



April 22, 2006

**Response of Consumer Interest Alliance Inc. to Health Canada's
"Review of Canada's Food Guide to Healthy Eating"**

SCOPE

The Consumer Interest Alliance Inc. (CIAI) is providing comments on the present stage of the revision to *Canada's Food Guide* as a whole, together with some specific consultation questions. These comments are in response to the web-based online consultation that ended on March 24, 2006.

FUNDAMENTAL POINTS

CIAI notes the principles used for the Food Guide update and CIAI has used those as the basis for these comments. The principles are:

The process will be

- open and transparent;
- based on up-to-date evidence; and
- linked into public health priorities and initiatives.

The product will

- describe a pattern of eating to meet nutrient needs, promote health and minimize risk of nutrition-related chronic disease; and
- be useful to public, i.e., easily understood and implemented.

Canada's *Guidelines for Healthy Eating*, which is for healthy Canadians over two years of age, was last updated in 1992, and had the key messages

- Enjoy a variety of foods.
- Emphasize cereals, breads, other grain products, vegetables and fruit.
- Choose lower-fat dairy products, leaner meats and food prepared with little or no fat.
- Achieve and maintain a healthy body weight by enjoying regular physical activity and healthy eating.
- Limit salt, alcohol and caffeine.

CONCERN OVER NEED TO LIMIT OUR COMMENTS

CIAI finds significant limitations to the present public process objectives of being “open and transparent” and “based on up-to-date evidence.” The resources that you provide lack citations and directly relevant background documentation. That documentation is necessary to meet the stated principles of the process, so providing confidence that the new guide will provide Canadians with the best available advice in a suitable format.

For example, the materials include *Revision of Canada's Food Guide to Healthy Eating Modelling of Food Intake Patterns* (November 2005), which states that the food intake patterns contribute to reduced risk of chronic disease, but no evidence is provided. Similarly, the evidence used to develop food intake patterns should be provided. The summary report is not comprehensive enough to understand either the rationale or the process used and the scientific questions should be open for review and discussion in this stage of the public consultation process.

It should be noted that when the USA Dietary Guidelines were published, a detailed rationale and appropriate scientific evidence were readily available,¹ together with background documents from an expert committee.²

COMMUNICATIONS METHODOLOGY

Prior to finalizing the Food Guide, Health Canada should provide additional information about the communication package and methodology. CIAI has concerns about possible gaps in the proposed stand-alone consumer handouts. While those gaps may be covered in the planned print and electronic resources for educators and communicators, concerned and

¹ *Guidelines for Americans, 2005*, U.S. Department of Health and Human Services, U.S. Department of Agriculture, at www.healthierus.gov/dietaryguidelines, or www.health.gov/dietaryguidelines/dga2005/document, 2005, 84 pages.

² See www.health.gov/dietaryguidelines/dga2005/report/

interested consumers should have “second level” resources beyond that provided in the present Food Guide print material. That should include the scientific evidence and rationale used for the “tips” listed in each section, together with the evidence behind the development of the “top ten tips.” Those resources should be based on focussed testing with all messages.

GENERAL COMMENTS

General Design Features

CIAI has reviewed the publication “Healthy Eating Consumer Perspectives – Summary Report” (Health Canada, 2003), and as a result we suggest that revisions will be required for the visual depictions to be used in the new guide.

While it is clear that Health Canada is committed to the rainbow design, CIAI feels that it has significant limitations for a visual of grouping within the four major product groups of “Grain products,” “Fruit and vegetable,” “Milk products,” and “Meat and alternatives.” In addition, the research conducted for Health Canada suggests that many consumers tend to overlook specific food groups, namely milk and grain products. There is relevant research that demonstrates a notable difference between readers and users liking a visual and their understanding what it is supposed to convey. Unlike the new USA MYPYRAMID or the older Canada’s Food Rules circle, the Canadian rainbow format does not provide a visual understanding of the four groups and the relative contribution in servings that each group should make. CIAI suggests that Health Canada pre-test the new rainbow design to ensure that consumers ‘get the message’ and that its design complements the concepts in the Guide.

The guide information set should also provide for people with higher and lower than average nutrition needs within the broad gender/age categories. CIAI proposes that the USA food MYPYRAMID plan is a model that should be explored, as it provides for smart choices from every food group. It is possible to use MYPYRAMID to balance physical activity and calories, and to balance food and nutrition. Canada's new guide should have similar options.

Within the Canadian draft guide, the “tips” for some food groups are not specific enough to provide meaningful guidance and, as a result, such generalities are likely to be unhelpful. Again, a review of the USA MYPYRAMID information and tips for each of the food groups would be a useful place to start; they are specific and help consumers make wise choices, such as those to guide consumers to eat more vegetables and make wise choices in the milk group.

Typography Design Elements

Design elements prompt the question “It may look pretty, but can we read it?”, and even “If we cannot read it, how can we understand?”

