

**Report to  
Rapport au:**

**Ottawa Board of Health  
Conseil de santé d'Ottawa  
16 September 2019 / le 16 septembre 2019**

**Submitted on September 5, 2019  
Soumis le 5 septembre 2019**

**Submitted by  
Soumis par:**

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**Ward: CITY WIDE / À L'ÉCHELLE DE LA VILLE      File Number: ACS2019-OPH-HPP-0010**

**SUBJECT: OTTAWA PUBLIC HEALTH SUBMISSION TO THE CANADIAN FOOD  
INSPECTION AGENCY ON PROPOSED FOOD LABELLING  
MODERNIZATION REGULATORY AMENDMENTS**

**OBJET: SOUMISSION DE SANTÉ PUBLIQUE OTTAWA PRÉSENTÉE À  
L'AGENCE CANADIENNE D'INSPECTION DES ALIMENTS AU SUJET  
DES MODIFICATIONS RÉGLEMENTAIRES PROPOSÉES POUR LA  
MODERNISATION DE L'ÉTIQUETAGE DES ALIMENTS**

**REPORT RECOMMENDATION**

**That the Board of Health for the City of Ottawa Health Unit receive the Medical  
Officer of Health's submission to the Canadian Food Inspection Agency on**

**proposed Food Labelling Modernization regulatory amendments, as outlined in Document 1, and approve the recommendations contained therein.**

## **RECOMMANDATION DU RAPPORT**

**Que le Conseil de santé de la circonscription sanitaire de la ville d'Ottawa prenne connaissance de la soumission de la médecin chef en santé publique présentée à l'Agence canadienne d'inspection des aliments au sujet des modifications réglementaires proposées pour la modernisation de l'étiquetage des aliments, énoncée dans le document 1, et approuve les recommandations qui y figurent.**

## **BACKGROUND**

Ottawa Public Health (OPH) supports healthy eating through the development of healthy public policies, designing our city to increase access to food, and enhancing food literacy through public education and programs.

OPH has contributed to previous federal healthy eating consultations, including: [Healthy Eating, Active Living: Protecting Vulnerable Populations Through Restrictions in Marketing of Foods and Beverages](#) (Apr 2016); [Canada's Food Guide](#) (Dec 2016); [Health Canada's front-of-package nutrition labelling](#) (Jan 2017); and [Health Canada's banning partially hydrogenated oils in foods](#) (Jan 2017).

The Canadian Food Inspection Agency (CFIA) is proposing Food Labelling Modernization (FLM) to better meet consumers' needs and improve food industry innovation. CFIA has suggested changes to the labelling requirements in the *Food and Drug Regulations (FDR)* and the *Safe Food for Canadians Regulations (SFCR)*. These changes were published in the [Canada Gazette, Part I](#). The CFIA launched a 75-day [public consultation](#) (ending September 4, 2019) to obtain feedback. The FLM aims to modify current food labelling standards to help modernize and innovate the current system. This consultation was focused on technical requirements on food labels compared to nutritional requirements listed. This will help increase flexibility for the food industry while helping consumers make informed decisions in their food purchases.

As part of its submission, OPH drafted comments on the following topics: 1) *Date marking and storage instructions*; 2) *Food company information*; and 3) *Legibility and location of information*. Overall, the proposed new regulations strengthen food labelling requirements to help consumers make informed decisions in their food purchases. OPH has not drafted comments on the topics that are not relevant to public health.

Stakeholders were asked to review and provide comments on several documents: 1) [Regulations amending the Food and Drug Regulations](#); 2) [Regulations amending the Safe Food for Canadians Regulations](#); 3) [Prepackaged Products which do not Require a Best Before Date](#) (reference document); 4) [Common Names for Ingredients and Components](#) (reference document); 5) [Standard Container Sizes](#) (reference document); and 6) [Descriptive Terms and Identification Names for Specific Foods](#) (reference document).

## **DISCUSSION**

Food labels provide quick and easy guidance to encourage consumers to make informed choices about the foods they purchase and consume. They allow consumers to compare products, to identify ingredients in foods, and to select items based on their nutrient content (Government of Canada, 2019).

See Document 1 for OPH's full submission to the CFIA in response to the [Canada Gazette, Part 1, Volume 153, No. 25: Regulations Amending the Food and Drug Regulations](#). In summary, OPH's recommended amendments are as follows:

### **1) Date marking and storage instructions**

OPH supports the proposed amendments to: standardize best before dates to be consistent with expiry dates; and that storage instructions be included with the best before date. Consumers continue to be confused by the definitions of best before dates, expiry dates, and storage instructions. OPH suggests that the CFIA initiate a public education campaign to inform consumers about best before dates and expiry dates to help improve food literacy and to reduce food waste ([Ontario Food and Nutrition Strategy Group, 2017](#)).

### **2) Food company information**

OPH submits that food companies providing only postal code is not enough to reach the CFIA's goal to improve buyer communication with the food company. OPH supports standardizing the availability of food companies' contact information on food labels. This change is intended to help consumers easily contact food companies. Currently, the information that is required on a label must be either a telephone number, an email, a postal code, or a website. Providing only a postal code should not be an option.

### **3) Legibility and location of information:**

OPH recommends that the CFIA be mindful of the [accessibility standards](#) of the labels in regard to the proposed changes to font size and heights on labels leading to the largest size to be 2.4 mm (approximately font size 6). OPH is concerned that legibility of the labels may not be accessible to populations with compromised vision and the general population, which works against the purpose of these labels.

Due to the timelines associated with the public consultation process, these recommendations were circulated to Members of the Board of Health for their review and feedback on August 8, 2019 and were then submitted to CFIA in advance of the September 4, 2019 deadline. Some Board Members provided feedback with respect to labeling of origin of imported foods. Given that consumer concerns about the labelling of origin of imported foods were addressed in the government's proposed changes to the requirements, OPH did not add recommendations on this subject as part of its submission.

### **RURAL IMPLICATIONS**

There are no rural implications associated with this report.

### **CONSULTATION**

External consultation was not required to inform the development of the Medical Officer of Health's submission to the CFIA on proposed Food Labelling Modernization regulatory amendments.

### **LEGAL IMPLICATIONS**

There are no legal impediments to the Board of Health approving this report's recommendation.

### **RISK MANAGEMENT IMPLICATIONS**

There are no risk management implications associated with this report.

### **FINANCIAL IMPLICATIONS**

There are no financial implications associated with this report.

### **ACCESSIBILITY IMPACTS**

There are no accessibility impacts associated with this report.

**SUPPORTING DOCUMENTATION**

Document 1 - Medical Officer of Health's submission to the Canadian Food Inspection Agency on proposed Food Labelling Modernization regulatory amendments.

**DISPOSITION**

This report is presented to the Board for approval of the recommendations outlined in the supporting document. OPH will continue to monitor any proposed legislation, regulations and emerging evidence related to food labelling modernization and healthy eating public policy and will report to the Board of Health as needed.