

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 Dietitians in
Public Health

June 8, 2023

Consultation Lead,
Bureau of Policy, Intergovernmental and International Affairs,
Food Directorate, Health Products and Food Branch, Health Canada
251 Sir Frederick Banting
Postal Locator 2204C
Ottawa, ON K1A 0K9

Re: Restricting Marketing to Children

On behalf of the Association of Local Public Health Agencies (alPHa) and its Council of Ontario Medical Officers of Health, Boards of Health Section and Affiliate Organizations, we are writing in support of the progress being made on the promise to enact restrictions on the marketing of food high in sodium, sugars, and saturated fat to kids.

We are very pleased that the process of drafting regulations has begun, and that a commitment to introduce them by spring of next year has been made. This is an outcome that our members have been calling for for nearly 15 years and we are looking forward to the implementation of these measures to protect Canadian children from the aggressive advertising that we all agree is detrimental to their long-term health.

We will remind you that alPHa has passed two resolutions on marketing to children, both of which are attached. The first is related to food and beverages specifically, and it is based on the extensive evidence that most food and beverage advertising aimed at children is for unhealthy products that contribute to long-term health issues. The second covers marketing more broadly and is based on the evidence that direct marketing to children is, by definition, manipulative.

We are pleased that restrictions on the commercial marketing of food and beverages to children has remained a key clause in the Minister of Health's mandate letter since 2015, and that it was one of the key objectives of Canada's Healthy Eating Strategy, announced in 2016. With seven years having passed since the Healthy Eating Strategy was announced and with many of its objectives having already been achieved, the time for implementing this one has come.

Several bills have been introduced during this time, each of which has provided a ready-made enforceable legislative framework for this important intervention, and Quebec's Consumer Protection Act, which has prohibited ads directed at children since 1980, demonstrates the practical experience following implementation.

Given the evidence of the harms, support from all parties, and opinion polls consistently showing strong public support, there is no reason to wait any longer to take the appropriate action to ensure that the health and wellbeing of children throughout the country are protected from aggressive industry marketing.

We look forward to working with you and would welcome the opportunity to discuss this further with you and your staff. To schedule a meeting, please have your staff contact Loretta Ryan, Executive Director, alPHA, at loretta@alphaweb.org or 647-325-9594.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Trudy'.

Trudy Sachowski,
President

Copy: Dr. Kieran Moore, Chief Medical Officer of Health (Ontario)
Dr. Theresa Tam, Chief Public Health Officer, Canada
Christine Allum, Senior Manager, Campaigns, Policy & Advocacy, Canada - Heart & Stroke

The Association of Local Public Health Agencies (alPHA) is a not-for-profit organization that provides leadership to Ontario's boards of health. alPHA represents all of Ontario's 34 boards of health, medical officers and associate medical officers of health, and senior public health managers in each of the public health disciplines – nursing, inspections, nutrition, dentistry, health promotion, epidemiology, and business administration. As public health leaders, alPHA advises and lends expertise to members on the governance, administration, and management of health units. The Association also collaborates with governments and other health organizations, advocating for a strong, effective, and efficient public health system in the province. Through policy analysis, discussion, collaboration, and advocacy, alPHA's members and staff act to promote public health policies that form a strong foundation for the improvement of health promotion and protection, disease prevention and surveillance services in all of Ontario's communities.

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