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National Voice Of Cattle Producers

May 30, 2022

Dear Member of Parliament,

RE: Follow up to recent letter regarding Health Canada's proposed front-of-package labelling for ground beef

Earlier this month, we wrote to express our concern with regards to Health Canada's proposed front-ofpackage (FOP) labelling for ground beef. We are writing again to express urgency about this proposed regulation and to implore you to speak with your colleagues at Health Canada and the Prime Minister's Office and urge them to exempt ground beef from damaging and unnecessary front of package warning labels.

As we mentioned in our previous letter, Health Canada's proposed FOP labelling regulations would require ground beef sold at retail to carry a "high in" saturated fat warning label. Canadians consume approximately half of their calories from nutrient-poor ultra-processed foods. By contrast, ground beef is a nutrient-dense protein that contributes iron, zinc, vitamin B12 and other essential nutrients that many Canadians need more of in their diets. FOP labelling of whole, single-ingredient foods, such as ground beef, contradicts the foundational principles of healthy eating and will distract from the real nutrition priority; Canadians need to reduce their consumption of ultra-processed foods.

With the current inflation costs and with food prices continuing to rise, we need to ensure ground beef, as a single-ingredient whole food, continues to be accessible to Canadians. Ground beef is a staple in Canadian households because it is an affordable, nutrient-dense protein that offers so many vulnerable Canadians with essential nutrients. Putting a warning label on ground beef may create further economic and nutritional impacts for consumers.

- 89% of Canadians cook ground beef at home once a month or more, with 31% reporting cooking weekly, and 38% reporting cooking 2-3x per month. This provides Canadians with the nutrients they need at an accessible price-point considering inflation.
- Lean & extra lean ground beef are by far the dominant categories of ground beef consumed at home (60% + 50% respectively reported).
- Beef sales data from Nielson 2020 also supports the popularity of lean & extra lean as the most type of ground beef purchased, representing 71% of the ground beef sold at retail, with the majority being lean (53%). This is under-reported as it does not include Costco sales data, where only lean ground beef is sold.

We know that Canadians rely on this product to feed themselves. We know that reductions in ground beef consumption will make a nominal impact, at best, on Canadians' overall intake of saturated fat while at the same time putting vulnerable populations at risk of increasingly inadequate iron intakes. We know that Canada will be the only jurisdiction in the world placing a health warning label on its ground beef—as mentioned in our previous letter, other countries who have implemented FOP regulations are exempting <u>all</u> single ingredient whole foods.

The last thing we need is another shock to the agri-food supply chain. Will Canada's trading partners react to the only health warning label on ground beef in the world? Approximately 50% of Canada's beef is destined for export markets; a warning symbol is not a positive message to send to our trading partners. Will consumers pivot away from ground beef in the grocery store, only to find a lack or non-existence of affordable, nutrient-dense options? This will have ramifications for the supply chain. Now is not the time to vilify a single-ingredient and readily available food product; especially where the facts do not support it.

The proposed regulations are scheduled to head to Canada Gazette 2 imminently, and we are urgently requesting an exemption for ground beef on the saturated fat content, due to its nutritional value, limited impact on Canadians' saturated fat intake, and to ensure we protect a fragile supply chain.

Please speak to your colleagues. We are worried about this policy as an industry and as Canadian consumers who reach for this product in the grocery store and who want to ensure it remains on the shelves.

Sincerely,

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James Bekkering, Chair National Cattle Feeders Association

Chris White, President & CEO Canadian Meat Council

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Jack Chaffe, President Beef Farmers of Ontario

Trevor Welch, Chair New Brunswick Cattle Producers

Graham Dalziel, President Meat & Poultry Ontario

CC:

- The Right Honourable Justin Trudeau, Prime Minister
- The Honourable Chrystia Freeland, Deputy Prime Minister and Minister of Finance
- The Honourable Jean-Yves Duclos, Minister of Health
- The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food