

August 30, 2019

Director, Consumer Protection and Market Fairness Division
Food Safety and Consumer Protection Directorate
Canadian Food Inspection Agency
1400 Merivale Road, Tower 2, Floor 6
Ottawa, ON K1A 0Y9
cfia.labellingmodernization-modernisationetiquetage.acia@canada.ca

To Whom It May Concern,

RE: FLM CG1 Comments

On behalf of Ottawa Public Health (OPH), please find below our comments in response to the **Canada Gazette 1 Vol.153, No. 25: Regulations Amending the Food and Drug Regulations** and relevant documents.

OPH supports the Canadian Food Inspection Agency's (CFIA) commitment to its consultations amending the *Food and Drug Regulations* and the *Safe Food for Canadians Regulations* stemming from the Food Labelling Modernization initiative. We agree that the proposed regulatory amendments would improve food labelling requirements with respect to date marking and storage instructions, food company contact information, foreign state of origin of imported foods, legibility and location, emphasized ingredients, test market foods, standard container sizes, and class names.

As Medical Officer of Health for the City of Ottawa Health Unit, I am pleased to provide the following comments for the recommended amendments:

Recommendation #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 with 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 their food literacy, and to reduce food waste ([Ontario Food and Nutrition Strategy Group, 2017](#)).

Recommendation #2: Food company information:

OPH believes that food companies providing a postal code on its own is not enough to reach 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.

Recommendation #3: Legibility and location of information:

OPH recommends that 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.

Thank you again for this opportunity to provide input into this consultation. Should you have any questions or wish to discuss the recommendations, please contact me at Vera.Etches@ottawa.ca or by telephone at 613-580-6744 ext. 23675.

Sincerely,

Dr. Vera Etches, MD, MHScm CCFP, FRCPC
Medical Officer of Health
Ottawa Public Health