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Food Processors of Canada

November 8, 2018

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
House of Commons
Ottawa, ON, Canada, K1A 0A6

Subject: Front of Package Labelling Initiative

Dear Prime Minister:

As representatives from agriculture and agri-food and business leaders from across Canada, we proudly represent the farmers, retailers, manufacturers, and exporters who employ 2.1 million people and account for 6.7% of GDP, while providing Canadians with a wide variety of high quality, safe foods.

We strongly support your government's support for this sector and your commitment to evidence-based policy and legislation. This is why it is crucial that the debate around the Healthy Eating Strategy, and its effectiveness, be grounded in science. Our members give a priority to providing clear, fact-based nutrition information to Canadians and promoting healthy lifestyles in our workplaces and communities. Chronic disease rates are too high, and Canadians deserve clear information, where and when they need it to make smart choices.

We want to work collaboratively with Health Canada on the Healthy Eating Strategy, and, in particular, on a front-of-package nutrition labelling (FOPL) system that builds on the approaches of our trading partners and that will promote a healthier population. We are concerned that Health Canada is pressing ahead on FOPL policy in a manner that falls short of your commitment to ensure that government policy is evidence-based. The result may be a less effective strategy that also causes inadvertent damage to the very economic growth your government is otherwise working so hard to support.

We ask you to consider these facts:

- We have invested millions of dollars and contributed to Health Canada's Nutrition Facts table (NFT) consumer education campaign that has already demonstrated positive results. Statistics Canada says that the NFT is the preferred source of nutritional information for Canadians.
- Research has not demonstrated an association between FOPL and a reduction of chronic disease. In fact, data emerging from Chile, the model for FOPL, shows its introduction has not translated into widespread changes to consumer purchasing behaviour and improved health outcomes.
- Health Canada's proposed go-it-alone approach to FOPL labelling will create a new non-tariff barrier to agri-food trade. Instead, Canada should work with its international partners to develop a unified labelling system that will support better public health, both here in Canada and around the world.

- Your government's own Agri-Food Economic Strategy Table recommended exploring alternative pathways to FOPL that leverages the agri-food sector's experience reducing trans fats without resorting to strict labelling and warnings on food packages.

We are deeply concerned by the lack of evidence currently underpinning this initiative. We worry that Health Canada will create another regulatory hurdle for an already over-regulated industry and cause serious negative consequences for one of Canada's most vital economic sectors. We encourage you to ensure that the ongoing development of the Healthy Eating Strategy honours your government's commitment to respect evidence and engage in meaningful, open-minded consultations with stakeholders.

Sincerely,



Hon. Perrin Beatty
President and CEO
Canadian Chamber of Commerce



Denise Allen
President and CEO
Food Processors of Canada