

Technical Questionnaire on the Prohibition of Partially Hydrogenated Oils

Questions

Which of the following best describes you?

- Government representative

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

Ottawa Public Health supports Health Canada's proposal to prohibit the use of partially hydrogenated oils (PHOs) in foods sold in Canada. Although Health Canada has made significant progress in reducing trans fats in prepackaged foods and restaurant foods Canadians consume since the early 2000's, trans fat are still present in many processed foods that are commonly consumed by Canadians. Prohibiting the use of PHOs in foods is necessary to help most Canadians reduce their daily trans fat intake to less than 1% of total calories. This will reduce the risk of Canadians developing chronic diseases such as heart disease, reduce their risk of stroke, as well as all-cause-mortality (1). This change will support making healthier food environments for all, aligning with Ottawa Public Health's 2015 – 2018 Strategic Direction – Inspiring Healthy Eating and Active Living.

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

The definition of PHOs provided by Health Canada;

"PHOs defined as those fats and oils that have been hydrogenated, but not to complete or near complete saturation, and with an iodine value greater than 4. The iodine value of a fat or oil is not a direct measure of trans fat content but relates to the extent of unsaturation. In general, oils and fats with an iodine value of 4 or less contain trans fats at levels similar to non-hydrogenated fats and oils" is understood by professionals in the field, however, it could be confusing to the average consumer. In addition to the above technical definition, it would be necessary for an education campaign defining PHOs and trans fats and why they are prohibited. The concept that PHOs provide trans fat in the diet needs to be well described in simple terms in order for most Canadians to understand. Expanding on which foods contain PHOs in our food supply and how they impact the health of every individual is also important to explain to Canadians.

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

A 12 month period following the adoption of the regulation of the prohibition would allow sufficient time for food manufacturers to adapt their recipes and make the appropriate changes necessary to eliminate the PHOs from their foods and replace them with a healthier fat. This time period would also allow them to eliminate the stock of their products. In the event that manufacturers have products with PHOs still in stock after the 12 month transition period, and a new recipe has been created, Ottawa Public Health suggest that manufacturers eliminate the older and less healthy version of the products. This will reduce confusion in the consumer and also decrease the consumption of the food products still presenting PHOs.

Comments:

- Will the prohibition of PHOs apply to foods that are imported into Canada? Ottawa Public Health encourages Health Canada to monitor imported foods to ensure this new regulation is adhered to for ALL foods sold in Canada. We also recommend Health Canada adopt a 12 month period for international food manufacturers to adopt the regulation for the prohibition of the PHOs.
- We strongly suggest that Health Canada promotes the substitution of PHOs with unsaturated fats (mono – and poly-unsaturated fats) entirely or provide a maximum percentage permitted of substitution of PHOs with saturated fats in the food products. This will provide more health benefits to Canadians (1)
- We encourage Health Canada to provide an education campaign to help Canadians understand this complex issue. Since the topic of the matter can be quite scientific an education campaign elaborated by Health Canada in order for the majority of Canadians to better understand the impact of PHOs and trans fats on their health, how the food industry is making changes and how they can make better and healthier food choices would be required.

¹ World Health Organization. (2016). Effects of trans-fatty acid intake on blood lipids and lipoproteins: a systematic review and meta-regression analysis. Available from: http://www.who.int/nutrition/publications/nutrientrequirements/tfa_systematic_review/en/