

## Technical questionnaire on the prohibition of partially hydrogenated oils

Health Canada values the input Canadians and interested and affected stakeholders have on its proposed policies. We welcome your comments and feedback on the proposed approach to prohibit the use of partially hydrogenated oils (PHOs) in foods.

For more information, refer to the [consultation document](#) on the prohibition of PHOs in food.

Now that you have had a chance to consider the information above, please consider taking the time to answer some questions below.

1. Do you support Health Canada's proposal to prohibit the use of partially hydrogenated oils in foods? Please explain.

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) is the independent and official voice of 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.

Yes, OSNPPH supports Health Canada's proposal to prohibit the use of partially hydrogenated oils (PHOs) in any food sold in Canada.

PHOs are the main source of industrially produced *trans* fat in foods and as a result, their consumption increases the risk of coronary heart disease (CHD). Prohibiting the use of these oils in foods would improve the nutritional quality of Canada's food supply and result in an overall reduction in CHD risk for the population.

To date, Canada has pursued many approaches (including setting **voluntary** targets for maximum *trans* fats in processed foods) to reduce the levels of industrially produced *trans* fat in the food supply. And although some progress has been made, there are some food categories that continue to contain *trans* fats at high levels. In order to lower these levels and help create a food supply that will enable Canadians to limit their *trans* fat consumption, **regulatory** measures such as this proposed prohibition are needed.

OSNPPH supports a regulatory approach to PHOs as we believe it will:

- be the most effective means to reduce *trans* fat in the Canadian food supply,
- promote the development of more healthful alternatives to PHOs at the national level,
- level the playing field for all food industry players, and
- ensure that all Canadians benefit, particularly those at the highest consumption levels.

In implementing a PHO prohibition, it is important that Health Canada and the Canadian Food Inspection Agency take the following into consideration:

- **Monitoring and enforcement**
  - Ensure that all food manufacturers preparing food for sale in Canada adhere to the amended *Food and Drug Regulations*.
- **Health consequences of PHO alternatives**
  - Ensure that PHO alternatives are safe to consume and that their consumption does not result in negative health consequences.
  - As saturated fats tend to be cheaper than unsaturated ones and also provide similar properties to *trans* fats (e.g., increased shelf life, texture), it is likely that manufacturers will choose to replace PHOs with saturated fats. Therefore Health Canada should recommend that unsaturated fats, rather than saturated fats, be used as replacements for PHOs and/or that Government of Canada consider helping to lower the cost of unsaturated oils so they are the same price or less than unhealthier saturated oils.
- **Environmental consequences of PHO alternatives**
  - Ensure that PHO alternatives are sustainable and do not result in the exploitation of local communities
  - For example, increases in global demand for palm oil are driving forest clearance in the tropics due to monoculture and are linked with abuses of human rights [http://www.unep.org/pdf/Dec\\_11\\_Palm\\_Plantations.pdf](http://www.unep.org/pdf/Dec_11_Palm_Plantations.pdf)
- **Labelling of Partially Hydrogenated Oils**
  - Ensure that labelling regulations do not allow manufacturers to disguise the use of partially hydrogenated oils by being able to declare them using other terms (e.g., modified oils, hydrogenated oils) in the list of ingredients.
- **Food prices**
  - Determine whether a PHO prohibition will affect food prices and if so, whether certain subgroups of the population will be disproportionately affected.

2. Do you have any comments/concerns with the proposed definition for partially hydrogenated oils? Please explain.

Although commenting on the specific definition for PHOs is outside the scope and expertise of public health, OSNPPH supports the fact that Health Canada's proposed definition reflects the PHO definition used by the US Food and Drug Administration in their "Final Determination Regarding Partially Hydrogenated Oils".

OSNPPH recommends that, as hydrogenation technology evolves, the definition of PHO be reviewed and revised as necessary to ensure that the industrially-produced *trans* fat content in the food supply is kept to a minimum.

For the purpose of consumer communications related to this proposed policy, OSNPPH recommends that the term “artificial *trans* fat” be used instead of “industrially-produced *trans* fat” as the former is shorter and easier to read.

3. Do you have any comments/concerns with the proposed transition period of 12 months following adoption into regulation of the prohibition? Please explain.

OSNPPH supports the proposed 12 month transition period. Considering the negative impact that PHOs have on the health of Canadians and that the food industry has been called on, since 2007, to reduce the *trans* fat content of food, we feel that the transition period should be as short as feasibly possible.

In conclusion, OSNPPH commends Health Canada for taking this step to prohibit PHOs and reduce the *trans* fat levels in our food supply. We also encourage Health Canada to consider additional policy approaches (e.g., banning all oil processing techniques that produce industrial *trans* fats, banning or setting very low limits on the presence of industrial *trans* fats in food products) to further reduce the level of unhealthy *trans* fats in the Canadian food supply.