Stop Marketing to Kids Coalition
Advocates for restricting food and beverage marketing to kids

Submission to the Standing Senate Committee on Social Affairs, Science and Technology

Study of Bill C-252, An Act to amend the Food and Drugs Act (prohibition of food and beverage marketing directed at children)

October 18, 2024

Introduction

The Stop Marketing to Kids Coalition is made up of ten Steering Committee member organizations including Heart & Stroke (co-chair), Childhood Healthy Living Foundation (co-chair), Alberta Policy Coalition for Chronic Disease Prevention, BC Alliance for Healthy Living, Canadian Cancer Society, Canadian Dental Association, Chronic Disease Prevention Alliance of Canada, Diabetes Canada, Food Secure Canada, and le Collectif Vital. The Stop Marketing to Kids Coalition is endorsed by an additional 92 organizations, several international organizations, and 22 renowned health experts. The Stop Marketing to Kids Coalition encourages policies that adequately protect children from commercial marketing to kids of food and beverages. Through cross-sector collaboration and evidence-informed policy development, our mission is to support the development of restrictions on the marketing of foods and beverages high in sugar, salt and saturated fats in Canada.

The Stop Marketing to Kids Coalition is a strong supporter of Bill C-252, a Private Member's Bill introduced by Ms. Patricia Lattanzio M.P. (Saint-Léonard - Saint-Michel) and co-sponsored by Senator Donna Dasko (Ontario). This bill would amend the Food and Drugs Act by introducing statutory restrictions for food and beverage marketing directed at persons under 13 years of age. This has been a topic of conversation for the federal government for decades. Unfortunately, a previous attempt to adopt similar legislation (Bill S-228) died on the order paper in 2019 despite having majority support in the House and Senate and being supported by 82% of people in Canada at the time[1].

Research in Canada and globally has repeatedly shown that industry self-regulation is not effective at protecting children from exposure to certain food and beverage advertising[2-14]. Companies participating in Canada's previous self-regulatory code (2007-2020) were found in some instances to advertise more heavily in media intended for[15] or preferred by children than non-participating companies and most of their advertising (>70%) promoted foods considered 'less healhty'[14]. Despite more than a decade of self-regulation, children in Canada continue to be targeted by and exposed to food marketing[16,17]. Much like the previous initiative, industry's new self-regulatory code has many gaps and will not sufficiently protect children.

Healthy eating is one of the most important things we can do for overall health, and children deserve to be protected from the persuasiveness and invasiveness of food and beverage marketing. Reducing the power and exposure of this type of marketing to children will protect children and support parents as they help their children develop healthy eating habits and food preferences.

The Stop Marketing to Kids Coalition recommends the Senate pass Bill C-252 without amendments before the end of this Parliamentary session.

Scope of the problem

Kids are eating too much highly processed food

Ultra-processed food consumption in Canada is highest in children 9-13 years of age, making up nearly 60% of calories in their diets.[18] Such highly processed or 'ultra-processed foods' undermine healthy eating.[19] Most are high in salt, sugars, and saturated fat and are generally lower in protein, fibre, vitamins, and minerals.[20]

Increased consumption of ultra-processed food is associated with a higher risk of all-cause mortality[21] and high consumption of these foods and/or sugary drinks is associated with increased risk of obesity, cardiovascular disease, stroke, diabetes, cancers and tooth decay compared to lower consumption.[22-25] In 2019 alone, dietary risk factors contributed to 36,000 deaths in Canada.[26]

With children and youth (ages 2-18) getting over half of their calories from ultra-processed foods,[18] and the clear knowledge of the harm to their health, we must act. In 2019, chronic disease impacted by modifiable risk factors like diet cost our health system approximately $28 billion a year. [27]

Food and beverage marketing affects children

It has been well-established that food marketing influences what foods children prefer, those they ask their parents for and how much they eat[28-35]. Children are uniquely vulnerable to marketing because of their level of cognitive development[36,37]. It is therefore alarming that 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.

Each year, the Canadian food and beverage industry spends $1.1 billion on marketing that may reach children.[38] This marketing appeals to children through product design, the use of cartoon or other characters, fantasy and adventure themes, humour, and other marketing techniques.[28] Clearly these techniques work as children as young as three are brand aware and are able to recognize or name food and beverage brands.[39,40]

This marketing to children means:

- Some children aged 2-11 years in Canada are exposed to more than 2,000 food ads on average on broadcast television annually, most of which promote unhealthy foods like fast food and other restaurants, snack foods, candy and chocolate and other dessert foods[41].
- Hundreds of products (n=747) sold in large grocery stores in Ontario target children with spokes characters and other child-directed content on their packaging and the vast majority (97%) are considered high in salt, sugars and saturated fat according to Health Canada's proposed nutrition criteria[42].
- Unhealthy food marketing is present in schools[43] and in publicly funded recreational centers[44] where children learn and play.
- Half of 813 food stores (53%) audited across 11 cities in Canada have very prominent product displays at their check-out that push candy, salty snacks and/or beverages on parents and children who cannot easily avoid them when shopping.[45]

- Over 50 million food and beverage ads per year are shown on children's top 10 websites,[14] and their personal identifying information is collected from websites and apps for the purpose of targeted online marketing.[46,47]
- Children in Canada are observing an estimated 1,500 advertisements annually on social media sites alone.[48]
- Most (>70%) food and beverages marketed on television and online or seen by children in these media are considered 'less healthy'[14,48] or high in salt, sugar or saturated fat. [41,49]

We need to protect children from the harmful effects of food and beverage marketing and support parents as they help their children develop healthy eating habits and food preferences.

