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June 10, 2022

**Re: Submission concerning the National Pathways Document**

**Preface concerning governance**

Overall, the [13-page 2019 “Food Policy for Canada”](#) consists mainly of a list of outcomes and an expectation that a Food Policy Council would particularize policy directions.

To date, the Council is comprised approximately of 50% persons with financial investments or interests in the food industry, has held no public meetings or consultations, and according to its website, has held only four substantive meetings since being appointed 1.5 years ago and, apart from articulating some elements of a national school food program (a very promising initiative that the federal government has already made some important commitments to implement in its 2019 and 2022 budgets and 2021 election platform), other topics seem to remain stated in very abstract terms with no estimates of budgetary commitments required, law reforms required, or timelines.

In practice, the government’s policies of “everyone at the table” and “expertise and lived experience to bring diverse perspectives to the table” have led to an advisory body populated with approximately half paid industry interests at heart.

The 2019 policy statement was short on discernable, concrete policy objectives. At best, it set only four United Nations 2030 Sustainable Development Goal targets to end hunger, reduce by one-third prematurely illness from non-communicable disease, reduce by 50% food waste, and ill-defined efforts to mitigate climate change.

**1. REDUCING NON-COMMUNICABLE DISEASES BY ONE-THIRD BY 2030**

Reducing diet-related disease requires a suite of policy interventions to improve the nutrition information environment and financial incentives for Canadians to purchase and consume healthy diets. Doing so requires exercising several departmental authorities outside Agriculture and Agri-food Canada, especially including Health Canada, Human Resources and Social Development Canada, Statistics Canada, and the Department of Finance.

**a. Quantify the burden of nutrition-related illness**

In order to effectively reduce non-communicable diseases by one-third, Health Canada must state the baseline and articulate a regulatory approach and scalable (to 37 million Canadians) programs for achieving that goal. Launching a few pilot projects will not suffice. Taking a passive approach to developing school

curriculum (where 5 million Canadians are captive audiences and direct conduits to 15 million more Canadians in their families) or nurses and medical profession counselling materials is also a foreseeably evasive and ineffective approach to achieving this goal.

## **b. National Universal Healthy School Food Program**

The National Pathway document underscored the specific importance of a national school food program as follows:

*Stakeholders and partners also raised the importance of a universal, multicomponent school food program with a scope that goes beyond the provision of food to address broader food system and societal issues, including food literacy, health promotion, equity, environmental sustainability, and connections with the community, as well as with the local food systems, including the agriculture and food sector and harvesting of traditional country foods. A national school nutritious meal program can make important contributions to food security by providing access to nutritious and safe food that meets dietary needs and cultural preferences of children and families, while more broadly improving the health and wellbeing of children and youth. The Government of Canada has committed to engaging with provincial, territorial, municipal, Indigenous partners, and stakeholders to work towards the development a National School Food Policy and work toward a national school nutritious meal program.*

However, creating a program that provides access to school food only to low-income children will foreseeably and unavoidably create a stigma that will undermine the benefit for the students who could benefit most from the program. Children should not have to choose between being hungry and ashamed. However, the [2022-2023 Federal Budget](#) states the following at page 190:

### ***“National School Food Policy***

*Ensuring that the most vulnerable children have the healthy, nutritious food they need to grow and learn is vitally important. However, nearly two million children in Canada are at risk of going to school hungry on any given day. Over the next year, the Minister of Agriculture and Agri-Food and the Minister of Families, Children and Social Development will work with provinces, territories, municipalities, Indigenous partners, and stakeholders to develop a National School Food Policy and to explore how more Canadian children can receive nutritious food at school.”<sup>1</sup>*

This is one-year delay in the election promise (which planned a \$200 million budget allocation in the current fiscal year), though it is at least an encouraging placeholder. Moreover, the plain meaning of this budget statement is that the federal government appears to be planning to use means-testing to restrict the benefit to the "most vulnerable children." It is possible that the Department of Finance analysts are unfamiliar with the risk that stigma can undermine program effectiveness. It bears noting that, in the series of seven “conversations” convened by the National Advisory Council on Poverty (each with nearly 200 anti-poverty advocates, academic experts, and social policy think tank researchers participating) not a single person advocated a means-tested school food program.

Yesterday, the United Nations Human Rights Council’s Committee on the Rights of the Child published its formal “Concluding Observations” on Canada’s performance in implementing commitments under the

*Convention on the Rights of the Child*. The Committee did not expressly urge Canadian governments to implement universal school meal programs, but did caution against using user fees at school (such as commercial food services to raise funds or using means-testing to provide food programs). It recommended:

*“Take immediate measures to remove the need for user fees at the level of compulsory education...”*

Furthermore, in 2013, the Committee issued [General Comment No. 15](#) to all governments stressing the importance of school food programs by concluding:

*“School feeding is desirable to ensure all pupils have access to a full meal every day, which can also enhance children’s attention for learning and increase school enrolment. The Committee recommends that this be combined with nutrition and health education, including setting up school gardens and training teachers to improve children’s nutrition and healthy eating habits.”*

The 2018 *What We Heard Report* of the Ottawa National Food Policy Summit acknowledged several policy concepts and principles, but **only one** crystalized recommendation:

*During consultations many specific calls for the implementation of school food programming were made. Participants thought that school nutritional programs could help alleviate food insecurity. As well, it was suggested that provision of meals in schools can help ensure that children eat a sufficient quantity of healthy food, a concern not limited to lower income groups. There were also calls for revised school lunch guidelines, including ensuring students have enough time to eat.<sup>2</sup>*

Likewise, according to the [Canadian Food Policy Advisory Council’s minutes](#), advice about a national school food program was offered and updated at each of the four substantive meetings since its inception meeting in March 2021, the only true food security proposal.

UNICEF, the 190-group [Canadian Coalition for Healthy School Food](#), and the [Centre for Health Science and Law](#) are among 65 civil society and intergovernmental organizations, and 63 national governments, as well as the African Union and European Union that support the [global School Meals Coalition](#). The government of Canada is not yet among supporters even though the federal government has promised three times since 2019 to establish a national school food program, making it the last to implement such a program among G-7 countries.

In Canada and internationally, the Canadian Coalition for Healthy School Food and CHSL urge the implementation of a universal healthy school food program that is focussed on environmentally sustainable foods, with robust conflict-of-interest safeguards, and integrated with nutrition education curriculum.

