

Stop Marketing to Kids Coalition

Advocates for restricting food and beverage marketing to kids

OPEN LETTER

Right Honourable Justin Trudeau, PC, MP
Prime Minister of Canada
House of Commons
Ottawa, ON K1A 0A6
By email: pm@pm.gc.ca

May 27, 2024

Dear Prime Minister,

We are the members of the Stop Marketing to Kids Coalition, representing 10 leading Canadian health organizations with a special interest in protecting and promoting children's health, with the support of an additional 92 organizations, several international organizations, and 22 renowned health experts. Our mission is to support the development of restrictions on the marketing of foods and beverages high in salt, sugar and/or saturated fats to children in Canada.

We are driven by some alarming statistics:

- Ultra-processed food ¹ consumption in Canada is highest in children 9-13 years of age, making up nearly 60% of calories in their diets. ²
- Diets high in ultra-processed foods and/or sugary drinks are linked to an increased risk of cardiovascular disease, stroke, diabetes, cancers, tooth decay and mortality later in life. ^{3, 4, 5, 6, 7}
- In 2019 alone, dietary risk factors contributed to 36,000 deaths in Canada. ^{8, 9}
- Children in Canada are bombarded with marketing for food high in salt, sugar and/or saturated fat on a regular basis across a variety of media and settings.
- Children are uniquely vulnerable to marketing due to their still-developing brains.
- Canada is falling behind other countries that are introducing similar restrictions for children.

The Stop Marketing to Kids Coalition is a strong supporter of your government's commitment to restrict the marketing of unhealthy foods and beverages to kids. We are grateful that your government committed to addressing this issue in its 2015 and 2021 election platforms, the 2019 federal budget, and in four health minister mandate letters. Unfortunately, after almost nine years, the clock is running out to meet this commitment. In fact, if draft regulations (Canada Gazette Part 1) are not introduced by June of this year, it will be almost impossible for the regulations to be finalized before the end of this mandate, and this commitment will remain unfulfilled.

What has been clear since your government began its work on the Healthy Eating Strategy is that these nutrition measures are strongly supported by Canadians. The Food Guide was warmly embraced by the public and the media. Nutrition labeling and the National School Food program were also positively received and viewed as practical tools to help families. These actions have put Canada in line with leading countries around the world. We also know that almost 75% of people in Canada support food marketing restrictions to kids.¹⁰

We agree with your recent comments that these measures are generational investments that will support kids and their families for years to come and will help parents to make better food choices for their kids. We appreciate your dedication to press on to help children and families, especially when they are in vulnerable environments.

There has been exhaustive consultations on the issue of implementing restrictions on unhealthy food marketing aimed at children. Stakeholders were extensively engaged by the Senate Committee on Social Affairs, Science and Technology (SOCA) in 2017 and the House of Commons Committee on Health (HESA) in 2018 when Bill S-228 was being studied. More recently, Bill C-252 was studied by the HESA Committee in 2023. Furthermore, Health Canada has been consulting stakeholders on marketing to kids; holding public consultations on this topic in 2017, 2018 and 2023. Academic research analyzing information from Health Canada's openness and transparency website and the federal lobbyist's registry also show that industry stakeholders have had extensive meetings and interactions with government officials since 2015 on this topic and more so than health-related stakeholders.^{11,12}

Research in Canada and globally has repeatedly shown that industry self-regulation is not effective at protecting children from exposure to unhealthy food and beverage advertising.^{13,14,15,16,17,18,19,20,21}

Companies participating in Canada's previous self-regulatory code (2007-2019) were found, in some instances, to advertise more heavily in media intended for or preferred by children than non-participating companies and most of their advertising (>70%) promoted foods high in salt, sugar and/or saturated fats.^{22,23} Despite more than a decade of self-regulation, children in Canada continue to be targeted by food marketing. Much like the previous initiative, industry's new self-regulatory code has many gaps and will not sufficiently protect children.

We ask for your support in seeing Health Canada's marketing to kids regulations (Canada Gazette Part 1) introduced no later than June 2024. It is an important step toward fulfilling a key, longstanding government commitment to improve the health and wellbeing of children in Canada. We welcome the chance to discuss our position with you.

