



Submission to the Standing Committee on Health Study on Children's Health

June 9, 2022

Introduction:

The Stop Marketing to Kids Coalition is made up of 10 non-governmental organizations including Childhood Obesity Foundation, Heart & Stroke, Alberta Policy Coalition for Chronic Disease Prevention, BC Alliance for Healthy Living, Canadian Cancer Society, Canadian Dental Association, Chronic Disease Prevention Alliance of Canada, Diabetes Canada, Food Secure Canada and the Quebec Coalition on Weight-Related Problems. The Stop Marketing to Kids Coalition is endorsed by over 120 organizations and individuals, including notable health experts concerned about the burden of diet-related disease in Canada. Through cross-sector collaboration and evidence-informed policy development, the Stop Marketing to Kids Coalition encourages policies that adequately protect children from commercial marketing to kids of food and beverages that are high in sugar, salt and saturated fats in Canada.

In particular, our coalition encourages the federal government to implement the remaining measures from Canada's Healthy Eating Strategy, with a focus on restrictions on food and beverage marketing to children under the age of 13. It is an effective way to protect kids and support parents in making healthy food choices. Our food environment should make healthy food decision-making easy for families, and this is one of the effective tools that will help give kids the best start on the road to a long, healthy life.

Scope of the problem:

Kids are eating too much highly processed food

Before the pandemic, ultra-processed food consumption was highest in children 9-13 years, making up nearly 60% of the calories they consumed.¹ Within the first three months of the pandemic, 35% of Canadians increased their consumption of junk foods and sweets.²

Such highly processed or 'ultra-processed foods' undermine healthy eating.³ Most are high in salt, sugars, and saturated fat and are generally low in protein, fibre, vitamins, and minerals.⁴ Increased consumption of ultra-processed food is associated with a higher risk of all-cause mortality⁵ and high consumption is associated with increased risk of obesity, diabetes, and hypertension, compared to lower consumption.⁴

With children and youth (ages 2-18) getting over half of their calories from ultra-processed foods,² and the clear knowledge of the harm to their health, we must act. Before the pandemic, chronic disease impacted by modifiable risk factors like diet cost our health system approximately \$26 billion a year.^{6,7} Given the stresses the pandemic placed on individuals, our economy and the health system, it is imperative we implement measures to encourage and support healthy eating.

Food and beverage marketing affects children

Each year, the Canadian food and beverage industry spends \$1.1 billion on marketing to children.⁸ This marketing appeals to children through product design, the use of cartoon or other characters, fantasy and adventure themes, humour, and other marketing techniques.⁹ Clearly these techniques work, with children as young as three who are brand aware and can recognize or name food and beverage brands.^{10,11}

This marketing to children means:

- Over 50 million food and beverage ads per year are shown on children's top 10 websites,¹² and their personal identifying information is collected from websites and apps for the purpose of targeted online marketing.^{13,14}
- Children in Canada are observing an estimated 1,500 advertisements annually on social media sites alone.¹⁵
- Nearly 90% of food and beverages marketed on television and online are high in salt, sugars or saturated fat.^{12,16}

We need to protect children from the harmful effects of food and beverage marketing and support parents as they help their children develop healthy eating habits and food preferences.

Policy recommendation:

The Stop Marketing to Kids Coalition recommends that the federal government introduce regulations to restrict the marketing of food and beverages high in salt, sugars and saturated fat to children, in Canada Gazette I by Fall 2023, as per Health Canada's most recent Forward Regulatory Plan. We recommend that the federal government firmly adhere to this timeline.

There has been extensive study, debate, and public support to make healthy eating easier for people in Canada through restrictions on marketing of food and beverages high in salt, sugars and saturated fat.

From 2016 to 2019, the Stop Marketing to Kids Coalition mobilized the voices of thousands to advocate for Bill S-228, a federal act to restrict the marketing of certain food and beverages. After unanimous support in the Senate, this bill was subsequently passed by the majority of MPs in the House of Commons. The bill faltered when it returned to the Senate for final approval - despite having the support of the majority of Senators – it was filibustered and could not be put to a vote.

In May 2022, the Stop Marketing to Kids Coalition expressed support for Private Member's Bill C-252 that aims to restrict food and beverage marketing directed at persons under 13 years of age. While we are supportive of parliamentary efforts to address this issue, government should not delay the implementation of regulations in order to wait for these parliamentary efforts to conclude.

Health Canada's Forward Regulatory Plan for 2022-2024 includes the introduction of draft regulations in Canada Gazette I by Fall 2023, to restrict the marketing of food and beverages high in salt, sugars and saturated fats to children. Our coalition strongly encourages the federal government to abide by this commitment and timeline while Parliament reflects on Bill C-252.

These draft regulations should:

- Be informed by the best available evidence, expert opinion, and consultations with stakeholders.
- Include strong monitoring of the regulations to assess impact and whether further restrictions are necessary.
- Be as comprehensive as possible with respect to media, settings, and marketing techniques to achieve optimal protection of children’s health.

Restrictions on marketing to children are among the most cost-effective and impactful childhood obesity interventions.¹⁷⁻²⁰ A US study estimates a television fast food advertising ban could reduce the number of children (3-11) who are overweight by 18%.²¹ In Canada, an analysis of Quebec’s marketing legislation found that French speaking households with children had a 13% lower propensity to consume fast food than English speaking households with children, who had access to unregulated English language US broadcasts.²⁰ The difference in the propensity to consume translated to 13.4 billion fewer fast-food calories per year.²⁰

Voluntary codes are not effective at managing the problem of marketing food and beverages high in salt, sugars and saturated fat to kids.²²⁻²⁴ For the past 10 years industry has set its own standards and self-regulated marketing. In June 2021, the food and beverage industry revised their voluntary code to reduce marketing to children. The nutrition criteria are robust, but the accompanying rules of application have significant loopholes rendering substantially less protection than the regulatory regime currently in place in Quebec.

Mandatory regulations would protect children, assist families in exercising informed choices in purchasing and consuming foods and beverages, and support healthier lifestyles.

Conclusion:

Parents want their kids to develop healthy eating habits, but they are at a significant disadvantage against the millions of dollars industry spends targeting kids with ads for food and beverages.

Canada’s Healthy Eating Strategy, under its objective to protect vulnerable populations, includes restricting advertising of food and beverages high in salt, sugars, and saturated fat to children. This commitment to restrict marketing to kids was included in the government’s 2015 and 2021 election platforms, the 2019 federal budget and four mandate letters, including most recently the Minister of Health’s 2021 mandate letter. It is time these commitments be formalized with the introduction of draft regulations in Canada Gazette I by Fall 2023, as per Health Canada’s Forward Regulatory Plan.

Healthy eating is one of the most important things we can do for overall health and restricting marketing to kids is a key and effective tool that will make it easier for kids to eat healthy.



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