but more so a reflection of civil society interests and recommendations for sustainable food systems and environmental sustainability in general:

- Protection of arable and pasture lands, to preserve the quality and quantity of land area available for agriculture; encourage policy development and implementation to prevent further development and use of land for residential, commercial and transportation uses. (Concern was also raised about the cost of land and pressure from regulations for new farmers entering the profession.)
- More support for sustainable and organic practices as environmental protection. Provide more supports and training opportunities for farmers and fishers to maximize implementation of evidence-based, environmentally sustainable production. Keeping food production as free as possible from environmental contaminants (e.g., heavy metal contamination, pesticide residues).
- Raise awareness among consumers about environmental impacts and resources needed for different crops and animals. Encourage Canadians to eat more plant-based diets, through education campaigns and incentives for food industry innovations. (Concerns and questions raised about how transitions could be facilitated, to encourage gradual shifts within the food supply, protecting farm incomes and farmers, even increasing their share within the food dollar. Recognition that farmers want to farm sustainably, to protect their resources and take pride in their products.)
- Maximize transparency and protect against food monopolization within business and industry. Expression of concern for broadening the base (number and size) of food system actors, to prevent squeeze within certain sectors (e.g., seed and pesticide producers, retailers). Increased interest as consumers in the promotion of seed-saving and conservation of heirloom varieties of plants and animal breeds for their nutritional value, taste and natural resilience to pests and environmental changes. Continued questions about GMO research, monitoring potential impacts on human health and nearby crops (seed drift).
- Making it easier to identify food that is environmentally sustainable (e.g., fair trade, animal welfare, environmental stewardship of natural resources, protection of habitat and biodiversity).
- Reduce food waste across the food supply chain – this is additional cost to environment for lost energy and inputs, resources needed to dispose of waste. Concern for unintended consequences in food waste strategies, such as increased food diversion to food banks, potentially generating more food waste with multiple diversion channels; consider implementing systemic disincentives too – e.g., disposal fees to offset environmental impact costs.
- Regeneration and conservation of freshwater and ocean/marine ecosystems, to improve potential and sustainability of food sources with lowest possible levels of contaminants. (Interest in having more information about sustainably-caught seafood).
- There is recognition that contamination of water, soil and air is also a larger social responsibility, shared by other industries, government departments and civil society/citizens

DC notes the many discussions about environmental sustainability in Canadian scientific literature and particularly in some other countries, where environmental sustainability has been prioritized. As described above, in Theme 2, the proposed Guiding Principles and Considerations for updated/revised Dietary Guidance (Canada's Food Guide (CFG)) include environmental considerations. Within DC, our Association has prioritized support for dietitians to be "key partners in intersectoral dialogue on innovations that support a sustainable food system and promote healthy diets". This work is reflected in our response to Health Canada regarding dietary guidance - [DC response to Health Canada consultation – Dietary Guidance, Part 1](#) (December 2016), which includes a chapter supporting environmental sustainability within Canada's Food Guide. It also draws from other resources¹⁶ that address elements related to sustainable diets, such as the [Ontario Food & Nutrition Strategy](#) (January 2017), which provides evidence-based rationale for the strategy and 25 priority action areas, including 3.10 – 3.14, Environmental Protection – DC contributed to the process in developing this strategy.

THEME 4: GROWING MORE HIGH-QUALITY FOOD

Ensuring Canadian farmers and food processors are able to adapt to changing conditions to provide more safe and healthy food to consumers in Canada and around the world.

Enabling farmers and food processors, large and small, across the country, to grow, will make more high-quality Canadian food available domestically and internationally. Budget 2017 investments clearly recognize the importance of the agriculture and food sector as a driver of economic growth.