Canadian children are all eligible for public healthcare and elementary and secondary education when attendance is mainly required by law. Paragraph 120 of the government’s report does not acknowledge that adherence to school nutrition standards is voluntary, weakly monitored, and not

enforced or that government funding is only enough to feed 4% of students. So, programs court community and food industry donations of cash and food with the attendant governance risks. The [Coalition for Healthy School Food estimates that a fully funded program would cost approximately 2% of the public expenditures on elementary and secondary education.](#)

Numerous experts have stressed the importance and viability of a national program.<sup>3</sup> The former U.N. Special Rapporteur on the Right to Food recommended that Canada:

*Formulate a comprehensive rights-based national food strategy...as part of this strategy, create a nationally funded children and food strategy (including school-feeding food literacy and school garden programmes) to ensure that all children, at all times, have access to healthy and nutritious food;*<sup>4</sup>

Since our 2019 submission to the UN Committee (which coincided with the federal budget promise, several systematic reviews of scientific literature revealed the effectiveness of school meal programs to improve educational and health outcome in low-and middle-income countries<sup>5</sup> as well as high-income countries like Canada.<sup>6</sup>

In December 2021, Prime Minister Trudeau publicly mandated the Minister of Families, Children and Social Development to work with the Minister of Agriculture and Agri-Food to create the first national policy for school food<sup>7</sup> with the \$1 billion distributed over five years promised in the governing party's election platform in 2021.<sup>8</sup> This is a transformative step forward, though the combined federal, provincial and local financial commitment would need to be approximately 10-fold higher when fully rolled out to fund the universal program recommended by the Coalition for Healthy School Food.

The eight guiding principles urged by the Canadian Coalition for Healthy School Food include that the new school food program be: (1) health-promoting, (2) universal (like education and health care, not just for low-income students), (3) cost-shared, (4) flexible and locally adapted, (5) indigenous controlled where applicable, (6) supportive of community economic development, (7) supportive of food literacy, and (8) supported by conflict-of-interest and accountability safeguards.

The right to health embedded in the section 7 right to “right to life, liberty and security of the person” in the *Canadian Charter of Rights and Freedoms* has not been fully articulated in relation to non-criminal matters like the right to food at school while students are legally obliged to attend. However, the federal spending power and scientific expertise to prescribe dietary guidance and regulate food marketing are beyond dispute.<sup>9</sup> (In many countries, school meal programs are established by acts of Parliament and in some jurisdictions, mandated constitutionally, such as in Brazil and India.) However, the United Nations Human Rights Council's Committee on the Rights of the Child has opined that the international right to health extends:

*to a right to grow and develop to [one's] full potential and live in conditions that enable them to attain the highest standard of health through the implementation of programmes that address the underlying determinants of health.*<sup>10</sup>

Likewise, the United Nations *Committee on Economic, Social and Cultural Rights* held that the right to food is realized when:

*every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement'. It goes far beyond the right to be free from hunger and includes the right to live in food environments where healthy food is accessible, affordable and acceptable.<sup>11</sup>*

U.N. Human Rights Council urged all member states to

*Review the existing systems of agricultural subsidies, in order to take into account the public health impacts of current allocations, and use public procurement schemes for school-feeding programmes and for other public institutions to support the provision of locally sourced, nutritious foods;<sup>12</sup>*

### **A special note about Conflict-of-Interest Safeguards in school foods**

Health Canada wisely established firewalls around Health Canada officials responsible for revising *Canada's Food Guide 2014-2019*, but the news media eventually learned that food industry lobbyists made efforts to influence the *Food Guide* indirectly through sympathetic, willing officials in the Department of Agriculture and Agri-food, as well as MPs, and cabinet ministers. Canadian federal policies on conflicts-of-interest safeguards have been inconsistent. For instance, Health Canada has not kept industry at arm's length in setting food label or school nutrition standards in recent years. Likewise, during ongoing negotiations at the Codex Alimentarius Commission, Canadian officials opposed guidance that would have expressly authorized governments to establish conflict-of-interest safeguards in setting front-of-pack nutrition labelling regulations, effectively discouraging national governments from doing so. Likewise, Canadian federal government officials have not supported proposals to negotiate new standard-setting guidance on environmental impact labelling for food, even though food systems are estimated to contribute one-third of greenhouse gas emissions worldwide.<sup>13</sup>

The World Health Organization observed globally in school nutrition guidance published last year:

*"Industry was generally found not to be supportive of proposed school food standards."<sup>14</sup>*

According, the World Health Organization recommended that school food programs include:

*"Mechanisms to protect against conflicts of interest and safeguard public health."*

While Canadian producers of nutritious foods may commercially benefit from school food procurement (especially if environmental impact policies favour food that has travelled short distances), governance that allows producers and their champions in government to formulate and steer procurement would be unfair and could foreseeably undermine the health of children and the environment. Indeed, food industry influence and the policy of providing markets in schools for U.S. crop surpluses are widely regarded as fundamental design failures of the United States school breakfast and lunch programs (in addition to stigmatizing income-means-testing).

**REMEDY:** Launch a national universal, publicly funded, environmentally sustainable, healthy school food program with commercial conflict of interest safeguards and cost-shared with other levels of government.

### **c. Establish new front-of-package labelling to promote healthy food choices.**

Health Canada officials concede that the government’s 2018 proposed approach to front-of-pack nutrition labelling is based primarily on an approach recommended by the Retail Council of Canada (an industry association) and a similar approach promoted by governments in South America that are in the midst of nutrition transitions between traditional and processed food diets and where the GDP per capita ranges between 5% and 30% of Canada’s.

As noted above, unlike for the development of the 2019 edition of *Canada’s Food Guide*, Health Canada has not established conflict-of-interest safeguards in the development of nutrition labelling policies. However, last year, the World Health Organization recommended that label policies be developed with:

*“Mechanisms to protect against conflicts of interest and safeguard public health.”<sup>15</sup>*

The Canadian food supply is more like high-income countries in Europe where a different approach to front-of-pack nutrition labelling (the Nutri-score) is currently being tested with consistently better performance outcomes than the approach that Health Canada advocated in 2018. Health Canada’s 2018 proposal considers only sodium, saturated fat, and sugar, the excesses of which are responsible for approximately one-fifth of all diet-related disease in Canada, but ignores the other nutrients and food ingredients, the excesses or deficiencies of which are responsible for the other 80% of diet-related cardiovascular disease, cancer and diabetes.<sup>16</sup> Researchers at Oxford University (including a member of CHSL’s Canadian Scientific Advisory Board) are currently developing an even more comprehensive front-of-pack nutrition labelling system. Health Canada’s approach should not be based on already outdated science, the precedents of dissimilar national marketplaces, or industry-preferred models.

The government of Canada hosts and chairs the international standard-setting Codex Committee on Food Labelling—in which I have participated as an officially recognized Observer since 1998—that finalized WTO-recognized guidance to national governments on the development of front-of-pack nutrition labelling systems in late 2021. Canadian officials opposed proposals to expressly authorize national governments to implement conflict-of-interest safeguards, the effect of which is to discourage (though not completely prevent) governments from doing so.

