



Frances Gélinas, MPP  
Room 186, Main Legislative Building,  
Queen's Park  
Toronto, Ontario  
M7A 1A5

February 28, 2014

**RE: Bill 149, Health Statute Law Amendment Act (Healthy Decisions Made Easy),  
2013 - Menu Labelling Legislation**

Dear Mme Gélinas:

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) wishes to congratulate your leadership on this important food policy issue. Menu labelling is an important part of creating healthier eating environments for Ontario's families who are increasingly relying on snacks and meals prepared outside the home by restaurants and similar foodservice establishments.

OSNPPH is the independent and official voice of over 200 Registered Dietitians (RDs) working in Ontario's public health system. OSNPPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents.

OSNPPH supports menu labelling as a population health strategy that will allow consumers to make informed choices. In our [Position Paper](#), OSNPPH makes recommendations based on emerging best practices for menu labelling. We are pleased to learn that many of these emerging best practice recommendations have been incorporated into Bill 149, Health Statute Law Amendment Act (Healthy Decisions Made Easy), 2013. Most notably, that Bill 149 includes requirements for posting of both calories and sodium on menus.

However, OSNPPH recommends that legislation require the listing on menus of sodium content information, similarly to that for calories, to make this information more apparent and accessible to Ontarians.

Therefore, we ask you to reconsider the use of flags or warnings to signify food and drink items that are 'high' or 'very high' in sodium.

Our recommendation is based on an analysis of Canadian restaurant chain menus, which found that the majority of menu items contain high levels of sodium. The use of flags, or



warnings would not allow consumers to differentiate between something that is just above the threshold and something that is higher. Furthermore, because most items would carry warnings, consumers wouldn't have a choice, and restaurateurs might not see any incentive in lowering sodium content if this wouldn't take their items below the warning threshold.

An additional recommendation is that statements of reference values be required, such as, "The average adult should consume about 2000 kcal and 1500 – 2300 mg of sodium per day". Reference values would put the calorie and sodium content of menu items in the context of daily needs/limits and therefore support consumers' understanding and use of nutrition information on menus.

Clear and accessible information about the nutritional content of foods is needed to promote individual and population health, to mitigate the effects of unhealthy food environments and support prevention of dietary risk factors for obesity and chronic diseases. Well-crafted menu labelling legislation can be a meaningful contributor to these objectives.

Sincerely,

Heather Thomas RD, PhD  
Public Health Dietitian  
Co-Chair Year 2, OSNPPH

Rebecca Davids, RD, MSc  
Public Health Nutritionist  
Co-Chair Year 1, OSNPPH

CC:

Deb Matthews, Minister of Health and Long-Term Care  
Kate Manson Smith, Assistant Deputy Minister, Ministry of Health and Long-Term Care  
Michael Coe, Senior Policy Analyst, Ministry of Health and Long-Term Care  
Linda Stewart, Executive Director, Association of Local Public Health Agencies (alPHA)  
Pageen Walsh, Executive Director, OPHA  
Dr. Valerie Jager, Chair, COMOH  
Heather Manson, Public Health Ontario  
Pat Vanderkooy, Dietitians of Canada