

**NUTRITIOUS DAIRY**

Dairy products have long been recognized as an important part of a balanced diet and are associated with bone health and reduced risk of heart disease, hypertension, stroke, type 2 diabetes and colorectal cancer.

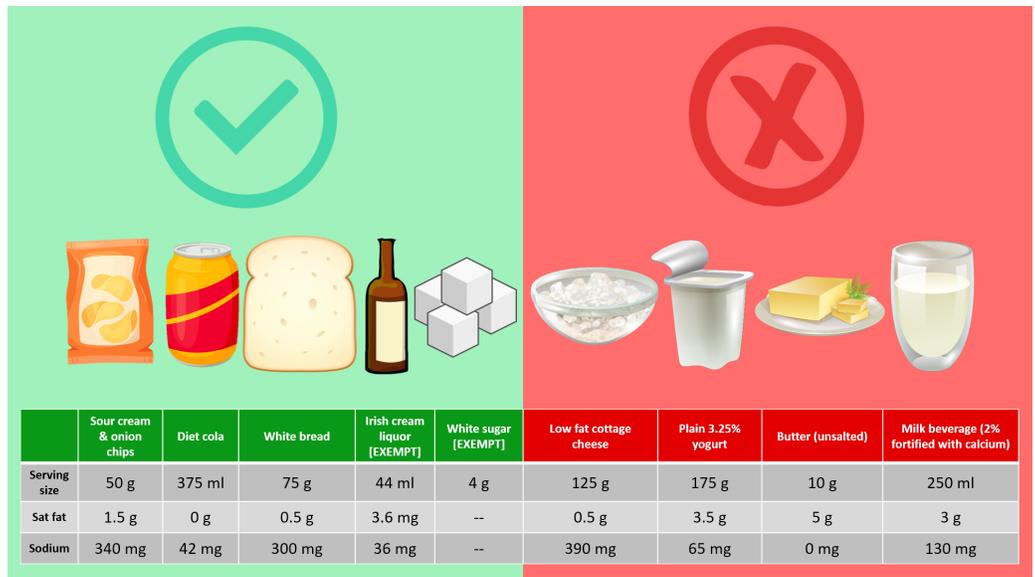
They are also high in nutrients that Health Canada itself has acknowledge that Canadians aren't getting enough of, including: vitamins A and D, calcium, magnesium, zinc and potassium.<sup>1</sup> So why is Health Canada proposing regulations that could see many dairy products carrying what is, effectively, a front-of-package warning label that will deter Canadians from eating them?

Will our children's lunch boxes include diet pops and chips instead of cheese, fruit puree and drinkable yogurt?

<sup>1</sup> Health Canada. *Evidence review for dietary guidance: Summary of results and implications for Canada's Food Guide. 2016.*  
<sup>2</sup> Calculations by Dairy Farmers of Canada. 2018.

**Health Canada's Proposal**

The proposed regulations would impose front-of-package warning labels on products deemed high in sugar, sodium, and saturated fat. This ignores the fact that foods are a complex matrix of nutrients that work together in a multitude of ways to influence health outcomes. When in practice, the proposed regulations, have the potential to discourage the consumption of nutritious products, and encourage the consumption of nutrient-poor discretionary foods.



**The best of intentions don't always make for good policy**

While it may not be Health Canada's intention to discourage Canadians from consuming dairy products, this will be the result of the proposed regulations. It is estimated that the proposed front-of-package nutrition labelling regulations will affect approximately 37,600 stock keeping units (SKUs). Dairy products will account for over 50% of these SKUs (approximately 19,269). As the regulations currently stand, 89% of all dairy products will be required to carry these front-of-package warning labels.<sup>2</sup>

The focus on just three nutrients is an oversimplification of what makes a product "healthy" and doesn't provide Canadians with the information needed to make informed food choices. Earlier this year, a poll conducted by the Dairy Farmers of Canada indicated that 1/3 of Canadians would simply avoid products carrying a warning label.