- Supporting new farmers to help them establish successful farms.
 - Preserving agricultural land for food production.
 - Helping the agricultural and food sectors (e.g. food processing and fisheries) innovate and adapt to changing production conditions and market demands.
 - Helping businesses increase exports of Canadian food products to meet the growing global demand.
 - Enhancing Canada's reputation as a preferred food supplier worldwide.
-

DC's response to Theme 4:

It would appear Theme 4 is meant to be a focus on "more" production (more volume) of foods, primarily for export and trade, while maintaining a general 'high quality' in food safety, supporting more healthy food choices, within a framework of environmental sustainability. DC considers this theme to be an emphasis on **ensuring sustainable and increased production capacity of the industry, focussing on economic prosperity for producers/ food system actors**, including food production and processing which can contribute to export and trade, in contrast to the more consumer-focussed economic and social issues in Theme 1.

We note that some discussions about food "quality" are more focussed on issues such as the prevention of food adulteration and increasing trust within the food system - we assume these factors to be included within Theme 2 as part of food safety and healthy foods and, to some extent, Theme 3 for environmental sustainability. "Quality" of food could also refer to other contexts that have been assumed but not specifically articulated within A Food Policy for

¹⁶ Other international resources that have informed DC responses include the [UN Sustainable Development Goals](#) (UN, September 2015) and [Plates, pyramids, planet - Developments in national healthy and sustainable dietary guidelines: a state of play assessment](#) (Food & Agriculture Organization of the United Nations (FAO) and The Food Climate Research Network at The University of Oxford, 2016).

Canada – we refer here to quality attributes of a more cultural and personal nature, such as taste, freshness, appearance, seasonality, country of origin¹⁷.

Dietitians view the food system as complex, with persistent challenges for producers and consumers alike. In the AAFC consultation, questions were asked about guiding principles. In a July 2017 survey of DC members, respondents clearly prioritized “evidence-based”, followed by “integrated” and “accountable”. Any improvements to Canada’s food system must be designed in ways that are equitably balanced for all stakeholders, including producers, consumers, and the planet. As stated earlier, DC recommends prioritization of a governance mechanism within A Food Policy for Canada – to provide infrastructure and resources to implement policy direction and decisions, that to contribute to both improved population health and a food system that is environmentally, socially and economically sustainable.

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¹⁷ Mason P, Lang T. Sustainable Diets: How Ecological Nutrition Can Transform Consumption and the Food System. Routledge, 2017. ISBN-13: 978-0415744720.

Appendix A: List of Dietitians of Canada briefs relevant to A Food Policy for Canada

FOOD INSECURITY, SOCIAL ASSISTANCE

Prevalence, Severity and Impact of Household Food Insecurity: A Serious Public Health Issue

(August 2016) a background paper including information about the prevalence, severity and causes of household food insecurity in Canada, with references.

Addressing Household Food Insecurity in Canada: Position Statement and Recommendations from Dietitians of Canada

(August 2016) the Position Statement and Recommendations, addressing the issues related to household food insecurity, with referenced rationale .

Addressing Household Food Insecurity in Canada: Executive Summary

(August 2016) includes the position statement, recommendations and key information from the two larger, referenced documents. [Sommaire en français.](#)

DC response to Poverty Reduction Strategy in Canada

(June 2017) DC submitted a letter to the Hon Jean-Yves Duclos, Minister of Families, Children and Social Development, urging the government to include household food insecurity measurement as a key indicator to monitor success of the Poverty Reduction Strategy. A brief by the Chronic Disease Prevention Alliance of Canada (CDPAC), in which DC is a member, was also attached.

2016 DC (BC) Submission to the Ministry of Social Development and Social Innovation

(May 2016) – The submission recognizes recent income and disability reforms and identifies that it is now timely to increase income and disability assistance rates to provide recipients with enough money to pay for a healthy diet.

Letter and Detailed Response re: Ontario's Food Security Strategy: Submission to Ontario's Poverty Reduction Strategy Office by Dietitians of Canada (Ontario)

(May 2017) As part of Ontario's Poverty Reduction Strategy, the Ontario Ministry of Community & Social Services proposed a [Ontario's First Food Security Strategy](#), DC(ON) submitted a letter outlining key recommendations, with an attached detailed report to explain the recommendations and an appendix with recommended actions.

