

CFG Phase 2 Consultation – OSNPPH responses for submission

Guiding Principle 1: A variety of nutritious foods and beverages are the foundation for healthy eating. Health Canada recommends:

- Regular intake of vegetables, fruit, whole grains and protein-rich foods*-especially plant-based sources of protein
- Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat
- Regular intake of water

*Protein-rich foods include: legumes (such as beans), nuts and seeds, soy products (including fortified soy beverage), eggs, fish and other seafood, poultry, lean red meats (including game meats such as moose, deer and caribou), lower fat milk and yogurt, cheeses lower in sodium and fat. Nutritious foods that contain fat such as homogenized (3.25% M.F.) milk should not be restricted for young children.

Evidence Summary for Guiding Principle 1

What this means for Canadians

The majority of Canadians don't eat enough vegetables, fruits and whole grains and many drink beverages high in sugars. This means that most Canadians will need to make different choices to meet these recommendations.

What is needed is a shift towards a high proportion of plant-based foods, without necessarily excluding animal foods altogether. Animal foods such as eggs, fish and other seafood, poultry, lean red meats such as game meats, lower fat milk and yogurt, as well as cheeses lower in sodium and fat are nutritious 'everyday' foods. Some of these protein-rich foods can be high in sodium (e.g., salted nuts), sugars (e.g., sweetened yogurt) or saturated fat (e.g., some meats and many cheeses) and should be limited. They can be identified using the % Daily Value (DV) on the Nutrition Facts table: 5% or less of the %DV is "a little" and 15% or more of the %DV is 'a lot' of sodium, sugars or saturated fat.

A shift towards more plant-based foods can help Canadians:

- eat more fibre-rich foods;
- eat less red meat (beef, pork, lamb and goat); and
- replace foods that contain mostly saturated fat (e.g., cream, high fat cheeses and butter) with foods that contain mostly unsaturated fat (e.g., nuts, seeds, and avocado).

To help meet these recommendations, Canadians can choose nutritious foods and beverages, including:

- foods and beverages that require little or no preparation such as fresh, frozen and canned vegetables and fruit, canned legumes or fish, tofu, plain milk or fortified plant-based beverages;
- foods and beverages that are pre-packaged for convenience (such as pre-washed salad greens, pre-cut fruit) or to increase shelf-life (such as powdered milk);
- foods like nuts, seeds, fatty fish, avocado, and vegetable oils instead of foods like high fat cheeses and cream; and
- Foods obtained through gardening, hunting, trapping, fishing and harvesting.

Plain water is the beverage of choice to help reduce sugars intake and reduce the frequency at which teeth are exposed to sugars.

Do you agree with the following statements about this Guiding Principle? *

Do you agree with the following statements about this Guiding Principle?	Yes	No	Don't know
It is relevant to my work and/or my organization's work.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Don't know
It is clear.	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> Don't know
It provides enough information.	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> Don't know

Recommendation 1: Regular intake of vegetables, fruit, whole grains and protein-rich foods, especially plant-based sources of protein

*Protein-rich foods include: legumes (such as beans), nuts and seeds, soy products (including fortified soy beverage), eggs, fish and other seafood, poultry, lean red meats (including game meats such as moose, deer and caribou), lower fat milk and yogurt, cheeses lower in sodium and fat. Nutritious foods that contain fat such as homogenized (3.25% M.F.) milk should not be restricted for young children.

Do you agree or disagree with this recommendation? * required

Strongly agree

Somewhat agree

Somewhat disagree

Strongly disagree

Don't know

What do you like about this recommendation?

- The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) support the inclusion of plant-based sources of protein-rich foods and feel that providing examples is important. Emphasizing plant based protein sources highlights their importance in a healthy diet and is an affordable protein option for all Canadians.
- This section is good to keep in the evidence section - *a high proportion of plant-based foods, without necessarily excluding animal foods altogether. Animal foods such as eggs, fish and other seafood, poultry, lean red meats such game meats, lower fat milk and yogurt, as well as cheeses lower in sodium and fat are nutritious 'everyday' foods. Some of these protein-rich foods can be high in sodium (e.g., salted nuts), sugars (e.g., sweetened yogurt) or saturated fat (e.g., some meats and many cheeses) and should be limited.*

What do you dislike about this recommendation?