Optimal typographical design should be used in the development of the format and printing of the new Food Guide. The use of **ALL CAPS** and **reverse print**, as well as some of the suggested colour juxtapositions, will have significant impact on the ease of reading. All materials need to be evaluated using tools such as the “Zone of Optimal Typography³.”

In addition, CIAI proposes that the design should be based on consumer testing that probes the connection between the visual and the understanding of the message. For example, how do the proposed formats contribute to the consumer's interpretation of the guidelines and ability to make informed food and nutrition decisions?

Choice of Food Pictures

Pictures and drawings should be chosen so that the reader can directly interpret the intended message. These illustrations should perhaps be more realistic/photographic than representational, so providing better communication. For example, in the present guide, the chicken leg looks breaded and fried: Is that a preferred message?

Food choices should be economical and available. For example, a T-bone steak is a poor representation of red meat, and is larger than a single serving. Similarly, fruit, should be inexpensive and widely available in most areas of Canada; apples and pears are eaten by most ethnic and cultural groups, but they are missing.

Communication Campaign Suggested

A 2- or 8-page consumer guide is not and cannot be the most important component for providing dietary education or inducing dietary change. CIAI feels that it can only be a part of a co-ordinated set of information with long-term public policy intent. The new Food Guide should be a component of a larger initiative that will assist consumers in making wise food choices. There is much research, including that by Health Canada, showing that food choice is a complex and hard to understand process. An effective education campaign is required, placing food within a healthy lifestyle, making balanced and nutritious menus, as

³ Sutherland S., “Miles Albert Tinker and the Zone of Typography,” PhD Thesis, University of Washington, Washington, 1989.

well as the selection and purchasing food, and its preparation and storage.

CIAI proposes that the messages must be practical and specific, answering the three questions: What? How? and Why?

For example, consumers need information on why foods from a specific food group are an important part of their diet, and so support their movement from contemplation to action. Likewise, information from Dietary Reference Intakes (DRI) and the need to balance various food selections to meet indicated DRIs will answer the “how”, while a “why” is answered by the explanation of the need to balance intake(s) with activity level, age, health risks, etc..

Other Messages

Consumers need information on how mixed, or multi-ingredient, dishes fit into the Food Guide. Tips on eating out, the implications of “traditional fast food” versus “other choices” are also important. The USA MYPYRAMID has some useful practical messages for that important component of the diet of much of the population.

It should be made clear that the Food Guide is not a therapeutic diet for any specific health condition. There needs to be reinforcement of the message that individuals who have a chronic health condition, or food allergies that limit their food choices, should consult with a health care provider for advice on their appropriate dietary pattern.

Energy Balance

CIAI also suggests that there is a need to develop and provide appropriate emphasis for the concepts of “energy in from food” and “energy used by physical activity.” The guide does not adequately address the idea of discretionary calories or how to identify the many everyday foods that are calorie dense, but nutrient poor. While consumers may think in terms of calories, they should also think and act on nutrition.

FOOD GROUPS

Milk products

The World Health Organization has commented that it is the food itself and not the specific nutrients in the food that contributes to the health promoting aspects of the food. This is particularly true for milk.

CIAI objects to the proposed addition of soy-based beverages to the milk products group unless proper research can be provided to substantiate its equivalency. The nutritional

profile of soy beverages is different from the nutritional profile of milk products. There is no standard of identity for soy-based beverages in the Food and Drugs Regulations and the nutrient profile varies significantly by manufacturer. Putting soy beverages in the milk products group will lead consumers to believe, inaccurately, that they were getting calcium and nutritional values equivalent to milk. Calcium from soy beverages is less bioavailable than calcium from cow’s milk (for a calcium-fortified soy beverage, calcium is only about 70% as available as that from milk).

In addition, there has been considerable discussion around the use of soy-based formulas for infants, resulting in an advisory from Health Canada discouraging the use of soy-based products for infants. The issue is the bioactive substance phytoestrogens: what level is safe for young children and adolescents? Research shows that consuming soy beverages above the level recommended in the proposed food guide provides enough phytoestrogens to change the menstrual cycle of women.

For those who cannot consume milk, there is a need to find alternative sources of calcium, magnesium, potassium, riboflavin and other components. At present, there is no reason to include those soy-based, supplemented drinks within the “milk group”. CIAI feels that it is inappropriate to advocate for these beverages (they are not milks) among the choices that are available, which include mineral supplements from pharmacies.

It should be noted that there is confusion caused by these “non-milk” product marketing practices. CIAI has carried out research⁴ that looked at cheese standards, during which consumer focus group participants clearly stated that only cheese made from milk should be called “cheese,” and that soy products must not be labelled “cheese.” The participants thought that the “cheese” designation of a soy-based product was misleading as some had purchased the product thinking that it was milk-based.

