



June 11, 2008

The Right Honourable Stephen Harper  
Prime Minister  
Office of the Prime Minister  
80 Wellington Street  
Ottawa, Ontario  
K1A 0A2  
**By courier**

Dear Prime Minister Harper,

We are writing to you regarding **The Proposed Regulatory Amendments to Enhance the Labelling of Priority Allergens in Foods.**

On April 11, 2007, leaders of five allergy associations – the Canadian Society of Allergy and Clinical Immunology, Anaphylaxis Canada, Allergy/Asthma Information Association and Association québécoise des allergies alimentaires – and the Canadian Celiac Association met with Health Minister Tony Clement’s senior staff to share our concerns with the ongoing delays to the proposed regulatory amendments.

Our presentation, *Safeguarding Food-Allergic & Food Intolerant Consumers* (attached), clearly outlined the potential risks for food allergic consumers and people with celiac disease when gaps in food ingredient labels exist. We had hoped to see the proposed regulatory amendments published by the end of 2007 as promised by Minister Clement’s staff. In fact, Health Canada had already advised stakeholders that it “intends to recommend that the proposed regulatory amendments be published in the Canada Gazette, Part I, by mid-2004”.

In a phone discussion at the end of May 2008 between Laurie Harada, Executive Director of Anaphylaxis Canada, and Mr. Laurie Throness of Minister Clement’s staff, Ms. Harada was told that due to “internal issues”, the passing of the proposed amendments has been further delayed but was advised that these food labelling issues were “top of mind”. As of time of writing, we still have not been given a timeline.

We urge you to consider the potential long-term health and food safety costs that could be caused by the current labelling shortfalls:

- 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: It is impossible to hold food manufacturers, importers and distributors to standards that have not been clarified and are not mandatory.

While we support your recently announced *Food and Consumer Product Safety Action Plan* and initiative to address issues with “made in Canada” products, we urge you to intervene before the end of this session of parliament to stop the internal log jam that is again delaying the gazetting of the Allergen Labelling Amendments.

We would like to be able to tell our members that our government takes their safety and well-being seriously. However, as you can appreciate, our community has lost faith in the false promises which have been made over the years. An estimated 1.2 million food allergic consumers and 300,000 consumers with celiac disease are counting on you to pass this legislation now.

We invite you to contact us for further information and consultation and hope to hear from you soon. (Anaphylaxis Canada would be pleased to provide contact information for the organizations listed below – 1-866-785-5660.)

Respectfully yours,

Dr. Charles Frankish, President  
Canadian Society of Allergy and Clinical  
Immunology

Dr. Eric Leith, President  
Canadian Allergy, Asthma and Immunology  
Foundation

Laurie Harada, Executive Director  
Anaphylaxis Canada

Mary Allen, CEO  
Allergy/Asthma Information Association

Paul-Guy Duhamel, Executive Director  
Association québécoise des allergies alimentaires

Jim McCarthy, Executive Director  
Canadian Celiac Association

**Enclosure:**

*Safeguarding Food-Allergic & Food Intolerant Consumers*

**Copies:**

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