



March 22, 2019

Ms. Karen McIntyre,  
Director General, Food Directorate  
Health Products & Food Branch, Health Canada  
251 Sir Frederick Banting Driveway, Postal Locator 2203E  
Tunney's Pasture, Ottawa, Ontario K1A 0K9

Dear Ms. McIntyre:

We the undersigned write to urge Health Canada and the CFIA to move quickly to add "potassium salt" to the Permitted Synonyms for Food Additives Table.

Our organizations are supportive of measures to improve nutrition including the measures that are part of the federal Healthy Eating Strategy. We support the approach outlined in the recently released update to Canada's Food Guide which focuses on increasing the regular consumption of vegetables, fruit, whole grains and protein foods. The Healthy Eating Strategy also acknowledges the importance of sodium reduction. Sodium reduction is a tactic in the larger strategy to reduce hypertension, cardiovascular disease and in turn improve overall health.

Sodium is present throughout the Canadian food supply, but by far the main contributors to sodium intake are processed and commercially prepared foods. Canadian households have significantly increased the proportion of their food budget spent on highly processed products – particularly those that are convenient (ready-to-eat or heat). Due to these dietary consumption patterns, these foods now contribute 77% of the daily dietary sodium for Canadians. Although we promote the consumption of whole real foods, we also recognize the importance of improving the nutritional quality of foods Canadians often eat today. Simply stated, we must work collaboratively to improve the nutritional profiles of *what* Canadians currently eat while we work diligently to change the patterns of *how* Canadians should eat.

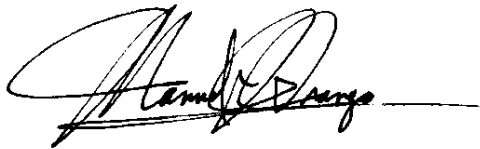
Potassium salt (potassium chloride) has been globally proven to be the most effective alternative salt replacement. Furthermore, the *replacement* of salt (sodium chloride) with potassium salt (potassium chloride) both reduces sodium levels while increasing potassium levels within these foods (which is beneficial to health).

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Unfortunately, we are faced with a significant impediment to more broad-based usage of the term potassium salt; namely that Health Canada's current ingredient labelling policies require that potassium salt be labelled as "potassium chloride" on food labels. This requirement is inconsistent with growing consumer demands for "clean label" food ingredients and it could inhibit consumer acceptance of this salt substitute. We understand that a substantial segment of the food industry has recently issued a formal request to Health Canada and the CFIA for the immediate addition of "potassium salt" as a synonym for potassium chloride within the Permitted Synonyms for Food Additives Table. This addition would be consistent, also, with efforts by health organizations to provide consumer nutrition education.

We strongly urge Health Canada and the CFIA to move quickly to make the requested and beneficial addition of "potassium salt" to the Permitted Synonyms for Food Additives Table in order to facilitate sodium reduction in Canada.

Sincerely,



Manuel Arango,  
Director, Policy, Advocacy & Engagement  
Heart & Stroke



Angelique Berg,  
Chief Executive Officer  
Hypertension Canada



Seema Nagpal,  
Vice President, Science and Policy  
Diabetes Canada



Nathalie Savoie,  
Chief Executive Officer  
Dietitians of Canada



Dr. Norman Campbell,  
Executive Member, World Hypertension League; Professor of Medicine, Physiology,  
Pharmacology and Community Health Sciences, The University of Calgary

CC: Health Canada officials: Konstantinia Arvaniti, Alfred Aziz, Charmaine Kuran,  
Lyzette Lamondin, Pierre Sabourin, Kathy Twardek, William Yan