- Emphasizing plant based protein sources highlights their importance in a healthy diet and is an affordable protein option for all Canadians. However, the word '*especially*' should be used with caution to avoid inferring that HC is recommending all people adopt a vegetarian diet. Lean meats, fish and poultry remain healthy choices.
- Suggest adding a definition for whole grains similar to how protein-rich foods are defined.

Additional information should be added to the evidence section for GP1 that acknowledges the impact of food environments on individual food behaviours/choices. While we agree that Canadians need to make difference choices, research indicates that one key element is that food environments need to be more conducive to healthy eating and for our food supply to be more health-promoting ref:

<http://www.annualreviews.org/doi/abs/10.1146/annurev.publhealth.29.020907.090926>>. We recommend that statements that acknowledge the need to make food environments where people live, learn, work and play more supportive of healthy eating is needed for Canadians to be able to make different choices.

- Also in the evidence section, the statement: "*They can be identified using the % Daily Value (DV) on the Nutrition Facts table: 5% or less of the %DV is "a little" and 15% or more of the %DV is 'a lot' of sodium, sugars or saturated fat*" may over emphasis the importance of the Nutrition Facts Table. Not all foods have NFT's, including restaurant-type foods. We also need to ensure that Canadians understand that many healthy protein-rich (and other) foods do not have NFT's because they are fresh and non-packaged (wild game, fish), and may not contain any sugar, fat or sodium.
- Promoting avocados might not be prudent in the following statement - *...replace foods that contain mostly saturated fat (e.g., cream, high fat cheeses and butter) with foods that contain mostly unsaturated fat (e.g., nuts, seeds, and avocado)*. The shift to a plant-based diet must include consideration of the source of foods, and the potential impacts on the food system and the global environment especially for imported foods like avocado.
- **In reference to the following evidence:**

To help meet these recommendations, Canadians can choose nutritious foods and beverages, including:

- *foods and beverages that require little or no preparation such as fresh, frozen and canned vegetables and fruit, canned legumes or fish, tofu, plain milk or fortified plant-based beverages;*
- *foods and beverages that are pre-packaged for convenience (such as pre-washed salad greens, pre-cut fruit) or to increase shelf-life (such as powdered milk);*

- *foods like nuts, seeds, fatty fish, avocado, and vegetable oils instead of foods like high fat cheeses and cream; and*

We want Canadians to increase consumption of V&F and eat less highly processed food. We recognize that encouraging pre-packaged for convenience – instead of encouraging them to make the time to prepare V and F is meeting the population where they are at. Improving food literacy will support Canadians to make healthier choices from foods that are fresh and minimally processed. Including tools and resources for people at various stages of readiness will be important to incrementally improve Canadian's diets. Additionally, repackaged foods are generally more expensive because the cost of cleaning, preparation and packaging is included in the food cost. This may be an option for Canadians with a higher income however, many of our programs and messages are targeted for low income populations.

- **In reference to the following evidence:**

- Foods obtained through gardening, hunting, trapping, fishing and harvesting.

This does not seem to be the right place to just throw in this point. It would seem to be a better fit with any of the three other draft GPs. Referencing wild game or game fish however would be good in the evidence for GP1 and healthy protein choices that do not have a NFT.

Recommendation 2: Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fats

Do you agree or disagree with this recommendation? *required

- Somewhat disagree

What do you *like* about this recommendation?

- OSNPPH doesn't agree with this recommendation. OSNPPH does support HC offering more explicit guidance around fats. However additional clarification is needed.

What do you *dislike* about this recommendation?

- *Saturated* and *unsaturated* should be clarified using 'more often' or 'less often' or 'limit' list of foods and oils and by including examples fatty fish, or giving information about what margarine and butter they should choose, etc.
- Discussion of a specific type of fat necessitates that there is a comprehensive explanation/education about fat and types of fat. This is too specific to include with this GP, and it would likely be included with the GP about processed foods (currently GP2).
- The recommendation for foods higher in saturated fats for certain age groups (for example, higher fat milk for young children) would need to be clarified if this were the guidance statement.

Recommendation 3: Regular intake of water

- **Do you agree or disagree with this recommendation? *required**

- Strongly agree

What do you *like* about this recommendation?

- OSNPPH supports that this recommendation is encouraging people to drink water regularly.

What do you *dislike* about this recommendation?

- We do support regular intake of water for hydration and limiting intake of sweetened beverages.

