

Bill C-252: Protecting Children from Marketing of Unhealthy Food and Drink

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

October 2024

Introduction

UNICEF Canada welcomes the opportunity to provide this submission to the Standing Senate Committee on Social Affairs, Science and Technology concerning Bill C-252 (Marketing to Children). We support the passage of this Bill and trust the present submission provides useful evidence to the Committee in their deliberations.

Children's food environments combine with poverty and inequality to undermine children's nutrition and health in Canada. The food environment includes how food and drink are marketed, which has a strong influence on children's diets. Unhealthy food and beverage marketing is pervasive and persuasive. It is ubiquitous in children's daily lives, reaching children of all ages through a wide range of content, media and settings. The food and beverage marketing landscape is dominated by promotions for unhealthy products that increase children's preference for and consumption of unhealthy products and damage children's health. Marketing to children violates children's rights to nutrition and health, protection and freedom from exploitation.

Restrictions on the marketing of unhealthy food and drink have been proven to protect children from exposure and harm in Quebec and in other jurisdictions around the world. The Government of Canada can uphold its duty to protect children from exploitative marketing with a children's rights-based approach to legislation and regulation:

1. Pass into law Bill C-252, and reform the *Food and Drug Regulations* and any other relevant laws, regulations and policies (including the National Food Policy) to protect children under age 18 from marketing, consistent with the Convention on the Rights of the Child and with World Health Assembly and WHO recommendations.
2. Consider amendments to Bill C-252 to further strengthen the impact on children's rights and health, including: specific objectives to fulfil children's rights; a comprehensive definition of marketing; where and when advertising is restricted; how advertising is restricted; what product categories and characteristics are encompassed; how children's privacy and personal information must be protected; and mechanisms for complaints, enforcement and monitoring.
3. Apply Child Rights Impact Assessment (CRIA) to Bill C-252 and future legislative and regulatory developments to prioritize children's rights and interests and engage their views.
4. Implement the International Code of Marketing of Breastmilk Substitutes, relevant World Health Assembly resolutions, and recommendations in the 2016 WHO *Guidance on ending inappropriate promotion of foods for infants and young children*, to support a comprehensive approach that protects children across their life course.
5. Give children better options. Continue to invest to ensure that every child has access to nutritious food and drink in school. The passage of Bill C-252 will help ensure school environments that are free from food and beverage marketing.

Unhealthy Diets and Unhealthy Children in Canada

Unhealthy diets, overweight and obesity are prevalent among children in Canada, reflecting a food system that promotes and provides abundant unhealthy food and drink together with inadequate policies to prioritize and protect children's nutrition, health and development.¹ Canadian children have diets high in sodium, sugars and saturated fat and dental decay is a widespread concern. Canada ranked 37th out of 41 countries for the provision of adequate nutrition in a 2017 UNICEF Report Card based on children's access to sufficient healthy food and the rate of obesity.² Since then, the rate of obesity among children has persisted while food insecurity has risen to a new height. In UNICEF Report Card 18 (2023), Canada ranked 33rd of 43 countries for the rate of overweight children (an indicator of poor diets) at 31%. A record 30% of children (more than 2 million) were food-insecure in 2022.

Food costs; the nutritional profile of foods available at home, at school, in stores and in restaurants; and food advertising are interrelated and have a major impact on food choices, making healthy eating a challenge for many families and children.³ Nutritious choices are not typically what is the most available, affordable, convenient and widely promoted; therefore, the bulk of children's diets in Canada is ultraprocessed food. Consistent evidence from around the world shows that the majority of food and beverages advertised, across all media and settings, are considered to be unhealthy foods. In evidence gathered over the past 20 years, marketing of ultra-processed and nutrient-poor food and drink has been identified as a factor that contributes to poor nutrition, overweight and obesity.⁴

Food and beverage marketing, promoting items high in salt, sugars and saturated fat, plays a critical role in childhood obesity and can impact heart health in adolescents as well as breathing difficulties, increased risk of broken bones, high blood pressure, early markers of heart disease and insulin resistance. Constant exposure to unhealthy food and drink marketing early in life also affects lifelong preferences and consumption patterns, putting children at a higher risk of developing chronic health problems including an increased risk of cardiovascular disease, diabetes, stroke, cancers, disability and mortality in later life. On the other hand, international evaluations of food marketing laws show that when children's exposure to food marketing is reduced, there is a corresponding reduction in the purchasing of unhealthy foods at the population level.⁵

Food Marketing is Pervasive in Canada and Harmful to Children

¹ World Health Organization: WHO. (2021, June 9). *Obesity and overweight*. <https://www.who.int/news-room/fact-sheets/detail/obesity-and-overweight>

