



February 28, 2014

Early Years Division
Ministry of Education
900 Bay Street, 24th floor Mowat Block
Toronto, ON M7A 1L2

By email: CCGE_modernization@ontario.ca

Re: Feedback on proposed regulatory changes under the Day Nurseries Act (DNA)

We are writing to provide feedback to the Ministry of Education regarding proposed regulatory changes to Regulation 262 under the Day Nurseries Act, specifically those changes 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 in Ontario.

Nutrition in the early years affects mental, emotional and physical development as highlighted by the *Early Years Study 3*.¹ Health outcomes from poor nutrition, such as anemia, failure to thrive, and obesity, can negatively affect indicators of school readiness included in the Early Development Instrument, such as motor coordination, attention, behaviour and energy levels. Children spend approximately 40% of their waking hours in early childhood education settings making child care a major influence of young children's eating habits.

The recommendations provided herein are founded in the understanding that optimization of child learning and well-being begins well before school entry. In addition, many 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 2013.² This report contains a set of recommendations to help the Ontario Government reach its target of reducing childhood obesity by 20 percent over five years.

Nutrition Requirements:

1. Base nutrition guidelines for children under age two on *Nutrition for Healthy Term Infants from Birth to Six Months* and *Six to 24 Months*.

Updating nutrition regulations to reflect current recommendations from Health Canada in Canada's Food Guide to Healthy Eating is an excellent first step to better nutrition for children. Canada's Food Guide, however, only applies to children ages 2 and over. Health Canada, Canadian Pediatric Society, Dietitians of Canada and the Breastfeeding Committee of Canada have recently released a joint statement titled *Nutrition for Healthy Term Infants from Birth to Six Months* and will release *Nutrition for Healthy Term Infants from Six to 24 Months* in April 2014.^{3,4} Dietitians working in public health promote these nutrition recommendations for children under age 2, and thus the Ministry of Education should



consider these recommendations along with OSNPPH's *Pediatric Nutrition Guidelines* when developing provincial nutrition regulations for child care settings.⁵

2. Develop provincial nutrition guidelines and standards for all child care settings.

We recommend that separate nutrition guidelines and standards be developed outside legislation, which can be updated in a timely manner in accordance with changes to Canada's Food Guide or best practice recommendations. Provincial nutrition guidelines should include details of how child care centres and staff can create healthy and supportive eating environments as recommended by the Healthy Kids Panel (*Recommendation 3.4*).² One set of nutrition guidelines where children learn and play (*Healthy Kids Panel Recommendation 2.10*) will ensure consistency between settings and decrease confusion for staff when there are multiple child care programs in one location.² The Government of Alberta, Prince Edward Island Department of Education and Early Childhood Development, Yukon Health and Social Services, Government of Newfoundland and Labrador, and Government of Nova Scotia have provincial- and territorial-level nutrition guidelines and standards for child care settings.⁶⁻¹⁰ In Ontario schools, OSNPPH supports the use of Nutrition Tools for Schools Nutrition Standards.¹¹ Nutrition Tools for Schools expands upon legislative requirements defined by the Ministry of Education's School Food and Beverage Policy (PPM 150) Nutrition Standards by applying to foods offered *and* sold, and including a new category of food and beverages that meet or exceed the PPM 150 Nutrition Standards and provide Maximum Nutritional Value.^{11,12} Ottawa Public Health has created *Childcare Healthy Eating and Active Living Guidelines (Appendix A)* and a *Nutrition Standard for Healthy Eating Guidelines (Appendix B)* which can serve as example of guidelines that can be implemented in the child care setting.

3. Develop clearer regulations pertaining to the management of dietary restrictions.

Dietitians working in public health have noted increased demand by parents for dietary restrictions at child care centres, at times without written consent from a physician. Some child care centres have chosen to implement centre-wide bans on nutritious foods such as dairy products and eggs. This practice does not prevent, and may even increase the risk of food allergies according to a recently released joint statement by the Canadian Pediatric Society and the Canadian Society of Allergy and Clinical Immunology.¹³ This practice also poses an increased risk for malnutrition for all children. Regardless of whether there is a centre-wide ban of allergenic foods or if dietary modifications are provided only for those children of parents who have requested modifications, it is essential that appropriate alternatives are provided. We recommend that the Ministry develop clearer regulations pertaining to the management of dietary restrictions and that these regulations reflect current scientific evidence. Furthermore, we recommend that staff require ongoing training on management of allergies and dietary restrictions. Ottawa Public Health is in the process of developing a decision map for handling allergies and diet preferences to accompany their *Childcare Healthy Eating and Active Living Guidelines*, which can be referred to in the future for guidance.