Is there anything else you would like to say about Guiding Principle 1 and its recommendations?

Guiding Principle 1 is not a guiding principle but instead the definition of healthy eating, and not a qualifying statement that adds helpful meaning and direction.

In contrast to the current wording, the Guiding Principal 1 needs to be much more meaningful and compelling. Canadians are not following the present version of CFG and aren't coming anywhere close to eating healthy. So, radical changes to diets are needed.

What is the intent of the following Guiding Principle - *A variety of nutritious foods and beverages are the foundation for healthy eating*? Since most of it just provides the definition of healthy eating, the only guidance seems to be the one word, "variety". Going on the assumption that variety is the principle being espoused here, that is at least something. However, the points under HC's recommendations don't really connote variety, as their effect is actually to qualify what is included in an optimal healthy eating pattern. If the intent is indeed a principle that defines what is included in healthy eating (i.e. rather than being about variety), then the GP statement should be re-worded to reflect and clarify this.

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) suggests to remove the levels of GP and recommendations and instead provide Canadians with short one line key points/ recommendations that they can relate to, accomplish and work toward. Then provide the explanation and evidence for each key point/recommendation. For example:

Healthy Eating Means:

- Drinking water regularly
- Enjoying vegetables and fruits as much as you can
- Choosing whole grains instead of white or whole wheat
- Eating more plant-based protein rich foods like...
- Listen to your hunger and fullness cues
- Enjoying food with others, when possible
- Making time to prepare food and enjoy food
- ...
- ...

Note: this is not an exhaustive list. Just a few examples.

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?

- Plain language is key
- Visuals are necessary
- Provide clear information on child-portion sizes
- Short and concise key messages work for busy Canadians
- Consideration should be made of new immigrant population languages and need for translation of supporting resources.
- Resources for an aging population are essential (i.e. not just focused on children and families).

Guiding Principle 2: Processed or prepared foods and beverages high in sodium, sugars or saturated fat undermine healthy eating

Health Canada recommends:

- Limited intake of processed or prepared foods high in sodium, sugars or saturated fat
- Avoidance of processed or prepared beverages high in sugars*

* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

What this means for Canadians

The consumption of processed or prepared foods is on the rise in Canada. At least half of the sugars intake of Canadians come from processed or prepared foods and beverages, such soft drinks, sweet baked goods, fruit juice, confectionary, breakfast cereals, and sweetened dairy products. More than three quarters of the sodium Canadians consume comes from processed foods or foods prepared at restaurants. As well, the saturated fat intake of about half of Canadians is too high.

Soft drinks and fruit drinks are main sources of sugars in the diets of Canadians. Avoiding these beverages and other beverages high in sugars can help Canadians cut down on sugars intake. This protects oral health, and may reduce the risk of obesity and type 2 diabetes.

Foods and beverages high in sodium, sugars or saturated fat can be identified using the % Daily Value (DV) on the Nutrition Facts table: 15% or more of the %DV is “a lot” of sodium, sugars or saturated fat.

Do you agree with the following statements about this Guiding Principle? *

Do you agree with the following statements about this Guiding Principle?	Yes	No	Don't know
It is relevant to my work and/or my organisation's work.	Yes	No	Don't know
It is clear.	Yes	No	Don't know
It provides enough information.	Yes	No	Don't know

Recommendation 1: Limited intake of processed or prepared foods high in sodium, sugars or saturated fat

Do you agree or disagree with this recommendation? *required

Strongly agreeSomewhat agreeSomewhat disagreeStrongly disagreeDon't know

What do you *like* about this recommendation?

This recommendation is clear and realistic. It addresses the issue that Canadians are consuming diets high in processed foods, which can negatively impact health and wellbeing. There are two parts to healthy eating – adequacy of diet and moderation of food and beverages associated with the development of mental and physical health problems. It is important to address this aspect.

[Diet Quality in Canada](#) study showed that after consuming the recommended amounts from each food group in the 1992 Food Guide that there were no discretionary calories left for consumption of food and beverages currently classified as “Foods to Limit” by the 2007 Food Guide.

What do you *dislike* about this recommendation?