Finally, focussing only on amounts of sodium, sugar, and saturated fat—especially with a mixture of exemptions and varying standards by serving size—the 2018 approach could lead to a decade or more of routinely confusing and misleading guidance to consumers that is (1) contrary to the statutory requirement that labelling be non-misleading, (2) promotes guidance that is routinely and extensively inconsistent with its voluntary sodium-reduction program reduction-targets, and (3) comprises a huge missed opportunity to conscientiously develop a labelling system that will truly help Canadians choose healthier foods.<sup>17</sup>

**REMEDY: Work with researchers to develop a front-of-pack nutrition labelling system following a procedure that is free of conflicts of interest, based on the best available evidence, and suited to Canada’s modern food supply.**

#### d. Food Tax Reform

In its 2021 election platform, the federal government committed to appoint a Permanent Economic Advisory Council,<sup>1</sup> though it has not yet done so. Such councils, including one appointed by the previous Minister of Finance, typically focus solely on increasing economic output with little regard to the adverse consequences on the health of the workforce or the demands that unhealthy living. For instance, promoting the production, sale, and consumption of alcoholic beverages or poor diet strains provincial health care budgets and social protection programs that compensate individuals and their families suffering from premature illness and death. The elaboration of the National Pathway and the work of the Permanent Economic Advisory Council should be mindful of the risk to the public of appointing captains of industry with financial conflicts of interest that interfere with them providing sound advice, for instance, on reforming HST and other consumption taxes to ensure that they encourage healthy consumption patterns, not discourage them.

Federal and provincial governments currently collect nearly \$10 billion from HST/GST and provincial sales taxes, but taxability rules are only weakly correlated with environmental and health impact. The beneficial impacts of these taxes in some cases are largely coincidental. Food taxation (like labelling) is an effective way to promote a nutritious and zero-carbon economy. Currently, HST/GST and provincial taxes are generally applied to restaurant foods (which tend to be nutrient-poor, but are not exclusively so) and the definition of “basic groceries” in the *Excise Tax Act* is only weakly correlated with health and environmental impact. Diets high in sodium, saturated and trans fats, added sugars and processed and red meat, and low in whole grains, fruits, vegetables, nuts and seeds, polyunsaturated fat were estimated to cause 36,000 deaths and waste 675,000 disability-adjusted life years (DALYs) in Canada in 2019, according to the Institute for Health Metrics and Evaluation’s Global Burden of Disease.<sup>18</sup> And the United Nations Intergovernmental Panel on Climate Change (IPCC) estimates that, worldwide, 21–37% of total greenhouse gas (GHG) emissions are attributable to the food system and that climate change will have important negative impacts on food security.<sup>19</sup> (See more below.)

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<sup>1</sup> *A re-elected Liberal government will:*

- *Establish a permanent Council of Economic Advisors to provide independent advice to government on long-term growth...The...Council will draw on expertise inside and outside of government to provide input and policy options that help Canada achieve a higher standard of living, better quality of life, inclusive growth, and a more innovative and skillful economy.*
- *Undertake a comprehensive strategic policy review of government programs...this continuous process will examine how effectively each major program and policy is doing in meeting the biggest challenges of our time, including: achieving net-zero emissions by 2050, improving fairness and equality, and promoting quality of life and growth for everyone.*
- *Adopt quality of life budgeting. Building on the work done over the last two years to develop Canada’s first-ever quality of life framework...such as reducing poverty or improving the environment...*
- *Use the government’s buying power to set standards and norms, requiring suppliers of goods and services to apply the highest ethical and sustainability standards across their supply chains. And we will further strengthen federal procurement policies to integrate human rights, environment, social and corporate governance...*

**REMEDY: Conduct a review of the nutritional and health implications of the current taxation of foods and make recommendations to revise the so-called list of “basic groceries” that are zero-rated for HST/GST.**

#### **e. Sodium Reduction**

In 2013, Liberal MPs voted [unanimously](#) in favour of [Bill C-460, Sodium Reduction Strategy for Canada Act](#), which would have, among other things, mandated warnings on the labels of foods that failed to meet voluntary sodium-reduction targets. The 2015 Liberal election platform promised:

*“To help families make better food choices, we will...bring in tougher regulations to...reduce salt in processed foods;”*

However, since then, the government has weakly pursued a voluntary sodium-reduction strategy, ignored its promises to mandate sodium reduction and awarded a \$100,000 prize and \$5 million research grant to a McMaster University researcher who promotes the [largely discredited view that Canadians should consume triple the amount of salt that Health Canada recommends](#).

**REMEDY: Table government legislation modelled on Bill C-460 from the 41<sup>st</sup> Parliament.**

#### **f. Restrict advertising directed at children**

Health Canada’s approach to restricting marketing to children—based only on the amounts of sugar, saturated fat, and sodium—is foreseeably and extensively permeable to the most common and troublesome food ads targeting children, including:

- sugary soft drink and restaurant logos and mascots and “place” ads,
- sugar-free diet pop which looks nearly identical to sugary pop,
- nutritionally vacuous foods (such as white bread),
- physical-activity-squandering video games, etc.,
- “trophy” nutritious foods for brands (e.g., salads at McDonald’s or coffee at Tim Hortons), and
- sponsorship ads and catering for fast food and other junk foods for children’s sports teams.<sup>20</sup>

The nutrient-based ban approach is constrained by the perspective of federal health officials who, traditionally, see their mandates as being confined by scope of the role of the Minister of Health in the *Food and Drugs Act*. Stove-pipe thinking should not compel the government to implement foreseeably ineffective and legally vulnerable regulations.

Although no comprehensive, contemporary advertising spending data is publicly available for Canada, data subpoenaed by the US Federal Trade Commission in 2012 indicated that more than



60% of food advertising to children and teens promoted soft drinks and fast-food restaurants. Furthermore, the nutrient-based approach—which was originally championed by, now retired, Senator Nancy Greene Raine—will provide **less protection** to children under the age of 13 in the rest of Canada than has been provided to Quebec children since 1980. The Quebec ban on all commercial advertising withstood legal challenges to the Supreme Court of Canada, although it leaves teenagers completely unprotected.

The province of Quebec uses a different approach. Since 1981, the Quebec *Consumer Protection Act* has prohibited commercial advertising to children under age 13 of all products, services, and companies, not just certain foods, based on the premise that children are uniquely vulnerable to marketing and deserve protection from manipulation by commercial actors.<sup>21</sup> The Supreme Court of Canada rejected a constitutional challenge to the Quebec advertising ban in 1989 brought by an aggrieved toy company, by concluding that all advertising to children is:

“...*per se* manipulative. Such advertising aims to promote products by convincing those who will always believe.”<sup>22</sup>

In the recent past, the federal government supported Senator’s bill to restrict advertising nutrient-poor foods, but weakened the protections (from age 16 to age 12) and was unable or unwilling to ensure the bill proceeded to a final vote before the summer recess preceding the 2019 election.<sup>23</sup>

Prime Minister Trudeau’s December 2021 [open letter mandated the Minister of Health Dr. Yves Duclos take steps to support healthy eating including by “supporting restrictions on the commercial marketing of food and beverages to children.”](#) Though Minister Duclos has not yet acted on that mandate, in February 2022, a Member of Parliament from the governing Liberal Party of Canada proposed [Bill C-252 An Act to amend the Food and Drugs Act \(prohibition of food and beverage marketing directed at children\)](#) which would restrict the advertising only of foods considered high in fats, sugar, or salt targeting to children aged up to age 12. Not only would this bill do nothing to help teenagers but monitor advertising directed toward them, it would not prohibit advertising brands, logos, restaurants, or artificially sweetened soft drinks and energy drinks to children of any age. These loopholes are big enough to render the measures almost completely ineffective.

