

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

February 15, 2019

ALL ONTARIO SENATORS
The Senate of Canada
Ottawa, Ontario, Canada K1A 0A4
VIA E-MAIL

Honourable Ontario Senators,

Re: Bill S-228, Child Health Protection Act

On behalf of the Association of Local Public Health Agencies (alPHa) and its member Medical Officers of Health, Boards of Health and Affiliate organizations, I am writing today to express our full support for Bill S-228, which, if passed into law, would prohibit certain food and beverage marketing directed at children.

alPHa has long advocated for a regulatory approach to limiting marketing to children, having recognized that industry's voluntary and self-regulating regime is extraordinarily weak and, in many cases, demonstrably dishonest.

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. The first is based on the extensive evidence that marketing food and beverages to children has a significant negative impact on their food and beverage choices, as foods and beverages marketed to children are predominantly unhealthy and unhealthy food and beverage choices are contributing to obesity and its associated chronic diseases. The second is based on the evidence that direct marketing to children is by definition manipulative. I am pleased to attach both for your reference.

Indeed, we were very pleased to see that one of the key recommendations of the 2016 Canadian Senate Report, *[Obesity in Canada: Whole-of-Society Approach for a Healthier Canada](#)* was for 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".

We were of course also delighted with the subsequent introduction of Bill S-228, which provides a ready-made legislative model for what such intervention could look like across Canada, and that it has reached the stage where it is on the verge of being passed into law.

The time is right to implement an enforceable legislative framework that protects child health by protecting them from predatory marketing practices. The pioneering Quebec system has been in place for over 35 years and the evidence for restricting marketing to kids to protect their health has never been more clear. Moreover, public opinion polls have shown that more than 80% of Canadians approve of government intervention to limit advertising of unhealthy food and beverages to children.

Unhealthy eating patterns are a major risk factor for a number of chronic conditions, including heart disease, cancer, and diabetes. These constitute a measurable burden on our health care system and considerable societal and economic costs. We know that such patterns are established early in life and that creating environments that support healthy eating must be a top public health priority. This must include placing stronger limits on the aggressive marketing of unhealthy food and beverages to our children.

We believe that passing Bill S-228 is a necessary and important step in improving the health of future generations of Canadians and we urge you to vote in its favour.

Sincerely,



Dr. Robert Kyle,
President

Copy: Rt. Hon Justin Trudeau, Prime Minister of Canada
Hon. Ginette Petitpas Taylor, Minister of Health
Dr. Theresa Tam, Chief Public Health Officer of Canada
Dr. David Williams, Chief Medical Officer of Health (Ontario)

Encl.

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 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 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