Moderation needs to be quantified. Otherwise [consumers think that their current consumption of less healthy food and beverages is moderate](#). Vague terms such as limit, moderate, little, etc., do not give a solid basis on which to base food decisions. People have a tendency to be over-optimistic about their personal eating habits, without quantification, people probably won't realize that [about a quarter of what they eat](#) is food and beverages that are not intended to be eaten every day, rather than [roughly five per cent](#), which would accurately reflect moderation. If Health Canada is trying to keep the guiding principles concise, then quantification of these terms should be accounted for in the related tools and resources.

Each food that is encompassed by the recommendation in the description needs to be obvious to the consumer. Otherwise they need to personally investigate what types of food and beverages fall under the processed or prepared higher in sodium, sugars or saturated fat. Again this should be considered when developing related resources.

Similar to saturated fat and sodium guidance, a daily limit for the amount of sugar consumed should be specified in resources. Health Canada currently uses a 100g threshold; will this be updated to align with the World Health Organization's sugar recommendations?

There should be an explicit statement about limiting alcoholic beverages and what this might look like for the average consumer.

Processed meats may be a special case where the limit language still leads to the potential for harm. 50g per day of processed meats increases the risk of some cancers. (http://www.iarc.fr/en/media-centre/pr/2015/pdfs/pr240_E.pdf). It is not a large amount and there could be problems with perception with an unquantified “limit” on processed meat.

Recommendation 2: Avoidance of processed or prepared beverages high in sugars*

* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

Do you agree or disagree with this recommendation? *required

Strongly agreeSomewhat agreeSomewhat disagreeStrongly disagreeDon't know

What do you *like* about this recommendation?

This statement reflects the evidence that these types of beverages contribute more sugar than could be considered moderate, for the average individual. It would be difficult to incorporate them into a healthy eating pattern without sacrificing diet quality.

What do you *dislike* about this recommendation?

A focus on reducing the intake of sugar sweetened beverages is important, but it is also important to limit consumption of beverages that are high in sodium and saturated fat. (e.g., Frappuccinos or high sodium sports drinks).

Guiding Principle 2 and its recommendations

We would now like to ask you for your feedback on this Guiding Principle and its recommendations overall. Here it is again:

Guiding Principle 2: Processed or prepared foods and beverages high in sodium, sugars or saturated fat undermine healthy eating.

Health Canada recommends:

- Limited intake of processed or prepared foods high in sodium, sugars or saturated fat
- Avoidance of processed or prepared beverages high in sugars*

* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

Is there anything else you would like to say about Guiding Principle 2 and its recommendations?

Similar to the provided beverages footnote, it may be beneficial to the end user to include a footnote listing examples of processed or prepared foods high in sodium, sugars or saturated fat.

It may also be helpful to provide a definition of processed and prepared foods, as these terms can be interpreted in many ways.

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?

The term “undermine” is difficult to understand. This should be taken into account when developing resources and tools related to the principle.

Guiding Principle 3: Knowledge and skills are needed to navigate the complex food environment and support healthy eating.

Health Canada recommends:

- Selecting nutritious foods when shopping or eating out
- Planning and preparing healthy meals and snacks
- Sharing meals with family and friends whenever possible

What this means for Canadians

Fewer Canadians are preparing meals from scratch, which involves transforming basic ingredients into complete, culturally appropriate meals. Canadians are also increasingly reliant on convenience foods. The increased use of convenience foods is not always due to limited skills, but also to time constraints, or social and economic considerations.

Planning and preparing healthy meals and snacks at home, and selecting nutritious foods at the grocery store or when eating out, are all skills that can help support healthy eating. Preparing and sharing food brings enjoyment to eating when done in the company of family and friends. Having meals together can help reinforce positive eating habits and help children develop healthy attitudes towards food. It can also be a way for people to take part in food cultures they did not grow up with.

As skills are learned and used, the process to select, plan and prepare meals can become less time-consuming and more routine. Building a foundation of knowledge and skills can contribute to improved food choices at any age and can help support life-long healthy eating habits.

Understanding where food comes from and how it is prepared can support more mindful eating practices. These practices include things such as taking time to eat and savour every bite, paying attention to feelings of hunger and fullness, eating slowly with enjoyment, and avoiding distractions while eating.