The federal *Competition Act* and *Food and Drugs Act* already prohibit misleading advertising. So, interpretive guidance from the enforcement agencies, the federal Cabinet, or Parliament could confirm in writing that all advertising aimed at children under the age of 18 or 19 is prohibited. This would prevent the courts from settling ambiguity in favour of self-serving companies whose business models depend on manipulating children and teenagers. Provincial age-of-majority statutes stipulate that childhood ends at age 18 (like the *Convention*) or 19. And section 9 of the federal *Competition Act* states that only persons 18 years or older may officially complain about misleading ads.

Although the United Nations Committee on the Rights of the Child did not expressly criticize Canada’s failure to restrict advertising to children, in 2013 the Committee published [General Comment No. 16](#) on business and human rights which urged all governments that:

*“States are also required to implement and enforce internationally agreed standards concerning children’s rights, health and business, including the World Health Organization Framework Convention on Tobacco Control, and the International Code of Marketing of Breast-milk Substitutes and relevant subsequent World Health Assembly resolutions...Children may regard marketing and advertisements that are transmitted through the media as truthful and unbiased and consequently can consume and use products that are harmful. Advertising and marketing can also have a powerful influence over children’s self esteem, for example when portraying unrealistic body images. States should ensure that marketing and advertising do not have adverse impacts on children’s rights by adopting appropriate regulation and encouraging business enterprises to adhere to codes of conduct and use clear and accurate product labelling and information that allow parents and children to make informed consumer decisions.”*

And, yesterday’s “Concluding Observations” urged Canada to mandate due diligence by business actors to protect children’s rights (as the [European Union will soon require](#)):

***“Children’s rights and the business sector***

*[The] Committee recommends that [Canada] establish and implement regulations to ensure that the business sector complies with international and national human rights, labour, environment and other standards, particularly with regard to children’s rights...[and] Require companies to undertake...full public disclosure of the environmental, health-related and other children’s rights impacts of their business activities and their plans to address such impacts.”*

**REMEDY:** The federal government could promulgate strict regulations on the advertising and promotion modelled on the Quebec approach, but raise the age of protection to all minors up to age 18 or 19 as applicable age-of-majority laws specify and to intervene to ensure that any judicial or administrative decisions respecting the statutory limits on misleading advertising are interpreted in the spirit of the Supreme Court *Irwin Toy* decision on the matter and in full consideration of the *Convention on the Rights of the Child*, Canadian age of majority laws, and the principle of the best interests of the child. This approach is based on the time-tested, court-tested Quebec *Consumer Protection Act* approach that has inspired laws far beyond Canada’s borders. It could be achieved nationally by codifying similar child-protection measures in the current advertising rules in both the *Food and Drugs Act* and *Competition Act* and extending the age of protection to at least age 18.

## **2. ENDING HUNGER BY 2030**

In CHSL’s view, food banks are symptoms of the failures of rights-based social policy. The hundreds of millions of dollars that the federal government has poured into food banks during COVID-19 to multiply their impact is still a tiny fraction of 1% of the \$100 billion spent on food by Canadians, [one-quarter of whom reported eating less food](#) in response to food inflation and [4 million Canadians living in various degrees of food insecurity according to Food Secure Canada](#). These are problems that are not rectified by a few bags of groceries; they require solutions that address income. Consult the National Advisory Council on Poverty that is now mandated to help achieve Canada’s poverty reduction objectives.

However, there is a food-specific strategy that could help. Consider mandating that the price per 100 grams of foods be provided on grocery stores shelf tags (or merchant stickers on food packages) and in product descriptions of online food sales in large enough print size to help consumers shopping with budgetary constraints. Such information would also help ensure that the potentially price-inflating impact of green food labels is kept in check. This information could also be used in conjunction with effective front-of-pack nutrition labelling to locate inexpensive nutritious food.

All major food retailers provide price-per-100-gram information on shelf tags, but often this information is too small to read or notice and it is typically missing from grocery store websites. Food that is objectively more valuable to consumers—especially better for human health or the environment—should be labelled in a way that helps consumers effectively compare the impact of those features on their household finances. (See also CHSL’s recommendations about HST/GST/PST tax reform.)

### **3. REDUCING FOOD WASTE BY 50% BY 2030**

While reducing food waste has value, especially for reducing the environmental impact of the food supply, CHSL’s expresses the concern that mitigating climate change might be used to justify feeding garbage to poor people and that reducing food waste should not detract attention from reducing the consumption of ruminant animal livestock (mainly cows). See below.

### **4. MITIGATING CLIMATE CHANGE BY 2030**

#### **a. The importance of environmental impact labels, especially revealing the impact of cattle.**

Canada’s food policy and the political leaders that implement it must play constructive roles in reducing greenhouse gas emissions to help tackle climate change. As the Government of Canada and Prime Minister Trudeau so-often assert, climate change is pressing global threat that requires urgent corrective action. According to the Liberal Government’s 2021 Liberal election platform (at page 42), Greenhouse Gas emissions from the oil and gas sector have risen since 2005 to comprise 26% of Canada’s total emissions, making it the largest emitting sector in Canada.<sup>24</sup> The election platform was silent on the contribution of food systems or livestock to climate change.

However, the United Nations Intergovernmental Panel on Climate Change (IPCC) estimates that 21–37% of total global greenhouse gas (GHG) emissions are attributable to food systems and that climate change will have important negative impacts on food security.<sup>25</sup> The food system rivals the energy sector for contributions to greenhouse gas emissions; according to the IPCC, the energy sector contributed 35% of GHGs in 2010.<sup>26</sup> Consumers in high-income countries (like Canada) are still consuming high levels of red and processed meat; although the downward shifts in some socioeconomic and demographic groups is encouraging, consumption in low- and middle-income countries is rising, especially in China, Brazil, and in urban areas.<sup>27</sup>

However, a recent study conducted by researchers at Johns Hopkins University and New York University concluded that the conventional method for calculating methane gas contributions by livestock underestimates its impact on climate in high-income countries like Canada and the

United States to the extent the true methane contributions of meat and dairy production may be 39% to 90% higher.<sup>28</sup> Methane accounts for 14% of total global greenhouse gas emissions and is 67 times more potent than CO<sub>2</sub> in temperature change potential after 20 years according to the UN IPCC.<sup>29</sup>

The EAT-Lancet Commission stressed that there is an urgent need to mandate eco-labelling on food products to help reduce the environmental impact of food systems, particularly greenhouse gas emissions, which seems more urgent<sup>30</sup> than the tentative commitment to “to explore possible work on sustainability labelling within the mandate of CCFL” referenced in the recent Circular Letter beginning the deliberation process.

