

# Anaphylaxis Canada

*Helping people live with deadly allergies*

October 15, 2010

The Honourable Leona Aglukkaq, P.C., M.P.  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
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Dear Minister,

I am writing to you on behalf of Anaphylaxis Canada, the national advocacy organization for people with serious allergies. Our members are very concerned about the stalled progress on important changes to Canada's food labelling regulations, changes which are eagerly anticipated by millions of Canadian families and could literally save lives.

As you are no doubt aware, food allergy is the leading cause of anaphylaxis and a growing public health issue. Recent Canadian research estimates that food allergies affect more than two million people and one in two Canadians know someone with a food allergy. An anaphylactic reaction can range from mild – such as a rash or hives – to the most serious – including difficulty breathing and sudden drop in blood pressure. If not treated quickly anaphylaxis can be fatal.

With no known cure for anaphylaxis avoidance of allergens is the only means of staying safe and preventing a reaction. Accurate and understandable food labelling is therefore the first line of defence for food allergic individuals. People with food allergies and those who shop for them must be able to make informed decisions based on food labels that are accurate, clear, and complete. The current food labelling policy is not stringent enough to ensure such accurate and clear descriptions of food ingredients on pre-packaged foods.

This is why we were very pleased to participate in the federal government's announcement on food labelling by your predecessor, The Honourable Tony Clement, in July 2008. After a decade of discussion with Health Canada officials, Members of Parliament and Government Ministers, it finally appeared progress was being made when your government introduced new labelling requirements.

As the Minister of Health said the day the proposed changes were announced: "The Government of Canada is taking action to protect the health and wellbeing of Canadians with food allergies and celiac disease...these new proposed labelling requirements will provide Canadians with the information they need to manage their own allergies, and give parents greater assurance about the food they give their children who may have allergies."

Over the following months, Anaphylaxis Canada participated in consultation meetings with Health Canada to define the regulatory changes. We also facilitated opportunities for members of our community to provide feedback on what is officially called the Proposed Amendments to Enhance the Labelling of Allergens, Gluten Sources and Added Sulphites. Anaphylaxis Canada was comfortable with the results of this consultation process and looked forward to the amendments being enacted.

It is our understanding that a final draft of the proposed amendments has for some time been waiting for government approval and publication in Canada Gazette Part II, and that there have already been three extensions to the timeline for final approval. It is our further understanding that this approval must be given by the end of this year, or the entire lengthy and costly process for changing Canada's food labeling regulations will begin again.

**After more than a decade of discussion and more than two years since your government's announcement, it is now time to act.**

Members of the community have been expressing their impatience to us – particularly considering there will be a lengthy phase-in period (up to 2 years) for food manufacturers to adhere to the changes once they are approved. Any further delays would be unpalatable.

We urge you to consider the continued health and food safety costs that will be incurred if the current food labelling shortfalls are not addressed, including:

- Increased number of emergency department visits following accidental food exposure
- Limited access to safe, nutritious foods for a growing population afflicted by food allergy and celiac disease
- Costly food allergen recalls because it is impossible to hold food manufacturers, importers and distributors to standards that have not been clarified and are not mandatory.

As time is running out on positive changes to food labelling regulations, we urgently seek your personal assurances that the last version of the proposed amendments will be approved as planned by the end of this year. Millions of Canadian families are counting on your leadership – because these changes could save lives.

I will follow-up with your office shortly by telephone. In the interim, I would be pleased to answer any questions you may have or provide you with further information. I look forward to receiving a response from you soon. Thank you.

Sincerely,



Laurie Harada  
Executive Director  
Anaphylaxis Canada

Cc:  
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