



Response to the House of Commons
Standing Committee on Health
Study on Children's Health

June 1, 2022

Preamble

The pandemic imposed many hardships on families and children across Canada, catalyzing a societal rethinking of the way we live our lives. Canadian public policy leaders should use this opportunity to better children's health and establish cost-effective policies that contribute to healthy minds and bodies.

Children had most of their social and physical activities outside of the home suspended during the pandemic. Moreover, many families found themselves adopting non-nutritious eating habits that can be associated with increased chronic disease morbidity and mortality later in life.¹ We call on the federal government to help families recover from pandemic-induced strains on healthy and nutritious lifestyles and help families make better-informed healthy food choices.

Unhealthy diets in Canada

In Canada, diet-related factors are leading risk factors for death. In 2019, 36,000 deaths were attributed to unhealthy diets.² During the early pandemic stages, 35% of Canadians reported increasing their consumption of junk foods and sweets.³

Canadian diets are currently dominated by ultra-processed foods, high in salt, sugars and saturated fats.⁴ Children and youth (ages 2-18) specifically, get over half their calories from ultra-processed foods.⁵ This is problematic, as a high intake of these foods is significantly associated with the incidence of chronic diseases and conditions including, obesity, diabetes and high blood pressure, all risk factors for heart disease and stroke.⁴ Chronic diseases impacted by modifiable risk factors like diet cost our health system approximately \$26 billion annually.⁶

More can be done to make healthy food choices easy, accessible, and affordable to families in Canada. Specifically, three nutrition-related policies that are in the public's interest can be implemented to improve children's health and longevity and assist families in making healthier decisions daily.

Recommendation 1: Restrict marketing to children

Pre-pandemic, Canadian youth spent almost eight hours a day in front of screens.⁷ Since the pandemic started, screen time for children and adolescents increased significantly,⁸ as education, socialization, and recreation went online. Collectively, children (ages 2-11) see about 50 million food and beverage ads a year on their top 10 favourite websites.⁹ The food and beverage industry spend over \$1 billion a year marketing to children¹⁰, 90% of which promotes products high in salt, sugars or saturated fats. Research shows that food and beverage marketing impacts the foods children eat, their food preferences and beliefs, the foods they pester parents to buy, and rising childhood obesity rates.¹¹

In June 2021, the food and beverage industry revised their voluntary code to reduce marketing to children, however voluntary codes are not effective at truly managing the problem of marketing food and beverages high in salt, sugars, and saturated fat to kids. For example, a study showed that non-permissible Canadian food and beverage ads (according to the voluntary code) were 63% higher during peak viewing times on children's television than during off-peak viewing times.¹²

Since 1980, the province of Quebec has had legislation that prohibits commercial marketing aimed at children under the age of 13 (via Section 248 and 249 of the Quebec Consumer Protection Act).

Reviews of Quebec’s legislation found that families who watched regulated (versus non-regulated) broadcasts reported a lower propensity to consume fast food.¹³ Overall, restrictions on marketing to children are among the most cost-effective and impactful at preventing unhealthy weight gain.

Bill S-228 aimed to protect children by restricting the marketing of unhealthy food and beverages. It was passed by the House in September 2018 but died on the Senate order papers in 2019. Currently, Private Member’s Bill C-252, which we support, has similar aims. Additionally, Health Canada’s Forward Regulatory Plan for 2022-2024 includes a timeline of Fall 2023 for the development of draft regulations (Canada Gazette Part 1).

Heart & Stroke recommends the introduction of marketing to kids regulations in Canada Gazette Part 1 by Fall 2023, per Health Canada’s Forward Regulatory Plan.

Recommendation 2: Front-of-Package Nutrition Labelling

Ready-to-consume food product availability has outpaced fresh food. In fact, between 1930 and the early 2000s, the total household calorie availability of ready-to-consume foods doubled to 62%.¹⁴ Most of these foods are high in salt, sugars, and saturated fats and are generally low in protein, fibre, vitamins, and minerals. Importantly, a 10% increase in the consumption of ultra-processed food is associated with a 14% higher risk of all-cause mortality.¹⁵

Many consumers find the current nutrition facts tables (NFT) on packaged foods difficult to read and understand, and unhelpful for making healthy choices quickly.¹⁶ While some food and beverage manufacturers have taken voluntary steps to implement front-of-package (FOP) labelling, these 150+ labelling systems are confusing, inconsistent, and often serve to promote highly processed foods.¹⁷

Front-of-package labelling has proven effective as a best practice. In 2016, Chile implemented symbols to mark “high-in” pre-packaged foods that exceed specified limits, and changes in consumer purchasing decisions were found after implementation.¹⁸

In Canada, regulations would unify and simplify understanding of food consumption, thereby empowering parents (and children) to make smart purchasing decisions.

The proposed Health Canada FOP “high in” labelling with alert symbols provides better guidance than the NFT and can be easily understood by all consumers including those with lower education and health literacy levels.^{16,19}

Front-of-package labelling standards in the food and beverage sector will help parents and children become better informed as to what they are consuming – and also help to remove some of the emotional marketing pressures experienced from exposure to aggressive marketing aimed at children. Regulations should be mandatory for prepackaged foods that exceed the specified thresholds for sodium, sugars and saturated fat.

Heart & Stroke recommends the finalization of FOP nutrition labelling regulations in Canada Gazette, Part II this spring, per the recent Health Canada Forward Regulatory plan.

Recommendation 3: Implement a National School Nutrition Program

During the pandemic, one in seven Canadians reported experiencing food insecurity because of pandemic related unemployment, poverty and low-income status.²⁰ Food insecurity is an income-based issue closely tied to markers of social and economic disadvantages that continues to burden Canadians. A January 2022 poll found that almost a quarter of Canadians were buying less fruit and vegetables due to affordability challenges.²¹

Children are particularly affected by food insecurity; 33.3% of food bank users in Canada are children, while they represent only 19.1% of the population.²² Food insecurity is associated with a wide variety of chronic conditions such as increased rates of heart disease and other illnesses, including adult obesity, type 2 diabetes, hypertension and poor mental health.

In December 2021, the Ministers of Agriculture and Agri-Food and Families, and Children and Social Development mandate letters committed to develop a National School Food Policy and to work toward a national school nutritious meal program. In addition, several parties have demonstrated a commitment to secure affordable healthy food for all people in Canada.

A national school nutrition program would take financial pressure off family budgeting, help families deal with inflation and save parents time and mental stress. It would enable schools to teach food literacy, support “buying local” and help children meet the consumption recommendations of Canada’s Food Guide. The program could be executed with \$200m/year in sustainable funding.²³

A national school nutrition program should be truly universal. The federal government should consult with Indigenous organizations and communities to discuss how they would like their broad food security and school nutrition needs addressed and funded. Moreover, the UN Convention on the Rights of the Child recognizes that all children have an intrinsic right to adequate nutrition and there is more that Canada can do to help deliver that right.

Heart & Stroke recommends that the federal government move swiftly to implement its commitment to a national school nutrition program (\$1 billion/5 years).

Conclusion

Heart & Stroke is not alone in making these evidence-based policy recommendations. The Stop Marketing to Kids Coalition, the Childhood Obesity Foundation, Diabetes Canada, the Canadian Cancer Society, Food Secure Canada and the Quebec Weight Coalition support front-of-package nutrition labelling and restrictions on marketing to kids. Many also support a national school food program. Our organizations are keenly focused on improving health outcomes for children and families.

As we continue to emerge from the greatest public health challenge of our times, making the healthy choice the easiest choice should be a priority to protect children’s health.

We welcome the opportunity to speak to the committee on this study.

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