

July 24, 2008

Ms. Janet Beauvais  
Director General, Food Directorate  
Health Products and Food Branch  
251 Sir Frederick Banting Driveway  
Tunney's Pasture A.L. 2202E  
Ottawa, ON K1A 0K9

Dear Ms. Beauvais:

We are writing to you on behalf of the Ontario Public Health Association (OPHA), and the OPHA Food Security Workgroup. OPHA represents over 3,000 public health practitioners through individual memberships and 10 constituent societies. The association's mission is to provide leadership on issues affecting the public's health.

OPHA supports the submission of the Dietitians of Canada, which was subsequently endorsed by the Canadian Pediatric Society, regarding the Health Canada proposal for the discretionary fortification of foods, as attached. In particular, we support fortification only where a nutrition rationale has been identified. A nutrition rationale would include evidence that the nutrient to be added is a significant factor in the prevention of disease and that it is either difficult to obtain from the Canadian food supply or is not consumed in adequate amounts. OPHA does not support discretionary fortification, as outlined within Health Canada's Proposed Policy and Implementations Plans regarding the Addition of Vitamins and Minerals to Foods. However, to respond to an identified nutrition need, OPHA supports the mandatory fortification of specific food vehicles.

You mention in your May 13, 2008 letter to Lynda Corby that one of Health Canada's focuses was to respond to "... industry interest in innovation and in marketing products with a nutrient advantage." However, the proposal for discretionary fortification does not support the healthy eating messages in *Eating Well with Canada's Food Guide*. Rather, there is a distinct risk that consumers will be at risk for consuming even more foods high in fat, sugar and salt, when the label announces the addition of a particular nutrient which may sound appealing to the consumer.

Discretionary fortification may support industry demands for innovation and marketing, but does not necessarily support the public's health. We suggest the integrity of our food supply is better served by encouraging Canada's food industry to do less processing, thereby preserving the original variety and quantities of all nutrients in the food, rather than attempting to partially restore and/or add to these with fortification.

We would welcome an opportunity to discuss our concerns about discretionary fortification; please contact Tracy Woloshyn, Chair of the OPHA Food Security Workgroup, at 905-895-4512 ext. 4352.

Sincerely,

Carol Timmings  
President

Cc: Mary L'Abée, Director, Bureau Nutritional Sciences  
Linda Corby, Director Public Affairs, Dietitians of Canada