



Ontario Society of Nutrition
Professionals in Public Health

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

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The Honorable Deb Matthews
Minister of Health and Long Term Care,
Deputy Premier
Ministry of Health and Long-Term Care
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, Ontario M7A 2C4

November 11, 2013

RE: Consultation on Marketing of Unhealthy Food and Beverages to Children

Dear Minister Matthews:

We are writing you in follow-up to the Ministry of Health and Long-Term Care (MOHLTC) consultations, to offer our recommendations on marketing of unhealthy food and beverages to children.

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) is the independent and official voice of over 200 Registered Dietitians (RDs) working in Ontario's public health system. OSNPPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents.

OSNPPH congratulates your ministry on its leadership on the important public health issue of childhood obesity through acting on several of the Healthy Kids Panel (HKP)'s report recommendations, beginning with enhanced breastfeeding supports and with more investment in student nutrition programs. Government actions on menu labelling legislation and marketing of unhealthy food and beverages to children are also integral steps to tackling this issue.

As a key stakeholder, OSNPPH has been very pleased for the opportunity to participate in the Ministry consultations on marketing to children. This is a very complex and widely-debated topic, but there is also a strong and urgent need to move beyond the status quo to improve the health and well-being of children in Ontario. Recognizing your Ministry as the foundation of public health for the province, we urge you to support our recommendations as follows on marketing to children.

It is the position of OSNPPH that the government of Ontario should implement legislation that prohibits all commercial advertising targeted to children under 13 years of age.



The following principles should form the basis for the government's approach and actions:

- **Protect children's rights:** Children lack adequate cognition to understand the effects of advertising, so their right to grow and develop without being advertising targets must be protected.
- **Build supportive environments:** Food environments need to be more supportive of healthy choices. Advertising is a key factor to this. In the case of children under the age of 13 years, any type of advertising -- including but not limited to food advertising -- is manipulative. Eliminating advertising targeted at children is a vital step towards environments supportive of making healthy choices the easier choices for both parents and children.
- **Avoid food categorization:** A total ban on advertising to those under 13 years of age primarily protects the health and well-being of children. A ban also serves to nullify counter-productive debate on defining 'healthy' versus 'unhealthy' foods and prevents exploitation of "loopholes" through the miscategorization of foods and beverages.
- **Consult key experts:** Advisement from experts on child development, supplemental guidance from the health sector such as nutrition professionals, and from aligned areas such as media literacy and communications, will ensure that legislation is informed by comprehensive expertise.
- **Define commercial advertising broadly:** Regulations should encompass other forms of marketing to children (e.g., toys, point-of-sale prompts and "adver-games").
- **Spur complementary action:** Ontario's leadership on advertising to children should also include a call to action to other jurisdictions for complementary regulations on advertising to children, including by the federal government (however, national programs such as the Canadian Children's Food and Beverage Advertising Initiative should be excluded because self-regulation by the food and beverage industry has proven to be insufficient).

To protect the right of children to grow-up free of being targets of commercial advertising, to support parents, and to create healthier environments, we strongly urge you to act on the above recommendations. We would be pleased to further discuss this with you.

Sincerely,

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cc The Honorable Kathleen Wynne, Premier of Ontario
Ministry of Child and Youth Services
Ministry of Consumer Service
Ministry of Education
Ministry of Agriculture and Food



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Appendix A: OSNPPH Position Statement – Commercial Advertising to Children

As Registered Dietitians working in the public health sector, we urge the Premier of Ontario to implement legislation that prohibits all commercial advertising targeted to children under 13 years. Children lack adequate cognition to understand the effects of advertising, so their right to grow up without being advertising targets must be protected. As well, eliminating advertising targeted at children creates environments supportive of healthy choices being easier choices. A comprehensive ban on all advertising to children under 13 years is the best public health approach.