4. Mandate that licensed child care centres follow Baby-Friendly Initiative guidelines.¹⁴

Health Canada recommends that all healthy term infants be exclusively breastfed for the first six months of life and then continue to be breastfed, with the addition of safe and appropriate complementary foods, up to two years of age and beyond. As accredited Baby-Friendly facilities, Ontario public health units work with community partners including child care centres and Early Years Centres to promote informed decisions around infant feeding as well as breastfeeding-friendly environments. 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*).² We recommend that the Ministry mandate licensed child care centres to follow Baby-Friendly Initiative guidelines (e.g. providing a private space where mothers can breastfeed, guidelines on how to support breastfeeding mothers and no distribution of formula samples among others). In addition, guidelines for the safe storage of breast milk should be provided to parents who choose to continue breastfeeding while their child is in care.

5. Provide clearer guidance on the menu review process.

The statement regarding menu review by a Registered Dietitian is welcome; however, this statement requires greater clarity and specificity regarding the review process, including frequency, review criteria and documentation. It should be noted that while we are supportive of this requirement, it might place a financial burden on child care centres if they must hire a dietitian or on public health units who have limited nutrition staff.

Policy Statement to Guide Program Content and Educator Practice:

6. Ensure that early childhood professionals receive training in nutrition.

Early Learning for Every Child Today (ELECT): A framework for Ontario early childhood settings recognizes that knowledgeable, responsive early childhood professionals are required for optimal child development.¹⁵ In addition, the Healthy Kids Panel report recommends developing the knowledge and skills of key professions, including child care staff, to support parents in raising healthy kids (*Healthy Kids Panel Recommendations 3.5*).² Therefore, the Ministry should ensure that early childhood professionals 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.

7. Encourage curriculum that supports age-appropriate activities for learning about food and nutrition.

ELECT also recognizes that a planned curriculum supports early learning.¹⁵ Programs of activities should include opportunities for children to be actively engaged in mealtimes through service or clean up. Curriculum should include age-appropriate activities for learning about food and nutrition and incorporate Canadian resources. See Ottawa Public Health's *Childcare Healthy Eating and Active Living Guidelines* (Appendix A, Section C titled "Healthy and Supportive Eating Environment").

First Aid Training:

8. Mandatory CPR and EpiPen Training for staff.

To ensure safety of all children in care, we recommend the Ministry of Education mandate CPR and EpiPen training for at least 50% of staff in addition to first aid training.

Other Considerations:

9. Develop an online menu-building tool or other comprehensive menu planning resource for child care centres.



To assist child care centres in adhering to the aforementioned provincial guidelines, we recommend that the Ministry of Education develop an online menu-building tool that child care providers can access to create menus from a bank of recipes and menu templates pre-approved by a Registered Dietitian. This would ensure menus meet the guidelines while reducing the burden individual menu reviews could place on dietitians working in public health units. Approving individual menus could prove to be an insurmountable task particularly for health units servicing 500+ child care centres and/or health units with limited nutrition staff. Comprehensive menu-planning resources and supports should be developed if an online menu-building tool is deemed not suitable for child care providers. See Ottawa Public Health's *Six Week Menu Plan (Appendix C)* as an example of work already done in this area.

10. Hire a Registered Dietitian to oversee the development of the provincial nutrition guidelines and associated supports.

The Ministry of Education should hire a Registered Dietitian to oversee the development of the provincial nutrition guidelines and standards, the online menu-building tool (or other supports), to approve menus, and to support child care centres in providing a healthy eating environment. A group of OSNPPH members with expertise in child nutrition and experience providing training and nutrition support for local child care providers are willing to support the MEDU in the development of the Day Nurseries Act nutrition standard and guidelines. Contact with this group can be made through Barb Bartle, Registered Dietitian, Brant County Health Unit at 519 753-4937 extension 349.

11. Mandate that child care centres partner with their local public health units.

Through this partnership, child care centres can provide parents with screening tools for their children's health and development (i.e. Nipissing District Developmental Screen, NutriSTEP® Nutrition Screening Tool for Toddlers and Preschoolers).

Thank you for the opportunity to provide feedback on proposed regulatory changes under the Day Nurseries Act and the Early Childhood Educators Act, 2007 to support the Government of Ontario's child care modernization agenda.

Sincerely,

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Enclosures:

Appendix A: Ottawa Public Health's *Childcare Healthy Eating and Active Living Guidelines*
Appendix B: Ottawa Public Health's *Nutrition Standard for Healthy Eating Guidelines*
Appendix C: Ottawa Public Health's *Six Week Menu Plan*



References:

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