



Policy update on restricting food advertising primarily directed at children: Written response from the Canadian Paediatric Society

June 2023

Summary

The Canadian Paediatric Society (CPS) is pleased to submit the following comments as a part of the Health Canada consultation on the proposed policy on restricting food advertising primarily directed at children. As Canada's national association of paediatricians, paediatric subspecialists and other child and youth health providers, the CPS supports prohibiting the marketing of foods high in sugar, saturated fats and sodium to children. This policy update is a positive step forward towards the implementation of Canada's Healthy Eating Strategy and improved health and nutrition for children in Canada.

Marketing to kids

Prohibiting the marketing of foods high in sugar, saturated fats and sodium to children has the potential to significantly improve overall health. Dietary habits are shaped during childhood and can have life-long impacts on health and well-being. The consumption of ultra-processed foods is directly linked to a multitude of health conditions, including heart disease, stroke, cancers, overweight and obesity, type 2 diabetes and hypertension.

Children and youth deserve to be protected from targeted marketing and industry tactics that negatively influence their food preferences. Over 60 countries have adopted policies that restrict the marketing of food and non-alcoholic beverages to children – including here in Canada, under the Québec Consumer Protection Act. We can and should learn from these examples and implement appropriate legislative and policy change to support healthy eating behaviours and reduce exposure to targeted food advertising in Canada.

Recommendations

Given the significant rise in screen time and exposure to advertisements through social media, mobile applications, and websites, we are particularly supportive of the recognition that any approach to restricting food advertisements primarily directed at children must be adaptable and applicable to a broad range of TV and digital media sources. As such, the CPS strongly supports the comprehensive approach to digital media and the commitment to ongoing monitoring to identify and respond to gaps in policy and practice.

To increase the health benefits of this policy proposal and to achieve its stated objective, we recommend expanding its focus to apply at minimum to children 16 years of age and younger, in accordance with the Ottawa Principles of the Stop Marketing to Kids Coalition. While teenagers may have a greater awareness and understanding of the goals and objectives of advertisements than those under the age of 13, no one is immune from the influences of targeted advertisements and persuasive marketing. At the same time, teenagers can be more susceptible than adults to peer pressure and social influences and are beginning to form their own individual consumption and consumer habits. In lieu of an expanded focus to protect the health of adolescents now, we strongly support sustained monitoring and evaluation on the impacts of this policy on the teenage population.

To increase the ability of the proposed policy to effectively reduce the exposure of children to targeted marketing by means of television advertisements, we recommend that the approach of largely limiting restrictions to only those television programs that are classified as C be broadened. Children are

exposed to a high frequency of ads that are ostensibly designed for a general population, and they view a great deal of television programming with ratings other than C. This narrow approach will also mean that the policy does not regulate the vast majority of programming that older children and pre-teens view. Adopting a time-based approach such as in the UK or Chile whereby the marketing of foods and beverages that do not meet nutrition criteria is banned during certain hours of the day (e.g., 6am to 10pm), would be much more effective than the proposed classification-approach.

Conclusion

We commend Health Canada for moving the regulatory process forward and taking this important step towards the full realization of the Healthy Eating Strategy. This policy should, however, be viewed as only one piece within a much larger and more comprehensive approach to protecting children and youth from targeted advertisements that negatively impact their food choices.

In addition to the recommendations made above, action is also needed to address exposure to advertisements in physical settings, on packaging, and through additional media sources. This policy also requires greater clarification and specificity on implementation, timelines, monitoring and evaluation, and enforcement mechanisms.

Current trends in childhood nutrition demand a multi-pronged response. While there are meaningful ways in which this proposal can be improved and expanded upon, the CPS strongly supports Health Canada's efforts to restrict the marketing of foods high in sodium, added sugar, and saturated fats to children.

About the CPS

The Canadian Paediatric Society is the national association of paediatricians, committed to working together to advance the health of children and youth by nurturing excellence in health care, advocacy, education, research, and support of its membership. Founded in 1922, the CPS is a voluntary professional association that represents more than 3,600 paediatricians, paediatric subspecialists, paediatric residents, and others who work with and care for children and youth.