



Association of Local
PUBLIC HEALTH
Agencies

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

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March 4, 2022

Rt. Hon. Justin Trudeau, P.C., M.P.
Office of the Prime Minister of Canada
House of Commons
Ottawa, Ontario K1A 0A6

Hon. Jean-Yves Duclos, P.C., M.P.
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Dear Prime Minister Trudeau and Minister Duclos,

Re: Healthy Eating Strategy

On behalf of member Medical Officers of Health, Boards of Health and Affiliate organizations of the Association of Local Public Health Agencies (alPHa) in Ontario, I am writing to ask for accelerated action on Canada's Healthy Eating Strategy to improve population health by making it easier for Canadians to eat well.

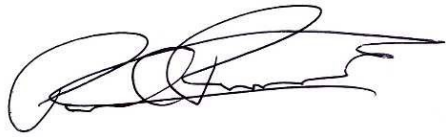
We noted with interest that the Minister of Health's 2021 mandate letter included a direction to promote healthy eating by advancing the Healthy Eating Strategy, with specific instruction to finalize front-of-package labelling to promote healthy food choices and support restrictions on the commercial marketing of food and beverages to children. Healthy eating has long been recognized as a critical area for advancing population health, and we are especially pleased that restricting the commercial marketing of unhealthy food and beverages to children remains a priority.

We will take this opportunity to remind you that our members have taken a specific position on this, as reflected in the attached alPHa resolution, which calls for a strong regulatory approach to banning commercial advertising of food and beverages targeted to children under 13 years of age. We do not believe that the industry driven voluntary approaches have been at all successful, and proposed government regulation is something that has widespread public support as well as ours. Canadians should not have to compete against multibillion dollar corporations to shape children's eating habits.

Although our members have been preoccupied with the COVID-19 response for the last two years, we are acutely aware of the many indirect health impacts of the pandemic, including those related to poorer nutrition. Our members have a specific mandate under the Ontario Public Health Standards to address healthy eating as a key factor in chronic disease prevention, and we will need to make an extra effort to reverse such setbacks. We believe that advancing all aspects of Canada's Healthy Eating Strategy, including a regulatory framework for restricting marketing to children, will make important contributions to our efforts.

Restoring optimal population health as we emerge from the acute phase of this pandemic will be a top priority for our members and it is going to require a substantial, multisectoral effort. As healthy eating is one of the most important factors in overall health, we are urging the swift implementation of Canada's Healthy Eating Strategy and we look forward to reinforcing it in Ontario with our ongoing efforts to address nutrition as a key public health issue.

Sincerely,



Dr. Paul Roumeliotis,
alPHA President

COPY:

Dr. Theresa Tam, Chief Public Health Officer, Public Health Agency of Canada

Dr. Stephen Lucas, Deputy Minister, Health Canada

Pam Aung Thin, Associate Assistant Deputy Minister, Health Canada

Rebecca Caldwell, Senior Policy Advisor, Prime Minister's Office

Jean-Sebastien Bock, Director of Policy, Office of the Minister of Health

Doug Roth, CEO, Heart & Stroke

ENCL.

The Association of Local Public Health Agencies (alPHA) is a not-for-profit organization that provides leadership to the boards of health and public health units in Ontario. 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.