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**Recommendations by Conscious Eating Canada for the Proposed Framework for
*A Food Policy for Canada***

The following is respectfully submitted in response to the Canadian government's proposed four themes and their corresponding priorities for *A Food Policy for Canada* on behalf of national nonprofit program Conscious Eating Canada.

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(via email)

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Introduction

The importance of a national food policy that addresses the hurdles of today while strengthening the opportunities of tomorrow is reflected in the mandate letter for the Honourable Lawrence MacAuley, Minister of Agriculture and Agri-Food Canada.

In particular, Prime Minister Trudeau commissioned Minister MacAuley to “develop a food policy that promotes healthy living and safe food by putting more healthy, high-quality food, produced by Canadian ranchers and farmers, on the tables of families across the country.”¹

With that assignment, Prime Minister Trudeau set a great example of leadership and progressive thinking on the complex, systemic, and all-encompassing challenge of ensuring that our food system meets the expectations of Canadians today, and tomorrow.

Conscious Eating Canada would like to thank the Canadian government for the opportunity for all interested parties to participate in consultations to create a food policy that will set a long-term vision for the health, environmental, social, and economic goals related to food while identifying short-term priorities to address pressing issues.

Conscious Eating Canada has so far participated in the consultation process for *A Food Policy for Canada* in two ways: by answering the online survey and by attending the food policy engagement session held in Saint-Hyacinthe on August 16, 2017. We are now pleased to provide feedback through this channel.

In addition, and in keeping with Prime Minister Trudeau’s commitment to making all government “decisions using the best available data,”² Conscious Eating Canada’s approach is science-based. All the information provided herein is supported by reports and peer-reviewed studies. We applaud and agree with Prime Minister Trudeau’s commitment to evidence-based decision making.

For this submission, we provide information in connection with the first three themes around which *A Food Policy for Canada* is built. Within each of these three themes, we highlight the challenges and recommend solutions.

We are pleased with the content of the fourth theme of growing more high-quality food, in particular its recognition of agriculture and the food sector as drivers of economic growth. Accordingly, we have no feedback on this theme.

¹ “Minister of Agriculture and Agri-Food Mandate Letter,” Justin Trudeau, Prime Minister of Canada, n.d., <http://pm.gc.ca/eng/minister-agriculture-and-agri-food-mandate-letter>

² “A New Plan for a Strong Middle Class,” Liberal Party of Canada, 2015, <https://www.liberal.ca/wp-content/uploads/2015/10/A-new-plan-for-a-strong-middle-class-BW-1.pdf>

We also provide important feedback regarding the short-term and long-term goals for this national policy, together with a conclusion.

Themes

Theme 1: Increasing Access to Affordable Food

Challenge

Every year more Canadians, especially from low-income households, struggle to feed themselves and their families.

In its 2016 report *HungerCount*, Food Banks Canada indicated that 863,492 Canadians received food from a food bank, an increase of 28% from 2008. The greatest increase was seen in Alberta, at more than **136%**.³

The Food Banks Canada report explains the increase in demand for its services by pointing to various factors, including insufficient wages and increased cost of housing. But there is another factor to consider: the rising cost of food, especially meat. Originally, the expected price increase for meat in 2017 was 4%–6%, according to the yearly food price report published by Dalhousie University, but that increase was revised to 7%–9% over the summer.⁴⁵

Solution

The government must educate all Canadians on the economic advantages of consuming more plant-based protein.