## CANADA SHOULD LEARN FROM OTHERS

The Government of Canada has stated its commitment to evidence-based policy making. However, as there are very few examples of this type of labelling scheme being used internationally, there is very little evidence to support its implementation in Canada. Currently, the Codex Committee on Food Labelling has struck a working group to develop guidelines to assist governments considering the use of front-of-package nutrition labels. This group, composed of world-renowned experts in the field of nutrition and food labelling, will publish its final report in early 2019. Canada should learn from the mistakes and successes of others before rushing into a well-intentioned, but ill-conceived regulatory scheme.

<sup>3</sup> de Souza, RJ, et al. Intake of saturated and trans unsaturated fatty acids and risk of all cause mortality, cardiovascular disease, and type 2 diabetes: systematic review and meta-analysis of observational studies. (2015). *British Medical Journal*, 351:h3978. Retrieved from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4532752/>

<sup>4</sup> Institute of Medicine (2013). *Sodium Intake in Populations: Assessment of Evidence*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/18311>.

<sup>5</sup> World Health Organization. (2015). *Guideline: Sugars intake for adults and children*. Retrieved from WHO website: [http://apps.who.int/iris/bitstream/handle/10665/149782/9789241549028\\_eng.pdf;jsessionid=67409B35CBB436345581E8F9E5E71DE5?sequence=1](http://apps.who.int/iris/bitstream/handle/10665/149782/9789241549028_eng.pdf;jsessionid=67409B35CBB436345581E8F9E5E71DE5?sequence=1)



Dairy Processors Association of Canada  
Association des transformateurs laitiers du Canada

Indeed, the regulations proposed by Health Canada aim to improve Canadians' health by discouraging them from eating products with front-of-package warning labels in favour of products without warnings. But, a simple look at the list of products that will need to carry front-of-package warning labels (and those that will not) raise questions as to whether the proposed regulations will actually improve the health of Canadians. How will replacing fruit purées, cheese and yogurt (all products that will have to carry a front-of-package warning label) with diet pop, beer, and poutine potato chips improve health? (all products that will not have to carry front of package health warning).

Worst, many empty calorie snack foods that would normally need to carry a front-of-package warning label can be reformulated or reformatted to avoid carrying such a label. Despite not providing any positive nutritional benefits, by not carrying a warning label, these products might seem "healthy". This perception could encourage their consumption over wholesome and nutritious dairy products which actually help improve the health of Canadians.

## A better way forward

Health Canada's process, and the resulting proposed regulations, have numerous flaws which warrant a review of evidence and approach. For example, the Chilean example is often touted as Canada's model for the proposed front-of-package nutrition labelling regulations for saturated fat, sugar, and sodium. However, Chilean regulations **focus on added—not naturally occurring—saturated fat, sugar, and sodium** which means that the vast majority of dairy products are exempted. Beyond this, Health Canada has also overlooked a body of evidence, including that related to:

- **Saturated fat:** several meta-analyses commissioned by organizations like the World Health Organization suggests that the consumption of saturated fat does not increase the risk of cardiovascular disease, coronary heart disease, ischemic stroke, or type 2 diabetes.<sup>3</sup>
- **Sodium:** It is important to note that, contrary to many other products, salt performs important food safety functions in cheese, and that Government of Canada regulations require salt to be used in cheesemaking. The Institute of Medicine has noted that studies have, to date, provided insufficient evidence to support reducing sodium intake below 2,300 mg/day. It highlighted that, some evidence suggests a risk of adverse health outcomes associated with sodium intakes between 1,500 to 2,300 mg/day, including: diabetes, kidney disease, or cardiovascular disease.<sup>4</sup>
- **Lactose:** The main sugar present in dairy products is lactose, a naturally-occurring sugar known to have a lower glycemic index than sucrose. In fact, guidelines from the World Health Organization demonstrate no evidence linking naturally occurring or intrinsic sugars with harmful health effects.<sup>5</sup>

## Additional Reading

### SATURATED FAT

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### LACTOSE AND SUGAR

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### SODIUM

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### FRONT OF PACKAGE NUTRITION LABELLING SCHEMES

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