Most people in Canada support food marketing to kids restrictions

Most people in Canada (68%) support the federal government restricting food and beverage companies from marketing unhealthy food and beverages to children under 13 years, according to a public opinion poll conducted by Pollara Strategic Insights in May 2024[50]. This is not surprising considering this poll also noted that:

- Sixty-four percent of people in Canada are concerned about the amount of food and beverage advertising directed at children. [50]
- Seventy-six percent believe that it is hard for parents to control and monitor the advertising their children see. [50]
- Fifty-eight percent agree that the food and beverage industry has an unfair advantage over parents as it is more likely to influence children's eating and drinking habits. [50]

The failure of self-regulation

Industry self-regulation has failed to protect kids from unhealthy food and beverage marketing.

Research from the United States, Australia, New Zealand, and several European countries overwhelmingly demonstrate that self-regulatory policies are failing to protect children from exposure to unhealthy food and beverage advertising[2-10]. Canada's experience with industry self-regulation is no exception[10-14]. Companies participating in the Canadian Children's Food and Beverage Advertising Initiative (CAI), Canada's former self-regulatory code (2007-2020), were found in some instances to advertise more heavily in media intended for[15] or preferred by children than non-participating companies and most of their advertising (>70%) promoted foods classified as 'less healhty'[14]. Despite more than a decade of self-regulation, children in Canada continue to be targeted by- and exposed to- unhealthy food and beverage marketing across media and settings as highlighted above[16, 17].

The failure of the CAI and self-regulatory schemes in other countries has been attributed to their lax nutrition criteria and their extremely limited scope[3,5-14]. Canada's newest self-regulatory code[51,52] implemented in June 2023 is more of the same. Its nutrition criteria defining what products can be advertised to children are more lenient than criteria proposed by Health Canada. For instance, their unique nutrition criteria for breakfast cereal[51] would allow certain sugary breakfast cereals to be advertised directly to children. The scope of this new code is also limited. For instance, as the code is written, it is unclear whether the placement of advertisements in media specifically intended for children is in of itself considered 'child directed'. As such, it is possible that the placement of unhealthy food advertising in children's media may be permitted if other criteria are met. The code also does not apply to a host of

marketing techniques that influence children as well as media channels and settings where children are exposed. Notable exclusions include but are not limited to:

- Product packaging
- Point-of sale marketing (e.g. product displays)
- Social media, websites, apps, and other digital media popular with children but not specifically intended for them
- Websites with age-verification
- The use of cartoon and promotional characters (e.g. Toucan Sam, Tony the Tiger)
- Premiums (e.g. toys offered with purchases)
- Branded educational materials and fundraising in schools
- Recreational centres

As the industry code is not legally binding, food companies are not obliged to follow it. Furthermore, adherence to the code is not actively monitored and there are no penalties for non-compliance[53].

The Solution: Statutory Restrictions

Statutory restrictions are needed to protect children.

Given the consistent failure of self-regulation, it has been established that statutory restrictions are needed to protect children as highlighted in best practice guidelines published by the World Health Organization in 2023[54]. Experience in Canada and abroad have demonstrated that the statutory regulation of food marketing can have a positive impact. In Quebec, commercial advertising directed to children under 13 years has been restricted since the 1980s[55]. Research suggests Quebec's law is associated with less direct targeting of children by unhealthy food and beverage advertising on television. For instance, the frequency of food advertising is lower on children's television stations in Quebec compared to Ontario and children aged 2-11 years in Quebec see fewer food ads featuring child-directed content than their Ontarian counterparts[56-57]. Quebec's law has also been linked with 13% reduction in the likelihood of purchasing fast food[58]. Though we can't link Quebec's advertising restrictions to changes in children's diet, it is noteworthy that kids in Quebec have previously been documented as having the highest intake of fruit and vegetables in Canada[59].

Internationally, many countries such as the United Kingdom, Portugal, Norway and Mexico have adopted statutory measures to protect children from unhealthy food marketing[60]. In 2016, Chile led the way by implementing the most comprehensive restrictions on food marketing to date alongside other nutrition policies including front-of-package labelling and a ban on selling and providing unhealthy foods in childcare settings and schools.[61] Following the adoption of these measures, studies showed a decrease in child-directed marketing techniques on product packaging (e.g. cartoon spokes characters) and a reduction in children's exposure to food advertising high in calories, salt, sugar and/or saturated fat[62-64]. Food manufacturers also reformulated their products and the purchasing of calories, sugar, sodium, saturated fats and sugary drinks per capita decreased[65-68]. Product reformulation and changes in purchasing were likely the result of Chile's multiple nutrition policies. By adopting marketing to kids regulations, Canada would join the ranks of countries like Chile who are world leaders in this area for adopting comprehensive multi-pronged policies to improve children's dietary behaviors and health.

Marketing to kids has been studied extensively – it's time to act.

The issue of marketing foods and beverages high in salt, sugar and/or saturated fats to children in Canada has been studied and consulted upon extensively by the federal government. Stakeholders were consulted heavily on food marketing to kids by the Senate Committee on Social Affairs, Science and Technology (SOCI) 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[69,70].

Policy recommendation

The Stop Marketing to Kids Coalition recommends the Senate pass Bill C-252 without amendments as soon as possible.

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