Plant-based proteins, such as lentils, beans, chickpeas, and tofu, cost considerably less than meat products. Plant-based proteins, in particular pulses, gained international attention when the United Nations declared 2016 the International Year of Pulses. At a ratio of 1:2 or 1:3, the retail price per gram of protein is more affordable for beans, chickpeas, and lentils than for

³ “HungerCount 2016,” Food Banks Canada, 2016, https://www.foodbankscanada.ca/getmedia/6173994f-8a25-40d9-acdf-660a28e40f37/HungerCount_2016_final_singlepage.pdf.aspx?ext=.pdf

⁴ “Canada’s Food Price Report 2017,” Dalhousie University, 2017, <https://www.dal.ca/content/dam/dalhousie/pdf/management/News/News%20&%20Events/21135-Food-Price-Report-Eng-2017-Final.pdf>

⁵ “Canada’s Food Price Report Mid-Year Update,” Dalhousie University, 2017, <https://www.dal.ca/content/dam/dalhousie/pdf/management/News/News%20&%20Events/Food-Price-Mid-Term-Report-final-EN.pdf>

meat, fish, and eggs, according to the protein scorecard developed by the World Resources Institute.⁶

While pulse consumption remains low in Canada, pulses have been named a rising Canadian crop star, with an export value of \$4.4 billion in 2015.⁷ Increasing local consumption could make this valuable sector even more profitable. To help Canadians afford the proteins they need, *A Food Policy for Canada* must include the **promotion of plant-based proteins as affordable and accessible sources of protein**. Not all Canadians are familiar with the cost benefits of introducing pulses into their diets. Providing simple resources, such as comparison charts and cost calculators, to consumers can help them realize the cost-saving potential of plant-based proteins.

Theme 2: Improving Health and Food Safety

Challenge

Too many Canadians are obese and sick, and this is a rising epidemic.

The 2016 report from the Standing Senate Committee on Social Affairs, Science and Technology, could not have been clearer: “There is an obesity crisis in this country. Canadians are paying for it with their wallets—and with their lives.”⁸

With two out of three adults and one out of three children in Canada obese or overweight, the number of Canadians dying every year from complications linked to excess weight is enormous.⁸

Also, almost one out of three adults over age 20 in Canada has been diagnosed with a chronic disease, such as cancer, diabetes, cardiovascular disease, chronic respiratory disease, and mood or anxiety disorder.⁹ In many cases, these diseases can be avoided altogether. According

⁶ “Protein Scorecard,” World Resource Institute, n.d., <http://www.wri.org/resources/data-visualizations/protein-scorecard>.

⁷ “Pulse Potential: Why are Lentils and Beans Rising Canadian Crop Stars,” Agriculture and Agri-Food Canada, 2017, <http://www.agr.gc.ca/eng/about-us/publications/discover-agriculture/pulse-potential-why-are-lentils-and-beans-rising-canadian-crop-stars-/?id=1412020012289>

⁸ “Obesity in Canada: A Whole-of-Society Approach for a Healthier Canada,” The Standing Senate Committee on Social Affairs, Science and Technology, 2016, <https://sencanada.ca/content/sen/committee/421/soci/rms/01mar16/Report-e.htm>

⁹ Betancourt, M., et al., “The 2017 Canadian Chronic Disease Indicators,” Public Health Agency of Canada, 2017, <https://www.canada.ca/content/dam/phac-aspc/documents/services/publications/health-promotion-chronic-disease-prevention-canada-research-policy-practice/vol-37-no-8-2017/ar-03-eng.pdf>

to the World Health Organization, poor nutrition is one of four major modifiable factors for most chronic diseases, as it can lead to hypertension, diabetes, high cholesterol, and obesity.¹⁰

While 84% of Canadians understand that healthy eating is important to one's health, very few perceive their diet to be poor.¹¹ The deluge of information available on healthy eating and nutrition is often contradictory, and depending on the source, unreliable. This is particularly so when the information comes directly from organizations served by it. Marion Nestle, professor in the Department of Nutrition, Food Studies, and Public Health at New York University and prize-winning author of six books on food politics and nutrition, notes that "so much research is sponsored by industry that health professionals and the public may lose confidence in basic dietary advice."¹² It is not surprising, therefore, that Canadians are confused and make less healthy dietary choices.

There is, however, a growing body of reliable literature documenting how eating more plant-based foods can reduce the risk of developing chronic diseases and becoming overweight or obese.