Fortunately, there is great potential for improvement. A 2016 systematic review found that of 14 common sustainable dietary patterns across reviewed studies, reductions in greenhouse gas emissions from food by as much as 70-80% is possible by adopting sustainable dietary patterns and that reductions in environmental footprints were generally proportional to the magnitude of animal-based food restriction. Dietary shifts modelled also yielded modest benefits in all-cause mortality risk.<sup>31</sup>

**b. Conflict of interest safeguards and, concomitantly, mandatory labelling should be central considerations in Canadian labelling (and procurement) practices**

Canada will be presiding over global standard-setting guidelines for “sustainability” labelling at the Codex Committee on Food Labelling, which it chairs and for which it has provided secretariat support since the 1960s. Early discussions have posed a definition of “sustainability” that sidelines environmental concerns and have emphasized a voluntary approach. Promoting voluntary labelling schemes—the primary purpose of which is increasing sales through voluntary use—is skirting the main issue. Companies will have little incentive to participate in labelling systems that impugn the environmental (or human rights) pedigree of their own products. Mandating sustainability labelling is the only truly effective means of incentivizing sustainable production and consumption practices. Adding new voluntary labelling measures to Codex guidance may simply encourage governments to help companies inflate the prices of foods touted by green claims. The main lesson for the proliferation of voluntary self-serving systems is the need to create, in each country, a single publicly designed system. As a report of the French government to its Parliament noted:

*...observing a proliferation of private environmental labeling initiatives in this sector, France wishes to move forward with the development of a harmonized public system.*<sup>32</sup>

Climate change is a pressing, time-sensitive, global emergency requiring a proactive, decisive, and prompt response from the Codex Committee on Food Labelling and an ambitious global commitment to meet time-delimited greenhouse gas emission reduction targets. It is not a problem that is suited to years of deference to food industry expectations of regulatory forbearance, like the approach that the Codex Committee indulged for so many years while negotiating back-of-pack and front-of-pack nutrition labelling guidance.

As with nutrition labelling, the need for disclosing risk-related information does not always align with commercial incentives to do so. For example, when manufacturers of products that have high

negative impacts on the environment—like beef and (especially cow’s milk-based) breastmilk substitutes—can escape disclosing that risk to consumers simply by voluntarily refraining from doing so. Consumer behaviour will not be fully informed and could be undermined by voluntary environmental impact labelling, resulting in harm to the environment and public health. Presently, consumers are generally unaware of unstated risks.

Canada is the seventh-largest exporter of beef—after [Brazil, the United States, Australia, India, New Zealand, and Argentina](#)—which also makes it a leading producer and exporter of ruminant sources of greenhouse gas emissions.

As the Intergovernmental Panel on Climate Change indicates, the vast majority of food-related contributions to harmful greenhouse gas emissions emanate from cattle; as such, haggling over an algorithm to make fine distinctions among relative risks of other products may be a low-yield effort. For instance, in one analysis of the greenhouse gas emissions per kilogram of 94 foods sold in the United Kingdom, Oxford University researchers found that meat and fat from cattle and goats emitted 35-64 kgCO<sub>2</sub>e per kg of food. Coffee, at approximately 10 kgCO<sub>2</sub>e/kg was a distant second place and all other foods ranged from near-zero to 5 kgCO<sub>2</sub>e per kilogram of food.<sup>33</sup> However, even this was calculated on the basis of the weight of coffee beans and was reduced to 0.6 kgCO<sub>2</sub>e per kg of prepared coffee (i.e., a litre of coffee).<sup>34</sup> While some of those foods would generally be consumed in very small amounts (such as honey and coffee, much smaller than 100 grams in a sitting), this further underscores the point that beef and goat-related foods are much more GHG-emission-intensive than the rest of the food supply. Likewise, a recent study published in the prestigious scientific journals *Nature Food* estimated that 57% of GHG emissions from the food system comes from livestock.<sup>35</sup>

I look forward to continuing the dialogue as the direction the National Pathway needs to take comes into sharper focus. However, the time for unfocussed discussions is long passed. The climate emergency is pressing and soon passing the point of no return. Likewise, the harm to human health, economic productivity, and the costs of public and private indirect costs has been a slow-moving crisis for too long that has predictably and consistently damaged the Canadian economy.

Respectfully submitted,



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Centre for Health Science and Law

## Endnotes

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<sup>1</sup> The April 2022 Federal Budget <https://budget.gc.ca/2022/pdf/budget-2022-en.pdf> at page 190.

<sup>2</sup> Agriculture and Agri-food Canada. *What We Heard: Consultations on a Food Policy for Canada*. October 2018. Available at: <https://agriculture.canada.ca/sites/default/files/legacy/pack/pdf/20181025-en.pdf>

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<sup>3</sup> Including the former Chief Public Health Officer for Canada, the Ontario Healthy Kids Panel, a Harvard University research group, the World Cancer research Fund, the World Bank, the Organization for Economic Cooperation and Development, and the World Food Program, the House of Commons Standing Committee on Finance, the Standing Senate Committee on Social Affairs, Science and technology, and Senate Motion 358 of The Honourable Art Eggleton cited as follows:

World Scientific. *Global School Feeding Sourcebook*. Lessons from 14 countries. 2016. (Singapore/Geneva: World Scientific, 2016); and World Food Program, *State of School Feeding Programs Worldwide* (Rome: WFP, 2013):

[https://documents.wfp.org/stellent/groups/public/documents/communications/wfp257481.pdf?\\_ga=2.30297657.70688965.1531516853-1353648354.1531516853](https://documents.wfp.org/stellent/groups/public/documents/communications/wfp257481.pdf?_ga=2.30297657.70688965.1531516853-1353648354.1531516853) ;

The 1997 House of Commons Standing Committee on Finance stated:

*The Committee further recommends that the federal government partner with communities, parents, provincial governments, private corporations, the agri-food industry and voluntary organizations such as the Canadian Living Foundation to create a national school nutrition program. This type of partnership approach could apply to other organizations and initiatives as well. [citing Martha O'Connor, former Director General of the, now defunct, Breakfast for Learning Program:] 70% of Canadians believe that child hunger in Canada is more important than national unity or the deficit. Strategic investment in a national school nutrition program is an investment in the future of all Canadians” (at <http://www.ourcommons.ca/DocumentViewer/en/36-1/FINA/report-2/page-45#D>)*