Addressing Household Food Insecurity within Canada's Poverty Reduction Strategy: Submission to HUMA by Dietitians of Canada

(March 2017) This Dietitians of Canada report was submitted to HUMA (House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities), for their study on poverty reduction strategies. DC's input draws from our Position and Recommendations on Household Food Insecurity. In May 2017 HUMA released a final report (with recommendations), entitled [BREAKING THE CYCLE: A STUDY ON POVERTY REDUCTION](#) - available [here](#).

NUTRITION NORTH CANADA

DC (Yukon, Northwest Territories and Nunavut) submission on the Nutrition North Canada consultation

(November 2016) – Dietitians of Canada (DC) provided these recommendations focused on issues within the scope of the Nutrition North Canada (NNC) program.

DIETARY GUIDANCE

Dietitians of Canada response to Health Canada's consultation on Dietary Guidance/Canada's Food Guide

(August 2017) – Dietitians of Canada (DC) submitted this response to Health Canada, following internal consultation with DC members.

Dietitians of Canada response to Health Canada consultation on Dietary Guidance/revision of Canada's Food Guide

(December 2016) – DC submitted this response to Health Canada's public consultation on-line on Dec 8, 2016, for the first phase of consultation. The focus was on purpose and content of the Dietary Guidance policy report, for which there will be another consultation in 2017.

TAXATION OF SSBs

Taxation and Sugar-Sweetened Beverages: Position of Dietitians of Canada

(February 2016) – Dietitians of Canada has released its position on taxation and sugar-sweetened beverages. Based on moderate quality evidence, it is the position of Dietitians of Canada that an excise tax of at least 10-20% be applied to sugar-sweetened beverages sold in Canada given the negative impact of these products on the health of the population and the viability of taxation as a means to reduce consumption.

MARKETING TO CHILDREN & TEENS

Dietitians of Canada response to Health Canada's consultation on Restricting Marketing to Children

(August 2017) – Dietitians of Canada (DC) submitted this response to Health Canada, following internal consultation with DC members and as one of the twelve non-governmental organizations of the Stop Marketing to Kids Coalition.

The Ottawa Principles from the Stop Marketing to Kids Coalition

(January 2016) – In 2014, nationally-recognized health opinion leaders, health professional and researchers from across Canada came together to develop a consensus position on a set of definitions, scope and principles meant to guide “Marketing to Kids” (M2K) policy-making in Canada.

FOOD LABELLING

Letter to Federal Agriculture and Agri-Food Minister about support for Health Canada Healthy Eating Strategy, including Front of Package Labelling

(June 2017) – As part of the on-going work of Dietitians of Canada in support of Health Canada's Healthy Eating Strategy, and in collaboration with other health professional organizations and NGOs advocating for health promotion and risk reduction for residents of Canada, a letter was sent to Agriculture and Agri-Food Minister, Lawrence MacAulay, summarizing collective support and recommendations about front-of-package labelling. The letter also appeared as an open letter in the June 12, 2017 edition of the Hill Times, to ensure wider readership by MPs across Canada, before Parliament breaks for the summer.

Letter to Federal Health Minister about Front of Package Labelling

(April 2017) A letter was sent to Health Minister Jane Philpott from a group of representatives of health organizations, health professional associations (including Dietitians of Canada) and academics, summarizing collective support and recommendations about front-of-package labelling.

Dietitians of Canada response to Health Canada consultation “Toward Front-of Package Nutrition Labels for Canadians”

(January 2017) – With cross-Canada input from members, DC submitted a response to this public consultation on January 13, 2017. Concerns and questions from DC are highlighted throughout the report – for a new front-of-package labelling system and some new nutrient content claims.

DC response to Canada Gazette 1 – Nutrition Labelling

(September 2015) – DC responded to the proposals for new nutrition labelling regulations.

Letter to Health Minister Ambrose on Nutrition Labelling

(April 2015) – A summary of DC comments from September 2014 and affirmation of priorities for guidance regarding sugar labeling, Daily Values etc.