The link between high consumption of meat, especially processed meat, and an increased risk of colorectal cancer has been cited by Health Canada in the *Summary of Evidence Base for Guiding Principles and Recommendations* published to support its latest food guide recommendations.¹³

In a meta-analysis of seven studies with a total of 124,706 participants, the authors concluded that vegetarians had a 29% lower ischemic heart disease mortality than nonvegetarians.¹⁴ According to the American Cancer Society, 30% of all cancers in developed countries are linked to diet and nutrition.¹⁵ Another study by the American Association for Cancer Research, examining the overall cancer incidence among 69,120 participants, found that vegetarians had less gastrointestinal cancer.¹⁶

¹⁰ World Health Organization (2010) Chapter 1: Burden: Mortality, Morbidity and Risk Factors. In: World Health Organization, editors. *Global Status Report on Noncommunicable Diseases*. Geneva: World Health Organization.

¹¹ Schermel, Alyssa et al. "Canadians' Perceptions of Food, Diet, and Health – A National Survey." Ed. Zulfiqar A. Bhutta. *PLoS ONE* 9.1 (2014): e86000. PMC. Web. 30 Aug. 2017.

¹² Nestle, M., "Corporate Funding of Food and Nutrition Research: Science or Marketing?" *JAMA Internal Medicine*, 2015, http://www.foodpolitics.com/wp-content/uploads/JAMAIntMed_Viewpoint_15.pdf

¹³ "Summary of Evidence Base for Guiding Principles and Recommendations," Government of Canada, 2017, <https://www.foodguideconsultation.ca/evidence-base>.

¹⁴ Huang T, Yang B, Zheng J, Li G, Wahlqvist M, L, Li D, "Cardiovascular Disease Mortality and Cancer Incidence in Vegetarians: A Meta-Analysis and Systematic Review," *Ann Nutr Metab* 2012;60:233-240.

¹⁵ American Cancer Society. *Global Cancer Facts and Figures 2nd Edition* [report on the internet] Atlanta (GA): American Cancer Society; 2011. [cited 2012 March 05]; [8089K bytes]. Available from: <http://www.cancer.org/acs/groups/content/@epidemiologysurveillance/documents/document/acspc-027766.pdf>.

¹⁶ Tantamango-Bartley, Yessenia et al., "Vegetarian Diets and the Incidence of Cancer in a Low-Risk Population," *Cancer epidemiology, biomarkers & prevention: a publication of the American Association for*

In 2015 the International Agency for Research on Cancer of the World Health Organization evaluated the carcinogenicity of red and processed meat. Its working group of 22 experts from 10 countries found meat consumption was associated mostly with colorectal cancer but also pancreatic and prostate cancer.¹⁷

There is no doubt, as stated by Dr. Marco Springmann, from the Future of Food project at University of Oxford, that “dietary changes toward fewer animal and more plant-based foods are associated with significant benefits due to reductions in diet-related mortality.”¹⁸

Solution

Canadians require unbiased, science-based information on healthy eating and healthy food choices from their federal government. Accordingly, Canadians should be made aware of the benefits of eating more plant-based foods and reducing their meat consumption to decrease incidences of obesity and other chronic diseases.

One of the priorities for theme 2, in alignment with the recent Health Canada Food Guide recommendations,¹⁹ must be to **increase the consumption of plant-based proteins.**

Theme 3: Conserving Our Soil, Water, and Air

Challenge

The consequences of climate change are already felt by Canadians through more frequent weather events such as floods, droughts, and severe storms.

A 2015 Environics Institute survey found that “Canadians are now expressing increased support, if not expectations, for government leadership and concrete policy actions to address the growing challenge posed by global warming.”²⁰

Cancer Research, cosponsored by the American Society of Preventive Oncology 22.2 (2013): 286–294. PMC. Web. 25 Aug. 2017.