David Butler-Jones, *The Chief Public Health Officer's Report on the State of Public Health in Canada 2008*, (Ottawa: Public Health Agency of Canada, 2008) at 41 states:

*When children go to school hungry or poorly nourished, their energy levels, memory, problem-solving skills, creativity, concentration and behaviour are all negatively impacted. Studies have shown that 31% of elementary students and 62% of secondary school students do not eat a nutritious breakfast before school. Almost one quarter of Canadian children in Grade 4 do not eat breakfast daily and, by Grade 8, that number jumps to almost half of all girls. The reasons for this vary – from a lack of available food or nutritious options in low-income homes, to poor eating choices made by children and/or their caregivers. As a result of being hungry at school, these children may not reach their full developmental potential – an outcome that can have a health impact throughout their entire lives.*

J Larry Brown, William H. Beardslee, Deborah Prothrow, *Impact of School Breakfast on Children's Health and Learning: An Analysis of the Scientific Research* (Nov. 2008). Unpublished Manuscript. Harvard School of Public Health. Available at:

[http://www.sodexofoundation.org/hunger\\_us/Images/Impact%20of%20School%20Breakfast%20Study\\_tcm150-212606.pdf](http://www.sodexofoundation.org/hunger_us/Images/Impact%20of%20School%20Breakfast%20Study_tcm150-212606.pdf). This November 2008 scientific literature review by experts at Harvard University concluded that, even before the U.S. government strengthened its nutrition standards:

*...more than 100 published research articles, provides the scientific basis for concluding that the [US] federal School Breakfast Program is highly effective in terms of providing children with a stronger basis to learn in school, eat more nutritious diets, and lead more healthy lives both emotionally and physically...significantly improves their cognitive or mental abilities, enabling them to be more alert, pay better attention, and to do better in terms of reading, math and other standardized test scores. Children getting breakfast at school also are sick less often, have fewer problems associated with hunger, such as dizziness, lethargy, stomach aches and ear aches, and do significantly better than their peers who do not get a school breakfast in terms of cooperation, discipline and inter-personal behaviors.*

Senate Standing Committee on Social Affairs, Science and Technology, *Obesity in Canada*, 2016:

[https://sencanada.ca/content/sen/committee/421/SOCI/Reports/2016-02-25\\_Revised\\_report\\_Obesity\\_in\\_Canada\\_e.pdf](https://sencanada.ca/content/sen/committee/421/SOCI/Reports/2016-02-25_Revised_report_Obesity_in_Canada_e.pdf) recommended:

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*“that the Minister of Health in discussion with provincial and territorial counterparts as well as non-governmental organizations already engaged in these initiatives:... Advocate for childcare facility and school programs related to breakfast and lunch programs...and nutrition literacy courses;”*

Ontario Healthy Kids Panel, *No Time to Wait: The Healthy Kids Strategy*, 2013 (Toronto: Ontario Ministry of Health and Long-term Care):

[http://www.health.gov.on.ca/en/common/ministry/publications/reports/healthy\\_kids/healthy\\_kids.pdf](http://www.health.gov.on.ca/en/common/ministry/publications/reports/healthy_kids/healthy_kids.pdf)

recommended:

*“2.8 Establish a universal school nutrition program for all Ontario publicly funded elementary and secondary schools.*

*2.9 Establish a universal school nutrition program for First Nations communities.”*

World Cancer Research Fund, Policy and Action for Cancer Prevention Food, Nutrition, and

Physical Activity: A Global Perspective, (London: WCRF, 2009):

[https://www.wcrf.org/sites/default/files/Policy\\_Report.pdf](https://www.wcrf.org/sites/default/files/Policy_Report.pdf) recommended:

*“Provide healthy daily meals for all staff and pupils, together with facilities for active recreation, activity and sports*

*Incorporate food and nutrition (including food preparation and cooking skills) and physical education into the mandatory core curriculum Ensure that teaching materials are independently originated and free from commercial bias*

*Do not allow vending machines that offer snacks high in sugar, fat or salt, or sugary drinks and withdraw such ‘fast’ foods and drinks from school canteens.”*

The Federation of Canadian Municipalities resolved in its 2018 annual meeting to:

*WHEREAS, 1.7 million Canadian households experience food insecurity, and the current patchwork of school food programming reaches only a small percentage of our over 5 million students, with Canada remaining one of the only Organization for Economic Co-operation and Development nations without a national school food program;*

*WHEREAS, the Coalition for Healthy School Food is working at a national level to advocate for the creation of a cost-shared Universal Healthy School Food Program that will enable all students in Canada to have access to healthy meals at school, serving culturally appropriate, local, sustainable food to the fullest extent possible;*

*RESOLVED, that the Federation of Canadian Municipalities advocate for a Universal Healthy School Food Program to the federal government.*

See: <https://www.fcm.ca/home/about-us/corporate-resources/fcm-resolutions.htm?lang=en-CA&resolution=8cf4c343-602c-e811-adbf-005056bc2614&srch=%25food%25&iss=&filt=false>

Senator Art Eggleton’s Motion M-358, which was not put to a vote, states:

*That the Senate urge the government to initiate consultations with the provinces, territories, Indigenous people, and other interested groups to develop an adequately funded national cost-shared universal nutrition program with the goal of ensuring healthy children and youth who, to that end, are educated in issues relating to nutrition and provided with a nutritious meal daily in a program with appropriate safeguards to ensure the independent oversight of food procurement, nutrition standards, and governance.*

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<sup>4</sup> UN Human Rights Council. Report of the Special Rapporteur on the right to food, Olivier De Schutter on his Mission to Canada. A/HRC/22/50/Add.1. Online at: <http://www.srfood.org/en/gender-and-the-right-to-food-3>

<sup>5</sup> For example, Wall C, Tolar-Peterson T, Reeder N, Roberts M, Reynolds A, Rico Mendez G. The Impact of School Meal Programs on Educational Outcomes in African Schoolchildren: A Systematic Review. *International Journals of Environmental Research in Public Health*. 2022 Mar 19;19(6):3666. doi: 10.3390/ijerph19063666. PMID: 35329356; PMCID: PMC8948774. Available at: <https://pubmed.ncbi.nlm.nih.gov/35329356/> and Pongutta S, Ajetunmobi O, Davey C, Ferguson E, Lin L. Impacts of School Nutrition Interventions on the Nutritional Status of School-Aged Children in Asia: A Systematic Review and Meta-Analysis. *Nutrients*. 2022 Jan 28;14(3):589. doi: 10.3390/nu14030589. PMID: 35276948; PMCID: PMC8839996.

