

alPHA's members are
the public health units
in Ontario.

alPHA Sections:

Boards of Health
Section

Council of Ontario
Medical Officers of
Health (COMOH)

**Affiliate
Organizations:**

Association of Ontario
Public Health Business
Administrators

Association of
Public Health
Epidemiologists
in Ontario

Association of
Supervisors of Public
Health Inspectors of
Ontario

Health Promotion
Ontario

Ontario Association of
Public Health Dentistry

Ontario Association of
Public Health Nursing
Leaders

Ontario Society of
Nutrition Professionals
in Public Health

March 9 2016

Hon. Jane Philpott
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Philpott,

Re: Senate Report – Obesity in Canada

On behalf of member Medical Officers of Health, Boards of Health and Affiliate organizations of the Association of Local Public Health Agencies (alPHA), I am writing today in support of recommendations contained in the 2016 Canadian Senate Report, *Obesity in Canada: Whole-of-Society Approach for a Healthier Canada*.

We agree with the report's conclusion that as obesity rates and the associated health risks continue to rise in Canada, a more comprehensive and collaborative approach to address this very complex problem is required. We believe that the Report makes a series of sound recommendations, which, taken together, could form a strong foundation for such an approach.

We would like to focus on three of these recommendations in particular, not because we believe that they are more important than the others, but because alPHA has specific positions on them and further that immediate action can and should be taken. We note that the first two are directly related to obligations that were set out by the Prime Minister in your ministerial mandate letter.

Recommendation 2 calls on the federal government to “immediately conduct a thorough assessment of the prohibition on advertising food to children in Quebec; and design and implement a prohibition on the advertising of foods and beverages to children based on that assessment.

In 2008, alPHA passed Resolution A08-13, which calls for a ban on commercial advertising of food and beverages to children under the age of 13. The following year, alPHA passed a similar Resolution (A09-1) which extends this call to banning commercial marketing of any kind to children. Both of these are attached.

This past year, alPHA also endorsed The Ottawa Principles, which were developed with our input by the Stop Marketing to Kids Coalition. These outline the policy recommendation of restricting commercial marketing of all food and beverages to children and youth 16 and under, and include a set of definitions, scope, and principles to guide policy development. We urge you to examine these carefully alongside Quebec's existing regulatory regime

Recommendation 8 calls for a prohibition on the use of partially hydrogenated oils, to minimize trans fat content in food, unless specifically permitted by regulation. alPHA has been calling for such a prohibition for nearly a decade, and our most recent Resolution on the subject (A09-4, attached) provides the rationale.

Recommendation 13 calls on the Minister of Health to encourage nutrition labelling on menus and menu boards in food service establishments.

alPHA strongly supports point-of-sale disclosure of nutritional information on menus and menu boards. We believe that it is extremely important for consumers to be armed with the information that they need when making nutritional decisions that are in the best interests of their health. We also believe that food retailers should bear a certain degree of responsibility for providing that information as it relates to what is being offered for sale.

We are therefore pleased that Ontario's Healthy Menu Choices Act will require all large chain restaurants and other food retailers conspicuously post the calorie counts for prepared foods on menus and menu boards. We acknowledge that this is far from the only consideration required for making healthy nutritional choices, but it is an important one where the aim is to address obesity as a risk factor for chronic disease. We hope that you will follow the Senate Report's recommendation and support jurisdictions throughout Canada that are implementing or considering the implementation of similar rules.

As observed in the Senate Report, addressing obesity in Canada is going to require a multi-sectoral and multi-faceted approach. The implementation of the recommendations contained therein will be a good starting point to foster an environment that makes it easier for Canadians to achieve and maintain healthy weights, thereby minimizing the associated risks to health.

Sincerely,



Dr. Valerie Jaeger,
President

Copy: Rt. Hon Justin Trudeau, Prime Minister of Canada
Hon. Eric Hoskins, Minister of Health and Long-Term Care (Ontario)
Dr. David Williams, Chief Medical Officer of Health (Ontario)
Hon. Kelvin Kenneth Ogilvie, Chair, Standing Senate Committee on Social Affairs, Science and Technology

About alPHA: The Association of Local Public Health Agencies (alPHA) is a non-profit organization that provides leadership to Ontario's boards of health and public health units. The Association works with governments and other health organizations, to advocate for a strong and effective local public health system in the province, as well as public health policies, programs and services that benefit all Ontarians.

ALPHA RESOLUTION A08-13

TITLE: Ban on Commercial Advertising of Food and Beverages to Children Under 13 Years of Age

SPONSOR: Toronto Board of Health

WHEREAS children today are exposed to a greater intensity and frequency of marketing than any previous generation; and

WHEREAS there is strong evidence that younger children lack the cognitive abilities to understand marketing messages; and

WHEREAS there is strong evidence that food advertising has a direct influence on what children choose to eat and indirectly exerts pressure on parents to choose those things; and

WHEREAS the dominant focus of commercial advertising to children is for products that undermine parents' and public health professionals' efforts to promote healthy diets and physical activity; and

WHEREAS recent industry initiatives promising to change advertising to children have proven to be ineffective; and

WHEREAS the Quebec ban on commercial advertising to children provides a wealth of experience in implementing a national framework; and

WHEREAS the Supreme Court of Canada ruled in 1989 that the Quebec ad ban is a reasonable limit on the right to free speech and that "...advertising directed at young children is per se manipulative"; and

WHEREAS almost 90% of television watched by Canadian children is on Canadian-based stations which would be subject to Canadian laws; and

WHEREAS the Toronto Board of Health, the Centre for Science in the Public Interest and the Elementary Teachers' Federation of Ontario have called for a ban on all commercial advertising targeted to children;

NOW THEREFORE BE IT RESOLVED THAT the Association of Local Public Health Agencies call for a ban on all commercial advertising of food and beverages targeted to children under 13 years of age by the Government of Ontario and the Government of Canada;

AND FURTHER THAT the Association of Local Public Health Agencies partner with the Ontario Public Health Association, Toronto Public Health and other interested stakeholders to develop and implement an effective province-wide advocacy plan.

