

January 2, 2008

Honorable Tony Clement, MP
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

RE: Federal Approach to the Elimination of Industrial Produced Trans Fats

Dear Minister:

On behalf of the Urban Public Health Network (UPHN), I am writing in regard to the announcement by the Federal Government in June 2007 on the elimination of industrial produced trans fats.

The Urban Public Health Network represents health regions and health departments providing public health services to people living in major urban centres across Canada. As public health organizations we are faced with addressing the effects of escalating rates of obesity and diet-related chronic conditions such as congestive heart failure and diabetes. The UPHN is committed to taking a preventive approach through evidence-based public health practice to protect and promote the health of residents living in the communities we serve, including the most vulnerable. Research has shown that eliminating trans fats is necessary and the experience in Denmark has shown that it is possible.

We applaud the lead of the federal government in launching the *Trans Fat Task Force*. The Task Force report includes a comprehensive evidence review as well as thoughtful recommendations from an expert multi-stakeholder group. The fact that the group was able to achieve a consensus on their recommendations from a diverse stakeholder group is commendable. It has provided a solid base for eliminating trans fats from the diets of Canadians. The report has also proved useful in other jurisdictions such as the City of New York as it has implemented its strategy to reduce trans fats.

We are please that you, as Minister of Health, accepted the recommendations of the *Trans Fat Task Force* in your June 21, 2007 announcement. However, we are concerned that you are calling upon the food industry to adopt voluntarily the limits for trans fats. The Task Force Report clearly outlined that rationale behind the need for a broad national regulatory approach as the best way to protect the nation's health. We have specific concerns about a voluntary approach. These include:

.../2

Honorable Tony Clement
January 2, 2008
Page 2

- Voluntary measures are often not adhered to until legislation comes into place. Canada's past experience with voluntary food labeling is an example.
- A regulatory approach to eliminating trans fats will be more effective than labeling measures and would benefit all Canadians.
- The absence of federal or provincial action has resulted in some communities initiating actions on their own in support of the *Trans Fat Task Force* recommendations. Both Calgary and Toronto have initiated action on trans fats. This means that local resources have to be allocated to initiatives that the Task Force, including industry, indicated are best addressed at the national level.
- The reliance on industry to voluntarily take action results in a patchwork response. Some products will be in compliance while others will not. This will create confusion for both the consumer and the food services operators and food retailers as they try to provide healthy food choices.

Therefore, we urge you to develop regulations during the proposed two year voluntary period to ensure a strong national approach to the elimination of trans fats from the diets of Canadians. This will allow for rapid introduction of regulations after June 2009.

We look forward to working with you on this issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gerry Predy', with a long, sweeping horizontal stroke extending to the right.

Gerry Predy, MD, FRCPC
Urban Public health Network

cc Dr. David Butler Jones