Dietitians of Canada responds to Health Canada's consultation on proposed changes in Nutrition Labelling

(September 12, 2014) – DC responded to Health Canada with a cover letter, summarizing overarching comments and recommendations and a report, which summarized the results of our online survey advertised to DC members. The online survey included questions and space for narrative comments addressing all five of the documents released by Health Canada: proposed changes in formatting (Nutrition Facts table and Ingredient List), core nutrients, Daily Values, reference amounts and serving sizes.

DC focus groups respond to the Canadian Food Inspection Agency: Food Labelling Modernization Initiative online consultation

(September 2013) – DC submitted a response to the Canadian Food Inspection Agency's (CFIA) online consultation (June – September 2013) regarding CFIA's Food Labelling Modernization Initiative. The consultation was designed to assess how the CFIA's approach to labels could best provide consumers with necessary, meaningful information and to examine changes needed for the food industry.

NUTRIENT SUPPLEMENTATION AND FOOD FORTIFICATION

DC's response to Health Canada's proposed approach to "Supplemented Foods"

(August 2014) - Health Canada released "Category Specific Guidance for Temporary Marketing Authorization: Beverages, Beverage Mixes and Concentrates, Powders, Bars and Confectionaries – Draft document" in June 2014, calling for comments. Dietitians of Canada (DC) surveyed DC members and DC's Regulatory Affairs Advisory Group reviewed this input to shape the response from DC. This category of "supplemented foods" includes all food-like products transitioned from the Natural Health Products Directorate and now sold under temporary marketing authorization.

Letter to Health Minister Ambrose on Vitamin D

(February 2015) - Dietitians of Canada expresses concern that consumers may be confused about advertising that recommends high dose vitamin D and emphasizes need for evidence-based dietary recommendations for Canadians.

Dietitians of Canada response to NNHP consultation on Self-Care Products

(November 2016) - DC submitted a brief to the Natural and Non-Prescription Health Products Directorate in response to their public consultation on a new proposal for regulation of “self-care products”. The DC response focussed on the proposed “lower

risk” classification for many vitamin and mineral products, expressing concern that there would be no Health Canada review or licensing.

DC response to updated Health Canada guidance on caffeinated energy drinks

(June 2013) – DC responded to Health Canada’s consultation regarding an updated draft guidance document, following up on an earlier version of category-specific guidance on caffeinated energy drinks published in March 2012.

FOOD INSPECTION

Dietitians of Canada response to CFIA consultation on Inspection Modernization and Risk Analysis

(November 2014) – Comments focus on recognizing the unique contributions of health organizations/NGOs and impacts/risks related to food composition and labelling.

DC response to CFIA consultation: Food Labelling Modernization Initiative: Engaging on Key Proposals to Modernize the Food Labelling System

(March 2017) This report includes the embedded CFIA discussion paper and text for CFIA’s on-line questionnaire, with all responses provided by Dietitians of Canada (DC) about issues including Date Marking Requirements, Legibility and Placement of Information, Origin of Imported Food, Key Ingredient Claims, Ingredient List Improvements, Food Compositional Standards.

FOOD SUPPLY & COMPOSITION

Letter to Prime Minister of Canada re Sodium Reduction

(January 2012) – Eighteen health organizations, including DC, collaborated to send a letter to Canada’s Prime Minister requesting national leadership and commitment for sodium reduction in the food supply.

Prohibiting the Use of Partially Hydrogenated Oils (PHOs) in Foods – DC response to Health Canada Notice of Proposal

(June 2017) – DC responded to the federal government’s proposal for regulation that would effectively ban industrial trans fats from foods in Canada. The primary feedback was very positive, with questions raised about monitoring, enforcement and newer industrial fats that may be substituted in future.

Dietitians of Canada response to Health Canada consultation “Toward the Prohibition of Partially Hydrogenated Oils in the Canadian Food Supply”

(January 2017) – With cross-Canada input from members, DC submitted a response to this public consultation on December 13, 2016. Feedback from DC was generally positive, with questions highlighted throughout the response.