Grains

Consumer research in Canada suggests that many Canadians think of grains as carbohydrates. This leads CIAI to question the message of the guide “Make half your choices whole grain,” for which the corollary is “Make half of your choices refined grains.” We therefore suggest that the phrase be changed to “Choose whole grain most of the time.”

⁴ “*Cheese Standards and the Consumer Interest*,” Consumer Interest Alliance Inc. for the Dairy Farmers of Canada, Ottawa, July 2005.

This issue should be considered in the light of increasing evidence that consumption of refined sugars and starches is contributing to the obesity epidemic in Canada and other countries.

Fruits and Vegetables

Not all fruits and vegetables are the same. The concept that the energy value of a serving of some vegetables is twice that of others is important. Different fruits and vegetables provide different nutrient profiles so that choosing fruits and vegetables from different groups is important (i.e. dark green, orange, starchy, beans and pulses, and other vegetables). Preparation methods for vegetables can have a significant impact on the caloric density. For example a serving of potato may be ½ cup but , if mashed with butter and cream and salt significant impact. It is important to be clear about discretionary calories.

Meat and Meat Alternatives

Meat and alternative choices and cooking methods impact on caloric density. It is critical to make clear about the issue of discretionary calories.

Protein sources for vegetarians from the Meat and Alternatives group include eggs (for ovo-vegetarians), beans, nuts, nut butters, peas, and soy products (tofu, lentils, veggie burgers).

The serving equivalents from dried peas, beans and lentils in the vegetable group and in the meat group should be clear.

Fruit and vegetables

There is a need to address the different caloric values of some of options pictured and this might effect energy balance – eg illustration has options of a potato versus a cup of lettuce. This section also doesn't address preparation methods. This is particularly important with vegetables – ½ a cup of potatoes can have a significant impact, if mashed with butter and cream and salt. It is also important to clarify the issue of beans and other pulses that can be used as a vegetable but also can provide an alternative to meat.

Meat and alternative

Beans and other pulses can be used as a vegetable but also can provide an alternative to meat. This is .especially important for lentils which are a major component of some ethnic groups.. Cooking method also impact the value of these foods.

Other Foods

CIAI suggests that there is an absolute need to clearly characterise and address “other foods” as these make up a considerable portion of the diet of many Canadians. These “other foods” are defined by Health Canada to include

- *Foods that are mostly fats and oils:* butter, margarine, cooking oils, salad dressings, shortening, lard;
- *Foods that are mostly sugar:* most jams, jelly, all forms of sugar, such as candy;
- *High-Fat and/or High-Salt Snack Foods:* potato chips, pretzels, corn chips, etc.;
- *Beverages:* water, coffee, tea, soft drinks, fruit-flavoured drinks, alcohol.

The significant calorie intake of “other foods” may be overlooked by users of the present draft format of the guide. CIAI suggests that a literature review be carried out on that lack of coverage, and the implications must be addressed in this edition of the guide. It should be noted that the USA MYPYRAMID provides a recommended caloric limit for these foods

SERVING SIZES

CIAI strongly recommends that the guide use accurate and practical serving sizes. The use of subjective methodology and serving sizes can and will be misinterpreted and lead to “portion distortion.” Examples include “slice” without knowing the size of the slice of cheese or bread, and beverages where “small,” “medium,” and “large” have no correlation to standard volumetric measurements.

It should be noted that the serving sizes recommended in the new nutrition labelling guidelines have contributed to “portion distortion,” for example, by providing a serving of juice as 250 mL (one cup), while that is really two fruit exchanges.

CIAI therefore proposes that consumers should be provided with practical guidance in determining serving sizes, preferably aligned to metric practices, with discretionary measures (such as tablespoon and cup) in parentheses. In its patient education materials, the Canadian Diabetic Association has templates depicting the size of an apple, orange and other food items in a series of food models. USA MYPYRAMID also provides equivalent “portion sizes,” relating ounces and pounds, etc. to representation amounts that people understand, though these of course will require alignment with Canadian measurement values.



ADDITIONAL SUBJECTS

As mentioned earlier, CIAI approves of the structure of the guidance in the USA MYPYRAMID. That resource provides practical information for consumers, especially on serving sizes, choosing foods in the group, and food safety.

Canadian consumers see much food and nutrition information from the United States, and confusion between the two information sources should be avoided. CIAI is particularly concerned about the differential in recommendations relating to the amount of fish due to its importance in the diet of pregnant and lactating women and young children. Therefore CIAI suggests that differences between the new Canadian guide and the USA MYPYRAMID should be carefully reviewed, and a rationale provided to support necessary differences, or that they be eliminated.

Food safety is not mentioned in the current consultation materials, though for consumers this is very important. At a minimum, CIAI proposes that information equivalent that in the USA MYPYRAMID be made available to Canadians in the new set of food guide publications and educational materials.
