

## Comments on the Consultation on Proposed Front-of-Package (FoP) Labelling

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**Survey Reference # 268ece**

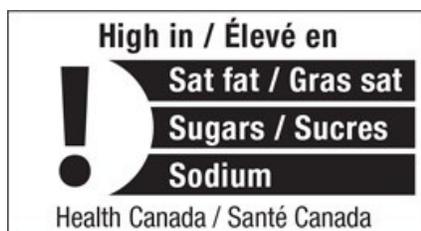
The Middlesex-London Health Unit, as an endorsement agency of the Marketing to Kids Coalition, agrees with Health Canada's mandatory approach to the regulation of FoP Nutrition Labelling to help support consumers' ability to make the healthiest choice possible when shopping for packaged foods in Canadian stores. The following summary of recommendations are provided for consideration:

### Exclamation Mark

An exclamation mark “!” is a universal symbol of caution. As such, it provides a clear meaning and would be more easily recognized and understood by many Canadians in comparison to a magnifying glass.

### Inclusion of Red in the Symbol

The use of colour in the label is visually appealing. In combination with the graphic of the exclamation mark “!”, the colour red will facilitate an understanding of caution among consumers and will stand out on the food package. It is preferred to add colour behind the exclamation mark.



### Design of Symbol

We recommend the exclamation mark “!” be inserted inside a white inverted triangle with a red border to be consistent with the universal symbol for “caution”. If this is not possible, we recommend an exclamation mark “!” in a white circle with a red border. Again, the red outline/border will draw the eye to the graphic of the exclamation mark which conveys a warning or caution about the particular food.

### Readability

There are concerns regarding the use of white text on black background as it may impact readability. Clear writing principles recommend avoiding light text on a dark background.

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### **Consumer Research and Education**

Once a FoP label is selected, it is imperative that consultation and targeted pilot testing occurs with people from more vulnerable populations including but not limited to: people with low health literacy; Indigenous persons; people living in households with low-incomes; people with lower educational attainment; and people of various ages, cultures, and sex. Testing among this diverse group will ensure readability of the graphics, confirm cultural sensitivity, and ensure literacy levels (written and health) are addressed appropriately.

Thank you for the opportunity to comment on the proposed FoP labelling. We look forward to learning about the next steps and considerations from Health Canada.

**If you wish to discuss any of the recommended revisions provided, please do not hesitate to contact the Middlesex-London Health Unit by calling Linda Stobo, Program Manager for Chronic Disease Prevention and Tobacco Control, at (519) 663-5317 ext. 2388 or [linda.stobo@mlhu.on.ca](mailto:linda.stobo@mlhu.on.ca).**