Available at: <https://www.mdpi.com/2072-6643/14/3/589/pdf?version=1643527683> ; and Wang D, Fawzi WW. Impacts of school feeding on educational and health outcomes of school-age children and adolescents in low- and middle-income countries: protocol for a systematic review and meta-analysis. *Syst Rev*. 2020 Mar 16;9(1):55. doi: 10.1186/s13643-020-01317-6. PMID: 32178734; PMCID: PMC7075040. Available at: [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7075040/pdf/13643\\_2020\\_Article\\_1317.pdf](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7075040/pdf/13643_2020_Article_1317.pdf)

<sup>6</sup> Colley P, Myer B, Seabrook J, Gilliland J. The Impact of Canadian School Food Programs on Children's Nutrition and Health: A Systematic Review. *Can J Diet Pract Res*. 2019 Jun 1;80(2):79-86. doi: 10.3148/cjdr-2018-037. Epub 2018 Nov 15. PMID: 30430855.; Cohen JFW, Hecht AA, McLoughlin GM, Turner L, Schwartz MB. Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review. *Nutrients*. 2021 Mar 11;13(3):911. doi: 10.3390/nu13030911. PMID: 33799780; PMCID: PMC8000006. Available at: <https://www.mdpi.com/2072-6643/13/3/911> ; Chaudhary A, Sudzina F, Mikkelsen BE. Promoting Healthy Eating among Young People-A Review of the Evidence of the Impact of School-Based Interventions. *Nutrients*. 2020 Sep 22;12(9):2894. doi: 10.3390/nu12092894. PMID: 32971883; PMCID: PMC7551272. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7551272/pdf/nutrients-12-02894.pdf> ; Ronto R, Rathi N, Worsley A, Sanders T, Lonsdale C, Wolfenden L. Enablers and barriers to implementation of and compliance with school-based healthy food and beverage policies: a systematic literature review and meta-synthesis. *Public Health Nutrition*. 2020 Oct;23(15):2840-2855. doi: 10.1017/S1368980019004865. Epub 2020 Apr 22. PMID: 32317047. Available at: <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/F12530A91D8E7B0F1D4F7A48E7616877/S1368980019004865a.pdf/enablers-and-barriers-to-implementation-of-and-compliance-with-school-based-healthy-food-and-beverage-policies-a-systematic-literature-review-and-meta-synthesis.pdf> ; O'Brien KM, Barnes C, Yoong S, Campbell E, Wyse R, Delaney T, Brown A, Stacey F, Davies L, Lorien S, Hodder RK. School-Based Nutrition Interventions in Children Aged 6 to 18 Years: An Umbrella Review of Systematic Reviews. *Nutrients*. 2021 Nov 17;13(11):4113. doi: 10.3390/nu13114113. PMID: 34836368; PMCID: PMC8618558. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8618558/pdf/nutrients-13-04113.pdf>; Capper TE, Brennan SF, Woodside JV, McKinley MM. What makes interventions aimed at improving dietary behaviours successful in the secondary school environment? A systematic review of systematic reviews. *Public Health Nutrition*. 2022 Mar 31:1-50. doi: 10.1017/S1368980022000829. Epub ahead of print. PMID: 35357283. Available at: <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/B9EBFAE8B2DBB1846E563935BBB2CF6B/S1368980022000829a.pdf/what-makes-interventions-aimed-at-improving-dietary-behaviours-successful-in-the-secondary-school-environment-a-systematic-review-of-systematic-reviews.pdf>.

<sup>7</sup> Mandate letter: <https://pm.gc.ca/en/mandate-letters/2021/12/16/minister-families-children-and-social-development-mandate-letter>

<sup>8</sup> "Establishing a national school nutritious meals program" in the [2021 Liberal election platform at pages 7 and 76](https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf) at <https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf>

<sup>9</sup> Ironically, the federal authority over public health matters derives from federal criminal powers. P.W. Hogg, *Constitutional Law of Canada*, (Toronto: Thompson, Carswell: Loose-leaf) at 15-20.2 to 15-21, 16-12, 16-19, 16-21, 16-22, and 18-7 to 18-11.



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<sup>10</sup> Committee on the Rights of the Child, *General Comment No. 15 on the Right of the Child to the Enjoyment of the Highest Attainable Standard of Health*, CRC/C/GC/15, United Nations, 17 April 2013.

<sup>11</sup> *Committee on Economic, Social and Cultural Rights*. General Comment No. 12 on ‘The right to adequate food (art 11)’ (12 May 1999) UN Doc E/C.12/1999/5, at para 6.

<sup>12</sup> Human Rights Council Twenty-fifth session Agenda item 3 Promotion and protection of all human rights, civil, political, economic, social and cultural rights, including the right to development Report of the Special Rapporteur on the right to food, Olivier De Schutter. *Final report: The transformative potential of the right to food\** A/HRC/25/57 24 January 2014 at page 26.

Available at: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/105/37/PDF/G1410537.pdf?OpenElement>

<sup>13</sup> United Nations Intergovernmental Panel on Climate Change (IPCC). Special Report: Special Report on Climate Change and Land, CH05, Food Security. Executive Summary. 2019. Available at: <https://www.ipcc.ch/src/cl/chapter/chapter-5/>

<sup>14</sup> World Health Organization. *Implementing school food and nutrition policies*. (Geneva: WHO, 2021), e.g., at pages 3, 31, 51, 55, and 87. Available at: <https://apps.who.int/iris/rest/bitstreams/1369800/retrieve>

<sup>15</sup> WHO. *Implementing nutrition labelling policies*. WHO: Geneva, 2021. Available at: <https://apps.who.int/iris/rest/bitstreams/1369774/retrieve>

<sup>16</sup> Institute for Health Metrics and Evaluation. Global Burden of Disease database. (Seattle: IHME, 2019). Permanent link: <http://ghdx.healthdata.org/gbd-results-tool?params=gbd-api-2019-permalink/63dc0f89f9424e50ed8ba8354bc14b95>

<sup>17</sup> See our [September 2019 Gazette submission](#). And see our [April 2018 Gazette submission](#).

<sup>18</sup> Institute for Health Metrics and Evaluation. Global Burden of Disease database. (Seattle: IHME, 2019). Permanent link: <http://ghdx.healthdata.org/gbd-results-tool?params=gbd-api-2019-permalink/63dc0f89f9424e50ed8ba8354bc14b95>

<sup>19</sup> United Nations Intergovernmental Panel on Climate Change (IPCC). Special Report: Special Report on Climate Change and Land, CH05, Food Security. Executive Summary. 2019. Available at: <https://www.ipcc.ch/src/cl/chapter/chapter-5/>

<sup>20</sup> Bill Jeffery. Testimony on Bill S-228 before the Standing Senate Committee on Social Affairs, Science and Technology Available at: [https://sencanada.ca/content/sen/committee/421/SOCI/Briefs/Bill\\_Jeffery\\_brief\\_e.pdf](https://sencanada.ca/content/sen/committee/421/SOCI/Briefs/Bill_Jeffery_brief_e.pdf) Bill Jeffery, Protecting Quebec Kids from Advertising: The Charter of Rights and the Supreme Court Make Canadian History, 2017:2, *Food for Life Report* at 22-23.

