

May 12, 2022

Dear Member of Parliament,

RE: Health Canada's proposed front-of-package labelling for ground beef

We are writing to express our concern with regards to Health Canada's proposed front-of-package (FOP) labelling for ground beef and are providing additional ramifications to consider before a final decision is made.

Ground beef should be exempt from Health Canada's proposed front-of-package labelling like other nutritious foods, such as single ingredient meat, milk, eggs, vegetables, and fruit. 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 food 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 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.

The signals the Government of Canada provides to its consumers regarding healthy food choices will only be more important as Canadians rebound from a pandemic and navigate legitimate fears regarding food security. Now is not the time to vilify a single-ingredient and readily available food product; especially where the facts do not support it. In addition to the nutritional impact away from a healthy food choice this regulation proposes, we are concerned that FOP comes at a time when inflation and food prices are at an all-time high and food security is a global priority.

We recently shared new evidence with Health Canada which suggests that reductions in ground beef and ground pork consumption will make a nominal impact, at best, on Canadians' overall intake of saturated fat while at the same time putting vulnerable populations (including women and children) at risk of increasingly inadequate iron intakes. Recent studies document inadequate dietary intakes of iron indicating iron is a nutrient of concern among women of child-bearing age. Further, recent analyses show that ground meat is a small contributor to the overall saturated fat Canadians are consuming.

Other countries that have implemented FOP regulations have chosen to exempt all single ingredient whole foods, based on their nutritious value, including ground beef. Health Canada is doing the opposite. **Canada will be the only jurisdiction in the world placing a health warning label on its ground beef.** We are concerned with the potential trade implications and the signal putting a label on ground beef sends to our trading partners. 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.


The proposed regulations are scheduled to head to Canada Gazette 2 late spring, 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 do not create trade implications in an already volatile but tight international market.

We ask that you speak to your colleagues to express your concern as soon as possible to request an exemption for ground beef as a single ingredient whole food, to prevent negative impacts on the economy, environment, trade and food security.

Sincerely,



Reg Schellenberg, President
Canadian Cattlemen's Association



Chris White, President & CEO
Canadian Meat Council



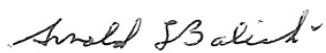
James Bekkering, Chair
National Cattle Feeders Association



Renee Ardill, President
BC Cattlemen's Association



Dr. Melanie Wowk, Chair
Alberta Beef Producers



Arnold Balicki, Chair
Saskatchewan Cattlemen's Association



Tyler Fulton, President
Manitoba Beef Producers



Jack Chaffe, President
Beef Farmers of Ontario



Philippe Alain, Vice-Chairman
Les Producteurs de bovins du Québec



Trevor Welch, Chair
New Brunswick Cattle Producers



Larry Weatherby, Chair
Nova Scotia Cattle Producers

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