



**MEMO / NOTE DE SERVICE**

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**TO: Board of Health for the City of Ottawa Health Unit**

**DESTINATAIRE : Conseil de santé de la circonscription sanitaire de la ville d'Ottawa**

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**DATE: September 6, 2023**

**6 septembre 2023**

**FILE NUMBER: ACS2023-OPH-HPP-0002**

**SUBJECT: Chronic Disease Prevention: Restricting Marketing of Unhealthy Food and Beverages to Children: Health Canada Consultation**

**OBJET : Prévention des maladies chroniques : Limiter la promotion d'aliments et de boissons malsains auprès des enfants : Consultation de Santé Canada**

**PURPOSE**

The purpose of this memo is to brief the Ottawa Board of Health on the status of Health Canada's policy update on restricting food advertising primarily directed at children on television and digital media, work referred to as Marketing to Kids (M2K), and provide an update on Ottawa Public Health's work in this area.

## **BACKGROUND**

Restricting food advertising to children has been part of the federal Minister of Health's mandate since 2015<sup>i</sup> and is part of Health Canada's [Healthy Eating Strategy](#) and commitment to protecting children's health. In August 2017, [OPH submitted a response](#) to Health Canada's initial consultation on their proposal for restricting marketing of unhealthy food and beverages to children (under 17 years of age). OPH generally supported the proposal and further recommended that Health Canada consider restrictions on marketing of all food and beverages and that the age limit include children and youth aged 17 and under.

Moreover, in April 2017, OPH received approval from the Board of Health for a [community consultation plan](#) (and a [revised plan](#)) for the marketing of unhealthy food and drinks to children and youth at the municipal level. The consultation took place from April to October 2017, and [the results identified opportunities](#) in the areas of policy change, education/awareness raising and increasing access to healthy food and drinks in municipal settings.

Since February 2020, OPH has had a Memorandum of Agreement with Health Canada to assess feasibility and identify actions to limit M2K, align practices with Canada's Food Guide, and support healthy eating environments in local settings. Due to the redeployment of staff to the COVID-19 emergency response, this work was put on hold except for two deliverables. The first was a scan of evidence to provide healthier food in a profitable way and recommended actions to assess feasibility and restrict marketing in recreation facilities, schools and childcare settings. The second was a feasibility study in local settings, which revealed opportunities for implementing actions to limit M2K and to support implementation of Canada's Food Guide in childcare and recreation settings<sup>ii</sup>. Upon resuming work in the area of Chronic Disease Prevention, OPH established a partnership with Children's Services (Community and Social Services Department) to support healthy eating environments in childcare settings in Ottawa. An action plan for collaborative work in 2023-2024 was developed based on common priorities and findings from the feasibility assessment. OPH continues to monitor for opportunities to improve health promoting environments in local settings.

## DISCUSSION

On April 25th, 2023, Health Canada released a [policy update](#) on restricting food advertising primarily directed at children on television and social media and solicited comments on this policy update between April 25th and June 19th. Ottawa Public Health (OPH) contributed to a response submitted by Ontario Dietitians in Public Health (ODPH).

Health Canada's policy update on restricting food advertising primarily directed at children on television and social media is expected to form the basis of a draft regulatory framework. Through its consultation, Health Canada sought comments specifically on the topics of:

- Defining advertising that is primarily directed at children.
- Targeting restrictions to advertising on television and digital media.
- Restricting advertisements for foods that contribute to excess intakes of sodium, sugars and saturated fat.

A letter with ODPH's response was sent to Prime Minister Justin Trudeau, then Minister of Health Jean-Yves Duclos, and Health Canada highlighting four considerations for the policy update to expand on and add to the topics outlined above.

1. Restricting food advertising of all foods, not just foods that are high in sodium, sugars and saturated fats.
2. Broadening the definition of children to include all children under the age of 18.
3. Expanding restrictions to include other forms of advertising beyond television and digital media.
4. Reframing this policy away from obesity prevention, which exacerbates weight bias and subsequent consequences.

Further detail on each of these considerations can be reviewed in the attached letter. OPH contributed to and supports ODPH's position on each of these considerations.

## CONCLUSION

OPH will:

- Continue to update the Board of Health on the progress of Health Canada's policy.
- Plan and implement actions to align practices with Canada's Food Guide including limiting M2K and supporting healthy food environments in local settings.

Dr./ D<sup>re</sup> Vera Etches

Medical Officer of Health/ Médecin chef en santé publique

Ottawa Public Health/ Santé publique Ottawa

## SUPPORTING DOCUMENTATION

Document 1 - Letter from ODPH: Health Canada consultation on restricting food advertising primarily directed at children on television and digital media.

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<sup>i</sup> Prime Minister of Canada Justin Trudeau (2015) Minister of Health Mandate letter [Internet]. Ottawa: Canada. Available from : <http://pm.gc.ca/eng/minister-health-mandate-letter>

<sup>ii</sup> **Ottawa Public Health.** Report for Health Canada. *The Feasibility Study to Limit Marketing of Unhealthy Foods & Beverages to Kids (M2K) in Childcare, School and Recreation Centre Settings in Ottawa.* [Online] March 30, 2021