



May 11, 2015

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

Re: Feedback on the Regulatory Registry Posting 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 the Child Care and Early Years Act, 2014 (CCEYA), 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 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 recommendations provided herein reiterate our earlier feedback provided to the Ministry of Education (Feedback on proposed regulatory changes under the Day Nurseries Act (DNA) – February 28, 2014, available at [www.osnp-ph.on.ca](http://www.osnp-ph.on.ca) - Resources) and are founded in the understanding that optimization of child learning, health and well-being begins well before school entry. 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>1</sup>

**Recommendations:**

- 1. Base nutrition standards on the latest version of *Canada's Food Guide* as well as *Nutrition for Healthy Term Infants from Birth to Six Months* and *Six to 24 Months* for children under age two.**  
We support the requirement that licensed operators be required to follow the latest version of *Canada's Food Guide*; however, *Canada's Food Guide* only applies to children ages two and over. Health Canada, the Canadian Pediatric Society, Dietitians of Canada and the Breastfeeding Committee of Canada have released *Nutrition for Healthy Term Infants from Birth to Six Months*<sup>2</sup> and *Nutrition for Healthy Term Infants from Six to 24 Months*<sup>3</sup> which should guide nutrition recommendations for children under age two, along with OSNPPH's *Pediatric Nutrition Guidelines*<sup>4</sup>.
- 2. Develop provincial nutrition standards for all child care settings.**  
*Canada's Food Guide* and *Nutrition for Healthy Term Infants from Birth to Six Months* and *Nutrition for Healthy Term Infants from Six to 24 Months* provide guidance on healthy eating, however, they are not specific enough to use as reference documents in developing or reviewing menus in child care centres, particularly regarding food quality. Furthermore, these documents provide little



guidance for positive mealtime experiences for children. Without specific standards, licensed operators will establish policies/procedures regarding meals and snacks that may be inconsistent across operators. We recommend that provincial nutrition standards be developed in accordance with *Canada's Food Guide, Nutrition for Healthy Term Infants* and other best practice recommendations that identify minimum standards for food and beverages offered to children. Standards for food and beverages offered should include specific references to processed food, trans fat and sugar-sweetened beverages. These provincial standards should also include details of how child care operators can create positive mealtime experiences and support breastfeeding (see **Recommendation 3**). These provincial standards (*Healthy Kids Panel Recommendation 2.10*) will provide a consistent reference document that licensed operators can use and from which Registered Dietitians can provide rationale for menu approval.

**3. Require menus to be reviewed by a Registered Dietitian.**

Previously, proposed amendments to Regulation 262 under the Day Nurseries Act suggested that licensed operators be required to have menus reviewed by a Registered Dietitian. Menu review by a Registered Dietitian is absent from the current regulatory posting. It should be noted we continue to support the review of menus by a Registered Dietitian, and that child care operators and/or health units be provided with the support and adequate funding to do this. Furthermore, greater clarity and specificity regarding the review process should be included.

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 individual menu reviews could place on Registered Dietitians working in public health units. Comprehensive menu-planning resources and supports should be developed if an online menu-building tool is deemed not suitable for child care providers.

**4. Hire a Registered Dietitian to oversee the development of the provincial nutrition standards and associated supports.**

The Ministry of Education should hire a Registered Dietitian to oversee the development of the provincial nutrition standards, the online menu-building tool (or other supports), to approve menus, and to support child care operators 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 Ministry of Education in the development of these standards. Contact with this group can be made through Tracy McDonough, Registered Dietitian, KFL&A Public Health at 613-549-1232 ext. 1272/tracy.mcdonough@kflapublichealth.ca.

**5. Mandate that licensed child care operators follow Baby-Friendly Initiative guidelines.<sup>5</sup>**

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. 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*). We recommend that the Ministry mandate licensed child care operators to



follow Baby-Friendly Initiative guidelines (e.g. providing a private space for mothers to breastfeed, guidelines on how to support breastfeeding mothers and no distribution of formula sample).

**6. 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.

Thank you for the opportunity to provide feedback on the Regulatory Registry Posting related to the Child Care and Early Years Act, 2014 (CCEYA), to support the Government of Ontario's child care modernization agenda.

Sincerely,

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**References:**

1. Healthy Kids Panel. No Time to Wait: The Healthy Kids Strategy; 2013 [cited 2014 Feb 19]. 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)
2. 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 2015 April 20]. Available from: <http://www.hc-sc.gc.ca/fn-an/nutrition/infant-nourisson/recom/index-eng.php>.
3. 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 2015 April 20]. Available from: <http://www.hc-sc.gc.ca/fn-an/nutrition/infant-nourisson/recom/recom-6-24-months-6-24-mois-eng.php>.
4. Ontario Society for Nutrition Professionals in Public Health. Pediatric Nutrition Guidelines for Primary Care Professionals; 2011 [cited 2014 Feb 25]. Available from: [http://www.osnp-ph.on.ca/resources/YORK-Pediatric\\_Nutrition\\_Guidelines\\_for\\_Primary\\_Health\\_Care\\_Providers-2011.pdf](http://www.osnp-ph.on.ca/resources/YORK-Pediatric_Nutrition_Guidelines_for_Primary_Health_Care_Providers-2011.pdf).
5. Baby Friendly Initiative Ontario. [cited 2015 April 20]. Available from: <http://www.bfiontario.ca/>.