



Tuesday October 31, 2017

Child Care Modernization  
c/o Early Years Division Ministry of Education  
900 Bay Street, 24th floor, Mowat Block  
Toronto, ON M7A 1L2

By email: [CCGE\\_modernization@ontario.ca](mailto:CCGE_modernization@ontario.ca)

**Re: Feedback on the Regulatory Registry related to the *Child Care and Early Years Act, 2014***

We are writing to provide feedback to the Ministry of Education on the Regulatory Registry Posting related to supporting the Renewed Early Years and Child Care Policy Framework, 2017 under the *Child Care and Early Years Act, 2014*. Our recommendations are specifically related to nutrition.

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) is the official voice of public health nutrition professionals in Ontario and represents registered dietitians working in the 36 public health units across the province. Many of our members collaborate with child care providers providing nutrition support, screening tools and menu reviews as well as training for child care staff.

The comments and recommendations provided are founded in the understanding that optimization of child learning, health and well-being begins prior to school entry. Furthermore, child care and early years programs, together with caregivers and the environment, play a crucial role in the healthy development of children.<sup>1</sup> In addition, many of the recommendations align with the Healthy Kids Panel report *No Time to Wait: the Healthy Kids Strategy* presented to the Minister of Health and Long-Term Care in March 2013.<sup>2</sup>

#### **A. Areas of the Regulatory Registry Posting that Gained Support**

We support many of the changes implemented throughout the phased approach to the development of new updated regulatory requirements under *CCEYA, 2014*. These include:

- Requiring healthy meals, snacks and beverages to be based on *Canada's Food Guide*, *Canada's Food Guide – First Nations, Inuit and Métis* and *Nutrition for Healthy Term Infants*.
- Making drinking water available to children at all times.
- Posting up-to-date menus and any changes that have been made.
- Strengthening the support for children with food allergies/restrictions.
- The addition of a requirement prohibiting any actions that could result in bodily harm to a child including feeding children against their will.



While we support many of the regulations and amendments proposed related to food and nutrition, as noted above, we highlight recommendations that would further strengthen the regulations related to children's nutrition, health and well-being and their enforcement.

## **B. Recommendations to Strengthen Child Care Nutrition Regulations**

### **1. Develop policies for child care in Ontario to ensure supportive nutrition environments in licensed programs.**

Similar to the [\*Minister's Policy Statement on Programming and Pedagogy\*](#), we recommend that the Minister of Education release a policy statement that obligates licensed child care programs to implement the [\*Practical Guide on Menu Planning and Supportive Nutrition Environments\*](#).

### **2. Remove Regulation 42(1)(a) regarding parent's instructions for feeding infants under one year of age.**

Regulation Section 42(1)(a) currently mandates adherence to parents' written instructions for feeding a child under one year old. This does not allow for a process of negotiation with parents; nor does it provide child care staff opportunity to seek advice from registered dietitians when they are concerned that parents' instructions contradict the recommendations set out in *Nutrition for Healthy Term Infants* as per Section 42(2) no.5. (e.g. introducing solid foods too early or too late).

OSNPPH recommends that this issue be addressed by:

- Removing regulation 42(1)(a) recognizing that regulation Section 44 (Special Arrangements) as currently stated adequately addresses parents' requests for special feeding protocols that are not met through *Canada's Food Guide* and/or *Nutrition for Healthy Term Infants*.
- Using the parent hand book, as per section 45(1)(a), as a tool to inform parents that feeding recommendations (such as those outlined in the *Canada's Food Guide* and *Nutrition for Healthy Term Infants*) are regulated requirements for all child care centres in Ontario.

### **3. Include a regulation that child care operators establish policies describing their approach to supporting, promoting and protecting breastfeeding.**

Health Canada recommends that all healthy term infants be exclusively breastfed for the first six months of life and then continue to be breastfed up to two years of age and beyond, with the addition of safe and appropriate complementary foods.<sup>3,4</sup> In addition, the Healthy Kids Panel report recommends supporting breastfeeding for at least the first six months of



life (*Healthy Kids Panel Recommendation 1.4*). Child care providers play a key role in supporting mothers in their decision to breastfeed by ensuring:

- Mothers are welcome to breastfeed on-site.
- Staff are aware of the benefits of breastfeeding.
- Staff are aware of how to store and feed breast milk safely.