Sincerely,

Rita Koutsodimos, Executive Director



Andrea Seale, Chief Executive Officer



Dr. Joel Antel, President



Dr. Tom Warshawski, Chair of the Board



Corinne Voyer, Director



Russell Williams, Senior Vice President of Mission



John-Paul Cody-Cox, Chief Executive Officer



Wade Thorhaug, Co-Executive Director



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Doug Roth, Chief Executive Officer



Monique Potvin Kent, PhD, Professor



Cc: Mark Holland, Minister of Health; Patty Hajdu, Minister of Indigenous Services; Ginette Petitpas Taylor, Minister of Veteran Affairs; Katie Telford, Chief of Staff, PMO; Rick Theis, Director Policy, PMO; Dani Saad, Senior Policy Advisor, PMO; Eshan Naik, Director Policy, Office of the Minister of Health.

¹ Ultra-processed foods are formulations of ingredients, mostly of exclusive industrial use, typically created by a series of industrial techniques and processes (hence 'ultra-processed'). E.g., soft drinks, candy, sweetened breakfast cereals, prepared pizza, hot dogs.

² Moubarac JC. Ultra-Processed Foods in Canada: Consumption, Impact on Diet Quality and Policy Implications. University of Montreal; 2017. Accessed April 8, 2024. <https://www.heartandstroke.ca/-/media/pdf-files/canada/media-centre/hs-report-upp-moubarac-dec-5-2017.ashx>

³ Bonaccio M, Di Castelnuovo A, Costanzo S, et al. Ultra-processed food consumption is associated with increased risk of all-cause and cardiovascular mortality in the Moli-sani Study. *Am J Clin Nutr.* 2021;113(2):446-455. doi:10.1093/ajcn/nqaa299

⁴ Srour B, Fezeu LK, Kesse-Guyot E, et al. Ultra-processed food intake and risk of cardiovascular disease: prospective cohort study (NutriNet-Santé). *BMJ.* Published online May 29, 2019; l1451. doi:10.1136/bmj. l1451

⁵ Fiolet T, Srour B, Sellem L, et al. Consumption of ultra-processed foods and cancer risk: results from NutriNet-Santé prospective cohort. *BMJ.* Published online February 14, 2018; k322. doi:10.1136/bmj. k322

⁶ Delpino FM, Figueiredo LM, Bielemann RM., da Silva BGC, Dos Santos FS., Mintem GC, Flores TR., Arcêncio RA, & Nunes BP. Ultra-processed food and risk of type 2 diabetes: a systematic review and meta-analysis of longitudinal studies. *International journal of epidemiology*, 2022; 51(4), 1120–1141.

⁷ Valenzuela, MJ, Waterhouse B, Aggarwal VR, Bloor K, Doran T. Effect of sugar-sweetened beverages on oral health: a systematic review and meta-analysis. *Eur J Public Health.* 2021 Feb 1; 31(1), 122-129

⁸ Institute of Health Metrics and Evaluation. Global Burden of Disease Compare IHME Viz Hub. Published 20129. <http://ihmeuw.org/5eh5> (Accessed October 11, 2021)

⁹ Government of Canada, Public Works, and Government Services Canada. Canada Gazette –Regulations Amending the Food and Drugs Regulations (Nutrition Symbols, Other Labelling Provisions, Vitamin D and Hydrogenated Fats or Oils) Published June 28, 2022. Available from: <https://canadagazette.gc.ca/rp-pr/p2/2022/2022-07-20/html/sor-dors168-eng.html> (Accessed April 8, 2024)

¹⁰ Heart & Stroke public opinion poll conducted by Pollara Strategic Insights on Jan 10-11, 2023 among 1,531 Canadians (18+)

¹¹ Vandenbrink D, Pauzé E, Potvin Kent M. Strategies used by the Canadian food and beverage industry to influence food and nutrition policies. *Int J Behav Nutr Phys Act*, 2020;17(3). <https://doi.org/10.1186/s12966-019-0900-8>

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