



## Consumer Interest Alliance Inc.

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March 11, 2010

The Consumer Interest Alliance Inc. is an emerging working coalition of members concerned with consumer interest through cooperation, discussion and representation with other players in the Canadian economy. Our goal is the representation of the consumer interests by the development of research based positions. We plan to add this issue to our website at [www.ciai.ca](http://www.ciai.ca).

**The Consumers Interest Alliance Inc. (CIAI) is pleased to participate in this Health Canada Technical Consultation on Health Canada's Proposal to Amend the Food and Drug Regulations to Permit the Use of the Enzyme Asparaginase in Certain Food Products.**

Since we have not been part of the process before this point, our comments will be wider than those of the usual Technical Consultation. For the most part, we have confined our comments to material found on the Health Canada website and have added our comments on implementation concerns that we have with the addition of the additive asparaginase to the Food and Drug Regulations.

### BACKGROUND

CIAI first became aware of acrylamide in foods about 4 years ago and at the time we found concern about the effect on human health but little evidence of actual harm. We find that very little has changed in the intervening years.

To the question: Does acrylamide pose a health risk to humans? The Health Canada website says

“Dietary exposure to acrylamide has been identified as a potential concern by the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

However, both Health Canada and JECFA agree that it is currently not possible to determine the precise level of risk for human health. Since acrylamide is known to cause cancer in experimental animals, further research on the effects of exposure to acrylamide is needed before the risks to human health associated with acrylamide exposure from food sources can be fully understood”

We understand that acrylamide is used in many industrial processes. Again the Health Canada website says:

“Commercially, acrylamide is used in the manufacture of some plastics as well as various other materials. While acrylamide is used in making some food packaging, this use has not been found to add acrylamide to foods at levels that could pose a health concern”

Health Canada acknowledges that it is impossible to determine recommended maximum exposure levels or to set daily consumption limits for specific foods containing acrylamide.

From this we conclude that the problem with acrylamide from foods as well as from other sources may be related to serving size/dosage and frequency of eating/exposure rather than the chemical itself. This is the case with many other substances.

French fries and potato chips are the main source of acrylamide in the diet. French fries and potato chips are also prevalent in the North American diet and high in fats, salt, carbohydrates and calories which are a factor in obesity and health problems like heart disease, diabetes and high blood pressure. In fact, we submit that the high fat, salt, and calories have more known risks and evidence of harm to humans than acrylamide.

#### CURRENT SITUATION

CIAI notes that acrylamide was included in Batch 5 of the Challenge under the Government of Canada Chemicals Management Plan and that research into the effect of acrylamide on human health is ongoing.

Your website informs us that the JECFA has subsequently called for strategies to reduce exposure to acrylamide and Health Canada scientists participated in this evaluation and concur with its recommendations. We appreciate the work done by Health Canada in determining that there are no health or safety concerns with the use of asparaginase in certain food products. Nevertheless we wonder whether there is the possibility of allergic reactions for some individuals.

While we can appreciate and accept the cautionary principle in the JECFA and Health Canada approach to acrylamide, CIAI has concerns about the way the addition of asparaginase may be implemented in the food industry.

#### IMPLEMENTATION ISSUES

##### MARKETING CONCERNS

CIAI notes that Health Canada was petitioned to amend the Food and Drug Regulations to include asparaginase produced by the two microbial sources, *Aspergillus oryzae* and *Aspergillus niger*. We do not know the source of these petitions but our marketing concerns stem partly from these petitions.

## 1. LABELLING CONCERNS

CIAI is concerned that French fries, potato chips and possible other foods like breakfast cereals may now appear with marketing words designed to make them sound healthier. Phrases like “ Now Safer., Low in .... Reduced levels of ..... add confusion with no scientific comparison and they provide no consumer benefit

We believe that consumers know little or nothing about acrylamide and asparaginase. References to them either directly or indirectly as a result of this change to the Food and Drug Regulations would be confusing to consumers and should not be allowed.

## 2. THE ADDITION OF ASPARAGINASE MAY OBSCURE THE ISSUE THAT FRENCH FRIES AND CHIPS ARE POOR FOOD CHOICES.

The addition of asparaginase will reduce acrylamide in French fries and chips but it does nothing to reduce the fat, salt and calories which are known to be a serious health threat to Canadians..

CIAI believes that Health Canada should not allow the acrylamide issue and the addition of the additive asparaginase to obscure the real problems caused by diets high in salt, fat, and various starches leading to obesity and the associated risks such as heart disease, diabetes and high blood pressure

We also realize that changing the diet and eating patterns of Canadians to more healthy choices is not solely a matter of improving the truthfulness of labels.

We urge Health Canada to maintain an active role in educating Canadian consumers about healthy eating and food safety as part of the larger initiative to improve health. Success with consumer friendly communication improves the health of Canadians. It also increases the market share of superior products compared to high salt/fat products that are especially harmful.