Do you agree with the following statements about this Guiding Principle? *

Do you agree with the following statements about this Guiding Principle?	Yes	No	Don't know
It is relevant to my work and/or my organization's work.	Yes	No	Don't know
It is clear.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Don't know
It provides enough information.	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> Don't know

Recommendation 1: Selecting nutritious food when shopping or eating out

Do you agree or disagree with this recommendation? *required

☒ Strongly agree
 ☐ Somewhat agree
 ☐ Somewhat disagree
 ☐ Strongly disagree
 ☐ Don't know

What do you *like* about this recommendation?

- The addition of "eating out" to the updated guidance as it was not included in the previous food guide, and is a reality for most Canadians.
- It acknowledges that Canadians eat out frequently and are making food choices in various environments; and that it is important to be able to navigate through the options available and supported in making the most nutritious choices.
- It recognizes that Canadians will require support to assist them in making healthy eating decisions at point of purchase (e.g., food labels, point of purchase information, calorie requirements on menus, etc.). It is important to have policies and regulations to support this.
- Creates an opportunity to advocate for more information on menus, as current calorie information is not sufficient to support an informed nutritious/healthy eating decision. The opportunity to advocate for clear, more user friendly information on food labels is also needed.

What do you *dislike* about this recommendation?

- It is a downstream recommendation to promoting health as it places the responsibility on Canadians to make the best decisions, rather than acknowledging that Canadians are influenced by their built environment, and many other factors.
- Health promoting environments where the healthy choice is the easy choice would make it more effortless for Canadians to select healthy food when eating away from home.
- Making healthy choices at the grocery store is very different than trying to make a healthy choice at a restaurant. Restaurant meals do not come with complete food labels. Important to provide specific guidance for both settings.
- There is a lack of understanding and various interpretations in today's food market about what is considered "nutritious" vs what is considered "healthy". Are the terms meant to be used interchangeably? If so, it would be helpful for them to be clearly defined in the context of the Healthy Eating Strategy. There is a definite need for knowledge and skills to support an understanding of what "nutritious" means. Health Canada needs to include clearer guidance around this.
- Any tools created by Health Canada need to be easy to understand, access, apply, and should be well promoted to consumers. Consumers should not have to struggle to interpret complex nutrition information when selecting healthy foods.
- The guideline may seem simple, however it is often easier said than done and making healthy choices depends on many of the social determinants of health and It will be a challenge to achieve this guideline without appropriate policies to ensure that the healthy choice is the easy choice.

Recommendation 2: Planning and preparing healthy meals and snacks

Do you agree or disagree with this recommendation? *required

☒ Strongly agree
 ☐ Somewhat agree
 ☐ Somewhat disagree
 ☐ Strongly disagree
 ☐ Don't know

What do you *like* about this recommendation?

- It emphasizes a need to move away from highly processed foods (i.e. food with minimal nutritional value) and restaurant meals
- It includes snacks in addition to meals, as Canadians seem to be increasingly snacking. Creates an opportunity for integrating more nutritious snacks (e.g., vegetables, fruits) and shifting away from more of the conventional highly processed snacks.
- It places emphasis on the importance of food literacy. Food literacy is a set of interconnected attributes including food and nutrition knowledge; skills in food preparation; the confidence and self-efficacy to apply the knowledge and skills to influence dietary behaviour; and access to resources (e.g., adequate income, housing, food, equipment, learning opportunities, social support, and a healthy and sustainable food system). (reference: <https://www.cambridge.org/core/journals/public-health-nutrition/article/identifying-attributes-of-food-literacy-a-scoping-review/C3F11D5A8B8E5525947BA261338658BA#fndtn-information>)
- Opportunity for getting children excited about cooking and healthy foods – making it fun.
- Opportunity to collaborate with food industry to support creation of more "healthy" products.
- Opportunity for promoting more local and seasonal foods.

What do you *dislike* about this recommendation?

- "Healthy" can be defined very differently. There is a need to operationalize definitions that Canadians will understand and offer some flexibility regarding where Canadians are starting from.
 - As it is challenging to define "healthy" – wondering if this recommendation can be reframed to: Planning and preparing meals and snacks, following the food guide recommendations
- Important to provide detailed information to Canadians on how to plan and prepare healthy meals. Will Health Canada do this?
- Policy and food literacy are needed to enable this recommendation to occur.

Need more emphasis on the importance of cooking – what does it mean to prepare a meal and snack?

