

*Food and Drugs Act*

particular case of this member of my family would not have been prevented by proper labelling, because when one is dining at a friend's house one does not, after all, necessarily receive a list of the ingredients of everything that is placed before him. It is, however, an example of the problem itself.

I should like to continue by mentioning another letter from a doctor. This also deals with the problem and I think will give a general indication of the need for adequate labelling regulations. Again, this man is a specialist in allergies. He states:

As allergists we are concerned with two major problems. The first is acute anaphylactic reactions which may occur following an unexpected exposure to something like nuts or nut oils. The other problem is likely considerably more common and it is a chronic reaction usually due to some major food such as wheat, milk, egg or corn. These chronic symptoms will likely take the form of bronchial asthma or allergic rhinitis and although they are not as dramatic as the acute reaction mentioned above they produce far more disability.

• (5:30 p.m.)

The only way in which a person who is food sensitive can be protected from reactions to that food is by complete avoidance and this, of course, involves adequate labelling of commercial products. Although I have felt in the past that adequate labelling should consist of the major ingredients, I feel if it is at all possible that complete labelling should be undertaken.

I quoted from these two doctors' letters to outline to the house the seriousness of the problem.

I should like to spend a short time now on this question of complete labelling. It will probably be impossible to get complete labelling, and I think we all understand that. A dash of pepper may be included in a can of soup, for instance, and may or may not be listed in the list of ingredients for that particular product. Complete listing presents serious problems for manufacturers. We cannot get around these problems by attempting to force them to list everything in their product because that would simply be impossible.

The first problem involved is the space required on the label to list all the ingredients. There may simply not be enough space. Also important is the fact that the manufacturer may change the constituents of a food, depending on the prices of different components. For example, depending on the market values, the manufacturer may choose to use peanut rather than corn oil in his product. The label mentioning the ingredients would probably continue to list vegetable fat or

vegetable oil. This would occur in spite of the fact that the manufacturer had changed the actual oil being used in his product. Such a change could lead an innocent purchaser to suffer a severe allergic reaction.

A possible solution to the difficulty of complete listing of ingredients is the suggestion that a relatively limited number of products, which account for a high proportion of allergic reactions, should be required to be identified on the label. These main allergens are milk, chocolate, corn, eggs, peas, tomatoes, wheat, nuts, certain flavourings, fruits and vegetables. If we insisted that manufacturers list these particular products which cause the difficulty and ignored others which do not, we would be taking a step in the right direction.

There is another problem involved, and that is the name of the actual ingredient itself. For instance, if casein salts were listed on the label I would not know what they were, nor would many other people, yet they might be a source of trouble for someone who was allergic to milk. It would not be evident to that person that this particular substance was a milk derivative. Monosodium glutamate, which is commonly used in many cooking preparations, particularly in Chinese food, is a wheat derivative, yet if you listed monosodium glutamate on the label the ordinary consumer would not know this. So, it is quite clear there is a special difficulty in identifying various products and using or choosing the correct name for the label. Perhaps I have spent enough time on that particular point, but it is something we cannot correct simply by legislation; it is something that must be considered.

Perhaps the best way of correcting this situation would be by officials of the Department of Consumer and Corporate Affairs and the Department of National Health and Welfare getting together with the industry to work out lists of ingredients which should appear on the label. The department should decide on the correct names for those particular ingredients in order to warn the public of the actual composition of a product.

I think this could best be done, not through the provisions of this bill, but by other legislation presently in existence. While this bill does focus attention on this problem, and is very useful for this purpose, it is unnecessary in light of section 24(1) of the Food and Drugs Act. This section provides that the Governor in Council may make regulations to carry the purposes and provisions of the act into effect.