¹⁷ “IARC Monographs evaluate consumption of red meat and processed meat,” International Agency for Research on Cancer of the World Health Organization, 2015, https://www.iarc.fr/en/media-centre/pr/2015/pdfs/pr240_E.pdf

¹⁸ Springmann, M. et al, “Analysis and valuation of the health and climate change cobenefits of dietary change,” PNAS, April 12, 2016, vol. 113, no. 15, 4146–4151

¹⁹ “Guiding Principles,” Government of Canada, 2017, <https://www.foodguideconsultation.ca/guiding-principles-detailed>.

²⁰ “Canadian Public Opinion About Climate Change,” Environics Institute, 2015, <http://www.environicsinstitute.org/uploads/institute-projects/environicsinstitute-dsf%20focus%20canada%202015%20-%20climate%20change%20survey%20-%20final%20report%20-%20english.pdf>

The development of *A Food Policy for Canada* is an opportunity to tackle environmental issues related to our food system. The way our food is produced, transported, packaged, and consumed impacts our environment and contributes to the country's greenhouse gas emissions, the degradation of our soil, the pollution of our waters, and the loss of biodiversity.

We know that not all foods have the same environmental impact. Animal agriculture has the highest impact on our soil, water, and air and generates a large percentage of our greenhouse gases. A 2016 Food and Agriculture Organization study attributed 18% of global greenhouse gas emissions directly to livestock production.²¹ A more recent report from the United States Department of Agriculture places this number even higher, at 30%.²²

Solution

The greatest sustainability improvement will come from focusing on foods that have relatively small environmental impact. Canadians must understand the science-based evidence behind the environmental footprint of all the food products available to them.

Growing and consuming plant-based foods is the most effective approach to improving the sustainability of our food system by reducing our carbon footprint and our water consumption and protecting the quality of our air and soil. Growing plant-based food requires less water, land, and energy²³ than producing meat, poultry, dairy, and eggs. Beef production is particularly resource-intensive, requiring three times the water to produce than the same amount of pulse (beans, lentils, peas).²⁴ Pork and chicken, although less water-intensive than beef, still require more water than pulses.²⁵

The Food and Agriculture Organization of the United Nations even recommends growing pulses to increase resistance to climate change.²⁶

Canadians are already learning to take many small actions each day to be more "green," such as changing to more efficient lightbulbs. But a recent groundbreaking study showed that these small changes are unlikely to meaningfully reduce anthropogenic climate change. Rather, the

²¹ Henning Steinfeld et al., FAO, *Livestock's Long Shadow: Environmental Issues and Options* (2006), available at <http://www.fao.org/docrep/010/a0701e/a0701e00.htm>.

²² USDA, *USDA Climate Change Science Plan 4* (2010), available at http://www.usda.gov/oce/climate_change/science_plan2010/USDA_CCSPan_120810.pdf.

²³ David Pimentel and Marcia Pimentel, "Sustainability of meat-based and plant-based diets and the environment," *Am J Clin Nutr* September 2003, vol. 78 no. 3 660S-663S.

²⁴ Mekonnen, Mesfin M and Arjen Y Hoekstra, "A Global Assessment of the Water Footprint of Farm Animal Products," *Ecosystems* (2012) 15: 401–415 DOI: 10.1007/s10021-011-9517-8

²⁵ *Id.*

²⁶ "Pulses and Climate Change," Food and Agriculture Organization of the United Nations, 2016, <http://www.fao.org/resources/infographics/infographics-details/en/c/454530/>.

study concludes that education and government recommendations to make changes such as adopting a plant-based diet are the most effective climate-change mitigation strategies.²⁷

Accordingly, a priority for theme 3 must be to **encourage the promotion and consumption of plant-based foods, especially plant-based proteins**, as a strategy for reducing the environmental impact of our food system.

Short-Term and Long-Term Goals

We read with great enthusiasm the government's outline of *A Food Policy for Canada*. We share herein additional measures that we are confident will be tremendously beneficial to achieving the important goals set out by the policy committee.