<https://www.cambridge.org/core/journals/public-health-nutrition/article/identifying-attributes-of-food-literacy-a-scoping-review/C3F11D5A8B8E5525947BA261338658BA#fndtn-information>

<https://www.osnpph.on.ca/upload/membership/document/foodliteracy-flyer-final-ps.pdf#upload/membership/document/foodliteracy-flyer-final-ps.pdf>

<https://www.osnpph.on.ca/upload/membership/document/food-literacy-study.ldcpontario.final.dec2013.pdf#upload/membership/document/food-literacy-study.ldcpontario.final.dec2013.pdf>

- Social determinants of health, access to food options (based on where they live in Canada and many other factors), food literacy and activities of daily lives also have an impact on accomplishing this recommendation – would be important to acknowledge that.

Recommendation 3: Sharing meals with family and friends whenever possible

Do you agree or disagree with this recommendation? *required

☒ Strongly agree ☐ Somewhat agree ☐ Somewhat disagree ☐ Strongly disagree ☐ Don't know

What do you *like* about this recommendation?

- Reinforces the importance of taking the time to eat and enjoy food as well as the meal-time experience which is not solely focused on the food being consumed but integrates factors such as relationship building.
- Supports eating/food related role modelling from various aspects – child/ adult; child/child; different culture/ different culture.
- It takes a broad focus in relation to the fact that this can occur in various settings and not just in the home; as the reality is many Canadians are eating outside of the home.

What do you *dislike* about this recommendation?

- Although it includes the acknowledgment of flexibility ("whenever possible"), not everyone can regularly share meals with family and friends and this may create a feeling of guilt. It may be useful to include the caveats of why people are not able to regularly eat together.
- Sometimes people may have an opportunity to eat with folks other than family and friends e.g. colleagues, classmates, co-workers, fellow residents, etc. Perhaps it should emphasize "eating with others".
- Add the benefits of eating together – would be more clear and it's important to communicate these, as they could help support buy in.
- This is based on research around families that cook together will eat together, and therefore a good strategy to encourage Canadians to cook. However, some families/ individuals may not be able to relate to this with busy lifestyles, kids' activities, different work schedules, etc. There is the potential to make some feel guilty, and attempts should be made to avoid unintended negative consequences.
- This could be broadened to somehow include the negative consequences related to social isolation and nutritional status as the population ages rather than seeming to focus on a family unit (especially since there are more people over age 65 than under age 15. Ref: <http://www.statcan.gc.ca/daily-quotidien/170503/dq170503a-eng.htm?HPA=1>)

Guiding Principle 3 and its recommendations

We would now like to ask you for your feedback on the Guiding Principle 3 and its recommendations overall. Here it is again:

Guiding Principle 3: Knowledge and skills are needed to navigate the complex food environment and support healthy eating.

Health Canada recommends:

- Selecting nutritious foods when shopping or eating out
- Planning and preparing healthy meals and snacks
- Sharing meals with family and friends whenever possible

Is there anything else you would like to say about Guiding Principle 3 and its recommendations?

- Pleased to see the acknowledgement that the food environment is complex included.
- Canadians need support in acquiring food literacy and food skills. Supports needed -- include better integration of food literacy and cooking skills into school curriculums, legislation limiting marketing to children and youth, regulatory guidance around un-healthy food additives (e.g. Trans-fats, added sugars, sodium), etc.
- This guiding principle creates an opportunity for advocacy.
In the section "What this means for Canadians":
- As skills are learned and used, the process to select, plan and prepare meals can become less time-consuming and more routine.
 - Social determinants of health, food access and food insecurity are tremendously impactful in this area, and skill may be irrelevant in many of these situations. This is not acknowledged in this section.
- Understanding where food comes from and how it is prepared can support healthy eating behaviours which may include things such as taking time to eat and savour every bite, paying attention to feelings of hunger and fullness, eating slowly with enjoyment, and avoiding distractions while eating.

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us?

- Integration into the school setting – in the curriculum will support recommendations #1 and #2, and #3 could be supported by eating together with their peers. A national school food program would support all children and families with this guiding principle, as the "nutritious" food could be offered to all and the eating with friends would be promoted from a very young age.
- For individuals who are food insecure there are often other priorities for their finances (e.g., rent) and these messages may not be most appropriate depending on where food is being accessed (e.g., food bank, shelter, convenience store).
- Need to be sensitivity to various populations, cultural needs, and consideration of the social determinants of health.
- Marketing to kids – kids are influenced by marketing everywhere (not just on TV); alignment with federal consultation and actions in this area is needed

CFG Consultation—Considerations

Do you agree or disagree with these considerations?