AGRICULTURE & AGRI-FOOD; FOOD WASTE

DC Ontario collaborates with OPHA, OSNPPH and PROOF to highlight food insecurity issues in the Ontario government

(August 2017) DC Ontario collaborated with OPHA, OSNPPH and PROOF on recommendations to highlight food insecurity issues in the government of Ontario’s Food and Organic Waste framework

Dietitians of Canada response to Growing Forward 2 (Phase 1) consultation (July 2016)

(July 2016) – DC response to online survey Agriculture and Agri-food Canada, for preliminary input to the next agriculture framework in 2018.

DC responds to Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) Farms Forever initiative

(June 2017) – DC submitted a letter to the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) on their Farms Forever initiative.

2016 Northern Ontario Agrifood Strategy: DC Response

(July 2016) – DC Ontario contributed to development of the Ministry of Agriculture, Food and Rural Affairs’ discussion document by emphasizing the need for a health lens and consideration of food security issues.

DC Response to Yukon Local Food Strategy

(October 2015) – Dietitians of Canada provided this written submission to the Government of Yukon in response to the public consultation on its *Draft Local Food Strategy – Encouraging the Production and Consumption of Yukon-Grown Food*.

DC submits brief to the House of Commons Standing Committee on Agriculture - February 2012

(February 2012) – DC submitted a brief entitled *Meeting Consumer Demands for Healthy Eating: A Call to Action from Dietitians to the House of Commons Standing Committee on Agriculture*.

FOOD LITERACY, EDUCATION

DC Ontario contributes to Education Well-being Strategy

(March 2017) – DC’s input highlights the need for evidence-based nutrition curriculum to support food skills and development of food literacy, to support healthy eating habits.

APPENDIX B: Comments re infographics at regional sessions (August/September 2017)

01 Improving Health and Food Safety.pdf

- page 1 – incomplete representation of diet-related diseases (need to include diabetes, CVD, cancers); impacts of diet-related diseases should be represented similar to that of foodborne illnesses - # people affected, hospitalization, deaths; update food consumption patterns information with data from CCHS 2015 (Nutrition Cycle)
- page 2 – first section requires better balance between individual consumer responsibility *and* need for food supply change – healthier food environments, making healthy choices the easy choice, suggest shifting final bullet to section below about food safety; suggest titles could be HEALTHY FOOD, FOOD SAFETY, FOOD FRAUD

02 Increasing Access to Affordable Food.pdf

- page 1 – suggest using data from PROOF for food insecurity prevalence, since Statistics Canada data includes marginal food insecurity with food security, which skews data interpretation; suggest reducing food bank usage information to one section max (e.g., food bank use across Canada)
 - quoting food bank usage suggests food banks can adequately provide food for clientele, when reality is that only about 20% of food insecure people use food banks and food banks can generally only give enough food to last about 10% of time in a given month – food charity is not a sufficient or dignified response; rates of food insecurity in Indigenous households are not comparable
 - different methodologies used to interpret data; spending on food – not an accurate reflection or fair comparison – shows only market food spending (including restaurants?), but the spending does not reflect time and money to hunt and fish and gather country foods, which many Inuit people living in Nunavut would commonly do
- page 2 – section on Domestic food security should be “Household food insecurity in Canada” – discussion of data discrepancies available in DC’s background paper at www.dietitians.ca/foodinsecurity

03 Conserving our Soil, Water and Air.pdf

- page 3 – re: Growing public trust – suggest including material from CAPI: <http://www.capi-icpa.ca/CAFF/CAFF-finalreport-ENG.pdf> - “Developing an agri-food strategy focused on “trust” is a potentially powerful strategic driver.” (p4) “...“Trust,” when broadly considered, is a lens to clarify important choices facing Canada’s agri-food sector going forward...” (p8)

04 Growing More High Quality Food.pdf

- page 2 – in the section about supplying safe and healthy food, the third and fourth bullet points should be changed to reflect policy commitment to sustainable food system per Theme 3 – people are living longer but the real increase in demand for healthier food products (not just products with health-related attributes) should be noted as a concern about rising rates of diet-related disease
 - the note about consumer preferences changing with rising incomes suggests this is a business opportunity but shifting diets to more dairy and meat is counter to current dietary guidance and environmental sustainability – the opportunities in this theme must respect the considerations in previous themes