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Via email to: bns-bsn@hc-sc.gc.ca

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Re: Proposal to classify Partially Hydrogenated Oils as prohibited adulterants by the summer of 2018

As a former member of the Trans Fat Task Force (2004-2006), and a persistent proponent of a mandatory approach to restricting trans fat in the Canadian food supply, I congratulate Health Canada and the Minister of Health for finally implementing the spirit of the Task Force recommendations.

The Task Force envisioned that its unanimous recommendations would be implemented by 2010, eight years earlier than the present proposal. The extent to which the extensive delay is attributable to a failure of political leadership, industry pressure for delays (despite the public expressions of support for from key industry representatives on the multi-stakeholder Trans Fat Task Force), and administrative inertia at Health Canada is not obvious from the public record and remains the subject of speculation. However, a change in political leadership in 2015 and the election platform commitment to act were certainly pivotal.

During the past two decades, expert estimates of the harm caused by the consumption of PHOs have ranged from 1,000 to 8,000 Canadian deaths per year, the lower figures reflecting projections of voluntary improvements in the food supply. The cancellation of the trans fat monitoring program, and long delays between comprehensive monitoring of nutrition-related aspects of the Canadian food supply and the diets of Canadians have impaired Health Canada's capacity to measure the impact of this delay on public health. By extension, this lack of information impaired government's and industry's accountability for protecting Canadians.

Excess consumption of alcoholic beverages, tobacco use, and poor diet play causal roles in the development of diseases responsible for approximately than half of deaths in Canada, while pharmaceutical drug and medical technology industries profit from high rates of these diseases. The Government of Canada should be wary about giving representatives of profit-seeking industries influential roles in advising governments on public policies in which they have financial conflicts of interest.

Respectfully submitted,

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Helping to make Canadians more savvy eaters and governments and industry more accountable.

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