



September 1st, 2017

Hon. Ginette Petitpas Taylor
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Petitpas Taylor,

Re: *Beef Farmers of Ontario's Comments on Canada's Food Guide – Public Consultation*

On behalf of Beef Farmers of Ontario, I am writing to express our concern with the proposed principles and recommendations for Canada's Food Guide. The Beef Farmers of Ontario (BFO) represent 19,000 beef producers across Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

We believe that the proposed revisions to the Food Guide, if implemented as proposed, will mislead Canadians with respect to the inclusion of meat as part of a healthy diet, and perpetuate misinformation on the environmental impacts of beef production.

The Food Guide's references to consuming meat should be framed in a more positive context, explaining that, when eaten in appropriate amounts and prepared properly, the inclusion of meat can be an important part of a healthy balanced diet. It must also be explained that the consumption of beef provides an excellent source of essential nutrients that many Canadians are lacking, according to the 2015 Canadian Community Health Survey.

Canadians need to be informed that while they will benefit from eating more vegetables and whole grains, they will also benefit from eating higher levels of meat and other animal-based proteins.

Our enclosed comments discuss two main recommendations that the Food Guide must address:

1. Recommendations around the consumption of meat and animal-based proteins must be framed in a balanced and fair manner using science-based evidence.
2. Environmental considerations should focus solely on reducing food waste.

Section 1: Recommendations around the consumption of meat and animal-based proteins must be framed in a balanced and fair manner using science-based evidence

We are concerned that the recommendation to eat less meat will negatively affect Canadians' diets. The average Canadian is already deficient in protein according to prescribed daily recommendations, which



is especially concerning for young children, women and seniors. On average, Canadians are not consuming the recommended serving of red meat within the current Canadian Food Guide guidelines.

We believe that the proposed recommendation to eat less meat is not well-founded. In the open letter in response to the Food Guide consultations from the group of Canadian Physicians and Allied Health Care professionals representing 2,600 Canadian clinicians, states, “by including cautions against red meat, you are relying on epidemiological, or associational, studies. These do not stand up to more rigorous clinical trial data which does *not* demonstrate any negative health consequences from eating meat”.¹ The coalition of health care professionals goes on to suggest that Food Guide recommendations should “stop steering people away from nutritious whole foods, such as whole-fat dairy and regular red meat”.²

Red meat is an excellent source of protein and other essential nutrients, and it is low in calories when eaten in appropriate amounts. Eating red meat as part of a variety of protein sources is important in many healthy diets, as it is one of the most accessible ways for the human body to obtain essential nutrients.

For example, preliminary results from the University of Alberta’s “Why Act Now” project, with 557 youth in Edmonton of Indigenous, African, Asian and European descent and aged 11-23 years, showed that significant percentages of youth are not meeting important nutrient requirements. This includes B12 (29-40% are not meeting the nutrient requirement), zinc (45-52%), selenium (13-23%), B6 (33-39%), iron (17-24%), and magnesium (62-74%).³ Meat is rich in these nutrients, which are essential for growth and development.

Dietary Reference Intakes are needed to maintain adequate nutrition for good health. For youth not meeting the recommendations, there can be long-term consequences of dietary deficiencies for the nutrients listed above. The easiest way to address nutritional deficiencies would be to replace non-nutrient-dense foods with foods that are nutrient dense, such as meat. We are concerned that any recommendation that suggests a movement away from meat or other animal-based protein will lead to increased nutrient deficiencies.

It is well acknowledged that replacing animal protein with plant protein is not a simple undertaking. All proteins are not created equal – animal proteins contain higher amounts of essential nutrients that are easily accessible compared to plant-based proteins. Eating lean meat in moderation is an effective way to access important nutrients such as protein, iron, and B vitamins, often with lower caloric intake.

- **BFO recommends that the meat recommendation be reframed to state, “*eat lean meats in moderation as part of a healthy diet*”**

Section 2: Revise the proposed environmental considerations to focus solely on reducing food waste

The Food Guide should not include recommendations to reduce meat consumption based on perceived environmental benefit. To make this recommendation represents a simplistic approach to a very

¹ Open letter to Health Canada on Canada’s Food Guide, submitted July 24, 2017 on behalf of the group of Canadian Physicians and Allied Health Care professionals

² Open letter to Health Canada on Canada’s Food Guide, submitted February 22, 2017 on behalf of the group of Canadian Physicians and Allied Health Care professionals

³ Results provided by Dr. Sangita Sharma, University of Alberta, through the Canadian Cattlemen’s Association



complex issue, and given the absence of appropriate context, serves to perpetuate misinformation about the environmental footprint of beef production.

A healthy agricultural landscape includes the integration of both crops and livestock. Although livestock products may have a higher environmental footprint in some areas, they can also have significant environmental benefits. Pasture and forage land managed by beef farmers do more than produce beef – these grasslands play an integral role in soil health, carbon sequestration, biodiversity, nutrient run-off management, erosion control, and pollinator and wildlife habitat.

To suggest that the environmentally conscious option is to eat less beef is incorrect. Losing the land that produces beef – pasture and forage land – would do great environmental harm in Canada.

Moreover, we do not believe the role of Canada's Food Guide should include the development of recommendations focused on addressing environmental priorities, especially regarding food production (as opposed to food preparation). Encouraging Canadians to make food choices based on the environmental impact of food production is inappropriate and unrealistic, partly due to the lack of knowledge that so many Canadians have regarding agriculture and the environmental footprint of different foods, and the plethora of misinformation and false claims the public is exposed to through different mediums. Recommendations surrounding the environmental impacts of food production are best left to Canada's Food Policy, where this complex issue can be appropriately assessed and researched in greater detail.

- **BFO recommends that the Food Guide eliminate all recommendations calling for a reduction in meat consumption based on perceived environmental benefit**

Reducing food waste is a high-impact way for Canadians to protect the environment through their food choices.

- **BFO recommends removing the proposed environment section from Canada's Food Guide, and instead include recommendations to reduce food waste.**

In conclusion, BFO encourages further adaptation of the current draft of the Food Guide's principles and recommendations. Canadian and Ontario beef is a sustainable, locally grown and nutrient-dense food that many Canadians enjoy as part of their varied diets.

We appreciate the opportunity to contribute to the discussions on Canada's Food Guide and look forward to future opportunities to engage on this subject.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors
The Honourable Minister MacAulay
The Honourable Minister Leal
The Honourable Minister Hoskins