ACTION FROM CONFERENCE:

Moved: R. Pellizzari (Peterborough)

Seconded: V. Sterling (Toronto)

Resolution CARRIED AS AMENDED

alPHa RESOLUTION A09-1

TITLE: Ban on Advertising to Children Under 13 Years of Age

SPONSOR: alPHa Board of Directors

WHEREAS the Association of Local Public Health Agencies has resolved to call upon the Governments of Ontario and Canada to ban all commercial advertising of food and beverages targeted to children under 13 years of age; and

WHEREAS this position was adopted based on evidence presented about the harms of marketing to children in general

THEREFORE BE IT RESOLVED THAT the Association of Local Public Health Agencies also support the broader goal of the Ontario Public Health Association and other organizations that are advocating for a ban on all commercial advertising targeted to children under 13 years of age.

ACTION FROM CONFERENCE:

Moved: V. Sterling (Toronto)

Seconded: J. Butt (Leeds-Grenville Lanark)

Resolution CARRIED AS AMENDED

alPHA RESOLUTION A09-4

TITLE: Trans Fat in the Food Supply

SPONSOR: Simcoe Muskoka District Health Unit

WHEREAS The World Health Organization (WHO) recommends that people consume no more than 1% of total calories from trans fat or approximately 2 grams trans fat per day in 2000 calories¹;

WHEREAS The average consumption in Canada is 4.9grams per day, two-and-a-half times the WHO limit, and some boys (5%) aged 6-18 consume 11.6 grams per day²; and

WHEREAS Studies have found that for every two per cent of calories coming from trans fat, the risk of coronary artery disease increases by 23 per cent^{3,4}; and

WHEREAS the leading cause of death in Ontario is cardiovascular disease⁵; and

WHEREAS In 2006 Federal Trans Fat Task Force provided recommendations to the federal Minister of Health on how to reduce trans fat intake in Canadians' diet (Appendix B); and

WHEREAS On June 20, 2007, the Federal Minister of Health gave food industry two years to achieve the trans fat limits specified by the Federal Task force; and

WHEREAS In 2006 and 2007 several Ontario Boards of Health, as well as the Association of Local Public Health Agencies endorsed the recommendations of the Trans Fat Task Force (2006) and urged the Federal Government to regulate trans fat in the Canadian food supply; and

WHEREAS Health Canada's February 2009 survey of trans fat levels in the Canadian food supply⁶ shows continued high levels of trans fat in noodles, crackers, cookies, donuts, pies and other snacks and baked goods. Of the 517 grocery and fast food products examined, nearly one-quarter (117) still fail to meet the limits accepted by former Federal Minister of Health, Tony Clement; and

WHEREAS Some Canadian provinces and municipalities (Appendix A) have recently taken steps to regulate the level of trans fat in the food supply;

NOW THEREFORE BE IT RESOLVED that the Association of Local Public Health Agencies (alPHA) urge the Federal Minister of Health to take immediate steps to amend the Food and Drug Act or regulations to restrict the levels of synthetic trans fat permitted in foods to the limits recommended by the Federal Trans Fat Task Force (2006);

AND FURTHER that alPHA urge the Government of Ontario to take immediate steps towards regulating trans fat levels in foods and beverages available in Ontario food premises, including, but not limited to, supporting Bill 156 Healthy Decisions for Healthy Foods (See Appendix A),

AND FURTHER that alPHA urge the Government of Ontario to, in keeping with recent measures taken by the Government of British Columbia, take immediate steps towards regulating trans fat levels in foods and beverages available in Ontario foodservice operations;

AND FURTHER that alPHA urge the Government of Ontario to expand the trans fat regulations of Bill 8 Healthy Foods for Healthy Schools to include all foods available or provided (not just sold) by Ontario schools;

AND FURTHER that alPHA urge Ontario boards of health and municipalities to consider taking actions to regulate trans fat served in local food premises such as has been done in the cities of Calgary, Montreal and Toronto;

AND FURTHER that alPHA urge the Chief Public Health Officer of Canada, and all local boards of health to take actions towards regulating trans fat in the food supply within their jurisdiction.

ACTION FROM CONFERENCE:

Moved: J. Pfaff (Simcoe Muskoka)

Seconded: G. Chartrand (Porcupine)

Resolution CARRIED

References:

¹ Health Canada. TRANSforming the Food Supply. Report of the Trans Fat Task Force Submitted to the Minister of Health. June 2006.

² Health Canada. TRANSforming the Food Supply. Report of the Trans Fat Task Force Submitted to the Minister of Health. June 2006

³ Mozaffarian D., Katan MB., Ascherio A., Stampfer, MJ., Willet WC. Trans Fatty Acids and Cardiovascular Disease. New Eng J Med 2006;354:1601-13.

⁴ Health Canada. TRANSforming the Food Supply. Report of the Trans Fat Task Force Submitted to the Minister of Health. June 2006.

⁵ Ontario MOHLTC. Mortality Data 2000-2004, Provincial Health Planning Database (PHPDB) Extracted July, 2007.

⁶ Health Canada. February, 2009. Accessed Online March 24, 2009 at <http://www.hc-sc.gc.ca/fn-an/nutrition/gras-trans-fats/tfa-age3-eng.php#results>.