Short-Term Goals

During the food policy engagement session we attended, participants identified “food literacy” as one of the most important and urgent priorities to be addressed by *A Food Policy for Canada*. Food literacy can be about reading labels and ingredients, but it can also be about understanding the impact of our day-to-day choices on our health, the environment, and our ability to feed ourselves and our family within our food budget.

In the short term, public education campaigns on the three themes discussed in this submission will help empower Canadians to understand that we must look at food not only as what we find on our plates but also as a factor in making us sick or keeping us healthy and in increasing or reducing our environmental impact. As new information and studies are published, it becomes difficult for average people to review, analyze, and apply this information to their own decision making. We look to the federal government to play a leadership role in making available science-based and transparent information to enable Canadians to make the best food choices.

Long-Term Goals

Providing Canadians with the knowledge, understanding, and ability to lessen their carbon footprint and improve their health through nutritious food choices is a commendable goal—so long as an adult or a child has the ability to make these healthy food choices in the first place.

There are circumstances in which many Canadians do not have that choice. Whether it's someone purchasing lunch from a school or workplace cafeteria or someone in the care of our public institutions, such as hospitals, long-term care facilities, and even prisons, healthy and sustainable plant-based foods are not always readily available. In remote communities, this challenge is even more pervasive.

²⁷ Seth Wynes, Kimberly A Nicholas. “The climate mitigation gap: education and government recommendations miss the most effective individual actions,” *Environmental Research Letters*, 2017; 12 (7): 074024 DOI: 10.1088/1748-9326/aa7541.

A Food Policy for Canada must include guidelines to ensure that, in the long term, all Canadians, no matter where they live, have access to healthy and sustainable food choices within our public institutions at both the federal and provincial levels.

When public health campaigns are launched across the country, our public institutions are often the first to implement guidelines. In the short term, once *A Food Policy for Canada* is launched, we encourage the federal government to turn to the public institutions for help in implementing the guidelines and reaching more Canadians from the start.

Conclusion

It is an exciting time when a country embarks on a comprehensive exercise to gather stakeholders around the common goal of developing a better food system for its citizens, today and for generations to come. The development of *A Food Policy for Canada*, through a transparent and open process, has the potential to change the relationship that Canadians have with their food and the food industry.

It is important, however, that a food policy focus on priorities that have the most potential to help Canadians afford their food, improve their health through better food choices, and contribute to reducing our country's environmental footprint. The evaluation of the potential of these solutions, information, and programs presented to Canadians must be evidence-based, relying on the latest and most comprehensive scientific studies.

At the same time, a food policy must include programs that provide the necessary tools and knowledge for ordinary Canadians to make healthy and sustainable food choices, even setting forth new alternatives that address the social, environmental, and financial impacts of food production in Canada.

Canada has the potential to position itself as a true leader in food policies and programs that address our most pressing health, sustainability, and economic issues.

We welcome any further opportunities to consult with the Canadian government on establishing a national food policy. And we thank you, once again, for this opportunity to contribute to the development of the forward-thinking, collaborative, and evidence-based initiative that is *A Food Policy for Canada*.

About Conscious Eating Canada

Conscious Eating Canada is a nonprofit program dedicated to helping foodservice professionals in public institutions integrate healthy and sustainable foods into their menus. This is done by replacing 20% of the meat on the menu with delicious plant-based proteins, such as legumes and whole grains. Our approach makes healthy and sustainable eating more affordable.

We provide a variety of services and tools to support the change, including menu consultations, presentations, and marketing and communications materials. We build on the experience of other organizations and countries that have successfully transitioned to more healthy plant-based menu items. Around the world, school districts, including the Vancouver School District here in Canada, and universities, hospitals, and other institutions, are implementing measures to make more plant-based foods available on their menus.

Conscious Eating Canada is a national member of Food Secure Canada, a pan-Canadian alliance of organizations and individuals working together to advance food security and food sovereignty through three interlocking goals: zero hunger, healthy and safe food, and sustainable food systems.