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Living



Anaphylaxis Canada
Helping people live with deadly allergies



February 2, 2011

The Right Honourable Stephen Harper
Prime Minister
Office of the Prime Minister
80 Wellington Street
Ottawa, Ontario
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By Email

An open letter to the Prime Minister of Canada

Re: Regulatory Project 1220 – Regulations to Enhance the Labelling of Food Allergens,
Gluten Sources and Added Sulphites

Dear Prime Minister,

Two and a half years ago, your government announced plans to ensure more than 2 million Canadians with food allergies and celiac disease would finally have the right to know if the food and beverages they consume were safe. Beyond the vital public health imperative to reduce the potential for life-threatening allergic reactions, your government was instilling the principle that *all* members of the food and beverage industry have a responsibility to declare common allergens.

Many food products currently have ingredient labels that are inaccurate or unclear (e.g. casein means milk). Alcohol beverages have not been required to declare any potential allergens. At the time of the announcement, your then-Health Minister, Tony Clement, said “*these new proposed labelling requirements will provide Canadians with the information they need to manage their own allergies*”.

After more than a decade of advocating for these changes, your government was the first to act on the concerns of Canadians with food allergies and celiac disease. Our organizations applauded your government’s commitment to public safety then and we are ready to recognize this historic achievement once the proposed regulations are finalized.

Our organizations remain, as we always have, willing to listen. What we are not prepared to do, Prime Minister, is let this once in a generation opportunity be put at risk because of the last minute interventions of a powerful, private, industry lobby.

The proposed regulations are the result of diligent efforts by consumer advocacy groups, medical professionals, industry representatives, policy experts within government and thousands of Canadians who offered their perspectives on various proposals. **Significant taxpayer dollars have been spent on this process. Many manufacturers have already spent millions of dollars updating their product labels based on the**

guidance documents distributed by Health Canada in preparation for the regulatory changes. The hopes of millions of Canadians whose lives and whose children's lives depend on clear and accurate labeling have been raised.

Any major changes to the proposed regulations at this stage – after your Minister of Health committed in writing to us that final approval was imminent – would call into question the very legitimacy of the entire eighteen month public and stakeholder consultation process.

Now, a single industry – the brewery industry – is seeking special treatment; treatment afforded to no other food or beverage manufacturer. This is not only unfair, it is unnecessary and it is wrong. Public safety must take precedence over private interest. Consumers with food allergies and celiac disease have a right to know whether a food or beverage contains a substance which could make them ill, or worse, kill them.

The specific argument for an exemption from the regulations for the brewery industry advanced in public reports last week – and in communications with your office – that Canadians do not need to know what is in their beer because everyone already knows, is illogical. How would Canadians know what is in their beer if the industry has never told us? It is not the responsibility of the allergic consumer to guess if there is something in their food or beverage product that may harm them; it is the responsibility of the manufacturer to disclose it! This information is important today, and given brewery industry trends to include various nuts, milk and other allergens in their products, the need will be even greater in the future.

The proposed regulations have widespread public support: a new Angus Reid Public Opinion poll reveals close to 70% of Canadians are in favour of them.

All other food and beverage manufacturers have accepted these much needed changes and many are already working on implementation. Similar labelling regulations have already been adopted in many other countries.

Prime Minister, we respect the demands on, and limitations of, government. We have always endeavored to be pragmatic in our approach and consensus-orientated in our advocacy. We remain committed to these ideals as we reach out to both you and the brewery industry.

But Prime Minister, beer companies do not make public policy – you and your government do.

We are prepared to meet with you immediately to review the facts and evidence around the issue of food labelling and disclosure of allergens so that these regulations can move quickly towards final approval.

Canadians with food allergies and celiac disease are counting on you to be on their side, just as when you promised these regulations in July, 2008.

Respectfully yours,

Dr. Stuart Carr, President
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Canadian Allergy, Asthma and Immunology
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Anaphylaxis Canada can provide contact information for the organizations above – 1-866-785-5660.

Enclosure

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