## C. Recommendations to Support Implementation and Enforcement of Nutrition Regulations

### 1. Provide adequate menu planning tools and resources for child care operators.

To assist child care operators, we recommend that the Ministry of Education consider developing an online menu-building tool that child care operators could access to create menus using a bank of recipes and/or menu templates pre-approved by a Registered Dietitian. This would ensure menus meet the standards while reducing the burden that individual menu reviews could place on Registered Dietitians working in public health units. Comprehensive menu-planning resources and supports should be developed for child care providers for whom online menu-building tools are not deemed suitable.

### 2. Ensure that early childhood educators receive training in nutrition from a Registered Dietitian.

The Healthy Kids Panel report recommends developing the knowledge and skills of key professionals, including early childhood educators, to support parents in raising healthy kids (*Healthy Kids Panel Recommendations 3.5*). The Ministry should ensure that early childhood educators receive standardized training by a Registered Dietitian that includes a review of the new regulations and nutrition standards; nutritional requirements of young children; dietary restrictions and allergies; and the importance of creating a healthy, supportive eating environment for children. Adequate funding should be provided for this to occur.

### 3. Strengthen the current compliance indicators used for the purposes of renewing licences and to monitor whether a program is meeting [provincial licensing requirements](#). Clearer statements based on [Practical Guide on Menu Planning and Supportive Nutrition Environments](#) will assist licensing staff in providing practical guidance regarding the provision of healthy foods and beverages to children in care.

We are optimistic and look forward to our continued collaboration with the Ministry of Education to promote recently-developed [provincial nutrition recommendations](#) for child care operators that translate *Canada's Food Guide* and *Nutrition for Healthy Term Infants* into clear and practical guidelines for foods and beverages offered to children. Employing these



Ontario Society of Nutrition  
Professionals in Public Health

La société ontarienne des professionnel(le)s  
de la nutrition en santé publique

[www.osnp-ph.on.ca](http://www.osnp-ph.on.ca)  
[info@osnp-ph.on.ca](mailto:info@osnp-ph.on.ca)

@RDsPubHealthON

guidelines will result in consistent minimum standards for food and beverages offered to children in child care settings.

Thank you for the opportunity to provide feedback to the Ministry of Education on the Regulatory Registry Posting related to supporting the Renewed Early Years and Child Care Policy Framework under the *Child Care and Early Years Act, 2014*, to support the Government of Ontario's child care modernization agenda.

Sincerely,

Erinn Salewski, RD MSc  
OSNPPH Co-chair Year 2

Laura Abbasi, RD MHSc  
OSNPPH Childcare Working Group Co-Chair



## References

1. Government of Ontario. How Does Learning Happen? Ontario's Pedagogy for the Early Years; 2014 [cited 2016 Mar 3]. Available from: <https://www.edu.gov.on.ca/childcare/HowLearningHappens.pdf>
2. Healthy Kids Panel. No Time to Wait: The Healthy Kids Strategy; 2013 [cited 2016 Mar 3]. Available from: [http://www.health.gov.on.ca/en/common/ministry/publications/reports/healthy\\_kids/healthy\\_kids.pdf](http://www.health.gov.on.ca/en/common/ministry/publications/reports/healthy_kids/healthy_kids.pdf)
3. Health Canada; Canadian Paediatric Society; Dietitians of Canada; Breastfeeding Committee for Canada. Nutrition for Healthy Term Infants: Recommendations from Birth to Six Months; 2012 [cited 2016 Mar 3]. Available from: <http://www.hc-sc.gc.ca/fn-an/nutrition/infant-nourisson/recom/index-eng.php>.
4. Health Canada; Canadian Paediatric Society; Dietitians of Canada; Breastfeeding Committee for Canada. Nutrition for Healthy Term Infants: Recommendations from Six to 24 Months; 2013 [cited 2016 Mar 3]. Available from: <http://www.hc-sc.gc.ca/fn-an/nutrition/infant-nourisson/recom/recom-6-24-months-6-24-mois-eng.php>.