Even if the bill were still passed in its current form in a subsequent Parliament, its full implementation would be delayed several years, hampered by major loopholes, and vulnerable to legal challenge. A future Parliament would need to restart the legislative approval process. Then, a future cabinet would need to promulgate regulations to stipulate nutrition criteria for eligible advertisements, but an express exemption for sports team sponsorships and place/brand advertising (restaurants and mascots), and a foreseeably loophole for cross-promotions (e.g., nutritionally vacuous diet drinks resembling sugary beverages) could greatly diminish the impact of the law in a marketing environment that is heavily dominated by soft drink and fast food restaurant ads on television. The law would likely be effective at preventing ads for candy and cheese, the nature of which products are less suited to the foreseeable loopholes. However, a proposed approach to front-of-pack nutrition labelling which would spare the vast majority of sugar cereals to carry high-sugar warnings, could become a lever for food companies to legal challenge in the courts stricter proposed nutrient limits for child-directed advertising.

<sup>21</sup> The Quebec legislation is not proactively enforced, but complaints from the Quebec-based NGO Coalition Poids have led to effective enforcement actions against McDonald’s, Coca-Cola, Burger King, Saputo, and General Mills, etc. See: <https://www.cqpp.qc.ca/en/our-priorities/food-marketing/marketing-to-kids/complaints-lodged/>

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<sup>22</sup> [Attorney General of Québec v. Irwin Toy, Ltd.](#), [1989] 1 *Supreme Court Reports* 927 at 988-9.

<sup>23</sup> Liberal political leadership of the current federal government supported an individual Conservative Senator's bill to restrict advising of some food to children, but was unable or unwilling to ensure that bill proceeded to a final vote legislative proposal for restrictions on the advertising and promotion of certain foods to children of yet-to-be defined nutrient-poor foods. *Bill S-228* was proposed by (now-retired) Senator Nancy Green Raine, an Olympic gold medalist skier who was voted Athlete of the 20<sup>th</sup> Century by *Maclean's Magazine* (a leading national news magazine). The federal government successfully urged the Senate to [expand protections in the bill to protect some teenagers, then narrowed it to cover only pre-teens](#) before possibly allowing it to [be defeated altogether for want of a single final vote in the Senate chamber before the October 2019 election](#). Reportedly, the bill was defeated by a procedural convention that allows a minority of unelected Senators to delay a vote indefinitely.

<sup>24</sup> Forward, for Everyone. 2021 Election Platform. Liberal Party of Canada. Available at: <https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf>

<sup>25</sup> Intergovernmental Panel on Climate Change (IPCC). Special Report: Special Report on Climate Change and Land, CH05, Food Security. Executive Summary. 2019. Available at: <https://www.ipcc.ch/src/cl/chapter/chapter-5/>

<sup>26</sup> Intergovernmental Panel on Climate Change. Energy Systems. 2020. Available at: [https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc\\_wg3\\_ar5\\_chapter7.pdf](https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_chapter7.pdf)

<sup>27</sup> Clonan A, Roberts KE, Holdsworth M. Socioeconomic and demographic drivers of red and processed meat consumption: implications for health and environmental sustainability. *Proceedings of the Nutrition Society*, Cambridge University Press. 2016 Aug;75(3):367-73. doi: 10.1017/S0029665116000100. Epub 2016 Mar 29. PMID: 27021468; PMCID: PMC4974628. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4974628/pdf/S0029665116000100a.pdf>

<sup>28</sup> Matthew N Hayek, Scot M. Miller. Underestimates of methane from intensively-raised animals could undermine goals of sustainable development. *Environmental Research Letters*, 2021; DOI: [10.1088/1748-9326/ac02ef](https://doi.org/10.1088/1748-9326/ac02ef) Available at: <https://iopscience.iop.org/article/10.1088/1748-9326/ac02ef/pdf>

<sup>29</sup> Intergovernmental Panel on Climate Change. *Climate change 2014: Synthesis report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Geneva: Intergovernmental Panel on Climate Change, 2014 at page 87. Available at: [https://www.ipcc.ch/site/assets/uploads/2018/05/SYR\\_AR5\\_FINAL\\_full\\_wcover.pdf](https://www.ipcc.ch/site/assets/uploads/2018/05/SYR_AR5_FINAL_full_wcover.pdf)

<sup>30</sup> Willett, W., Rockstrom, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., Garnett, T., Tilman, D., DeClerck, F., Wood, A., Jonell, M., Clark, M., Gordon, L. J., Fanzo, J., Hawkes, C., Zurayk, R., Rivera, J. A., De Vries, W., Sibanda, L.M., . . . Murray, C. J. L. (2019). Food in the anthropocene: The EAT–lancet commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), 447–492, including for example at p. 478 and Table 6. Available at: <https://www.thelancet.com/action/showPdf?pii=S0140-6736%2818%2931788-4>

<sup>31</sup> Aleksandrowicz L, Green R, Joy EJ, Smith P, Haines A. The Impacts of Dietary Change on Greenhouse Gas Emissions, Land Use, Water Use, and Health: A Systematic Review. *Public Library of Science (PLoS One)*. 2016 Nov 3;11(11):e0165797. doi: 10.1371/journal.pone.0165797. PMID: 27812156; PMCID: PMC5094759. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5094759/pdf/pone.0165797.pdf>

<sup>32</sup> *Rapport du Gouvernement au Parlement. Affichage Environnemental des Produits Alimentaires. Bilan de l'Expérimentation et Enseignements Synthèse*. Paris, France. Janvier 2021. Available at: <https://librairie.ademe.fr/consommer-autrement/5465-affichage-environnemental-des-produits-alimentaires.html>

<sup>33</sup> Scarborough P, Appleby PN, Mizdrak A, Briggs AD, Travis RC, Bradbury KE, Key TJ. Dietary greenhouse gas emissions of meat-eaters, fish-eaters, vegetarians and vegans in the UK. *Climate Change*. 2014;125(2):179-192. doi: 10.1007/s10584-014-1169-1. Epub 2014 Jun 11. PMID: 25834298; PMCID: PMC4372775. Available at: [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4372775/pdf/10584\\_2014\\_Article\\_1169.pdf](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4372775/pdf/10584_2014_Article_1169.pdf)

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<sup>34</sup> Personal email communication from the principal investigator on April 25, 2022 confirming the greenhouse gas impact of 190 of prepared coffee.

<sup>35</sup> Xu, X., Sharma, P., Shu, S. *et al.* Global greenhouse gas emissions from animal-based foods are twice those of plant-based foods. *Nature Food* 2, 724–732 (2021). <https://doi.org/10.1038/s43016-021-00358-x> Available at: <https://www.fao.org/3/cb7033en/cb7033en.pdf>