Determinants of Health – Strongly Agree

Cultural Diversity--Strongly Agree

Environment – Strongly Agree

What do you like about these considerations?

General comments

All good considerations to include.

Determinants of Health

- It is essential to consider the Determinants of Health in making healthy eating recommendations for Canadians
- It is stated upfront that, “Food choices are not simply a matter of personal choice.”
- There is acknowledgment of the need to prevent health inequities with the statement, “...to avoid increasing unfair and avoidable differences in health status.”

Cultural Diversity

- Recognition that inclusion of different foods from different cultures can support healthy eating.
- Recognition of the vast diversity with over 200 different ethnic groups
- Specific mention of indigenous peoples and traditional foods.

Environment

- Reference to potential impacts of food system on the environment
- Including the estimated value of food loss/waste in Canada; it would be good to emphasize that there needs to be much more efforts towards prevention of food waste/loss through all parts of the food system

What do you dislike about these considerations?

General comments:

Concept of equity is not explicitly addressed in the considerations and should be added – it is not the same as inequality. Ref: <http://nccdh.ca/resources/glossary/>.

Not sure of intended purpose. Very vague, not sure how these few statements will be incorporated into dietary guidance.

Not clear to whom the considerations are going to be directed – these should be developed for system/policy level application and related messages could be developed for consumers

Determinants of Health

- Not enough detail (e.g., definition, examples) on the Determinants of Health; suggest providing additional information such as:
 - Determinants of Health are the best predictors of health for individuals and populations
 - Examples of some of the DOH: income and social status, education, employment, housing, physical environment, social support networks, gender, biology and genetics
- The term ‘access’ in the statement, “...factors that influence our ability to make healthy food choices, including **access** to and availability of nutritious foods...” does not differentiate between

physical (geographic) access and economic access to food. Given that in 2012, 4 million individuals in Canada experienced some level of food insecurity (inadequate or insecure access to food due to financial constraints), it is imperative to acknowledge income as a key determinant of health particularly when it comes to healthy eating recommendations. [Reference: Tarasuk V, Mitchell A, Dachner N. (2014). Household Food Insecurity in Canada, 2012. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from:

[http://proof.utoronto.ca/resources/proof-annual-reports/annual-report-2012/.](http://proof.utoronto.ca/resources/proof-annual-reports/annual-report-2012/)]

- The statement, “Health Canada’s proposed healthy eating recommendations are based on the best available evidence, while considering that healthy choices can be **affordable**...” presumes that all Canadians have adequate food budgets within which to make food choices consistent with healthy eating recommendations; however, this is not the case for a significant proportion of the Canadian population as referenced above.
- The statement, “For example, a range of nutritious foods form the foundation of healthy eating: frozen, packaged and canned products are convenient and nutritious options, especially when fresh food is out of season, more costly, or unavailable” presumes that while these less expensive processed forms of food are less costly that they are ‘affordable’ which is not the case for a significant proportion of the population. This statement is not an appropriate discussion point for the Determinants of Health consideration.

Cultural Diversity

- There should be an additional statement that addresses the underlying issue, still comes down to processed vs whole foods, whole unprocessed or minimally processed foods from any cultural background support healthy eating while ultra processed foods from various cultures do not.
- In the past the food guide has incorporated a variety of cultural foods as examples within the food guide, and we suggest keeping these visuals. Also, suggest considering different tools for different cultures be more tailored than translation aimed for cultural adaptation.

Environment

- There should be an additional statement that addresses the need to work towards a sustainable food system that minimizes negative impact on the environment while enhancing healthy, nutritious eating patterns and food choices – not just with respect to food waste.
- The sentence, “...diets higher in plant-based foods and lower in animal-based foods are associated with a lesser environmental impact, when compared to current diets high in sodium, sugars and saturated fat” is not as clear as it could be – perhaps it would be better to state that eating diets with less ultra-processed food (more whole foods) is better for the environment or are more environmentally sustainable.
- The sentence, “The application of skills, such as planning meals and food purchases can also help decrease household food waste” could be stated more clearly; for example, “Using food skills, such as planning food purchases, meal planning and how to use leftovers can help prevent food waste at home.”