² UNICEF REPORT CARD 14: *Child Well-being in a Sustainable World*. (2017). UNICEF Canada: For Every Child. <https://www.unicef.ca/en/unicef-report-card-14-child-well-being-sustainable-world>

³ UNICEF Policy Brief: *Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children* (2021)

⁴ Government of Canada, Statistics Canada. (2020, November 18). *The Daily — Almost half of Canadians' daily calories come from ultra-processed foods*. <https://www150.statcan.gc.ca/n1/daily-quotidien/201118/dq201118g-eng.htm>

⁵ UNICEF Policy Brief: *Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children* (2021); Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

Food marketing is pervasive and persuasive in Canada. It fosters three markets by advertising to children: (1) the primary market, as consumers in their own right, with their own money to spend (particularly as they get older); (2) the parental market, as children have a major influence on what their parents buy, often referred to as ‘pester power’, the ‘nag factor’ or ‘kidfluence’; and (3) the future market, as children are likely to stick to the consumption habits they acquired as children throughout their lives. The ‘commodification of childhood’ through marketing is all the more problematic when marketing promotes unhealthy food and drink.⁶

The Canadian Heart and Stroke Foundation has noted that every year, the Canadian food and beverage industry spends around \$1 billion on marketing to children. Most food and beverage products promoted to children are unhealthy (high sodium, sugars and saturated fat). Marketing reaches children where they live, learn, eat, play and meet – both online and in the physical environment. Health Canada [data](#) finds that television continues to be a major source of exposure to food and drink advertising. The average child viewed close to 2,000 food and beverage ads on television in 2019 -- about five ads per day. Television exposure for Canadian children (ages 2 to 11) predominantly features advertisements for fast food (43%), candy and chocolate (12%), sit-down restaurants (8.8%) and soft drinks (5%).⁷ However, children are increasingly exposed to marketing through other channels including street/billboard; retail; in-school marketing; product placement in media, sports sponsorship, games and other settings.

77% of U-Reporters in Canada (ages 13-24) agree that they see a lot of advertisements for unhealthy food and drinks in stores (2023 poll).⁸

In recent years, digital marketing has become an integral component of the marketing mix for food and drink brands: it has not replaced traditional settings for food marketing but has been added to increase brand presence across a larger, more diverse range of media. Online food and beverage marketing includes advertising through digital games; on websites popular among children; on branded websites and apps and through mobile devices and social media websites. Social networking sites enable companies to encourage children to ‘like’, reference and promote their brands, co-opting children as brand ambassadors.⁹

38% of U-Reporters in Canada (ages 13-24) said they see online advertisements for unhealthy food and drinks a few times a day (2023 poll).¹⁰

Unhealthy food and drink marketing has a powerful influence over children. Children are highly vulnerable due to their developmental stage and the marketing tactics to which they are exposed. Food and drink marketing is designed to appeal to children through product design; the use of cartoon or other characters; fantasy and adventure themes; humour; placement and other marketing techniques (particularly outside Quebec where fewer restrictions are in place). Studies have found that children as young as three years of age can recognize or name food and beverage brands; children under the age of five are unable to consistently distinguish between advertising and programming; most children do not understand the selling purpose of advertising until they reach

⁶ UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)

⁷ Pausé, E., & Kent, M. P. (2021). Children’s measured exposure to food and beverage advertising on television in Toronto (Canada), May 2011–May 2019. *Canadian Journal of Public Health*, 112(6), 1008–1019. <https://doi.org/10.17269/s41997-021-00528-1>

⁸ <https://canada-en.ureport.in/>

⁹ UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)

¹⁰ <https://canada-en.ureport.in/>

around eight years old; and by the age of 12, most children understand that ads are designed to sell products but are not yet aware of the persuasive intent of the advertisement.¹¹

Regulation of advertising has tended to protect younger children, typically under age 12 or 13, assuming that older children have the cognitive capacity to protect themselves from adverse advertising influence.¹² For instance, Quebec, Sweden and Norway prohibit marketing to pre-adolescent children. However, there are significant challenges associated with limited definitions of ‘a child’ in regulatory responses based on assumptions about older children’s media literacy in the face of persuasive marketing. Children tend to become more aware of the selling intent of advertising as they get older, but many children under age 18 struggle to understand that sophisticated advertisements are biased and trying to sell them something. They are still developing the emotional and mental tools necessary to resist the intent of product marketing to which even adults are susceptible. An increasing number of studies, using neuroscience and behavioural psychology, have called into question whether teenagers have the cognitive capacities to identify or protect themselves from the persuasive intent of advertising.¹³ The area of the brain that prompts inhibitory control is less developed in children and adolescents than in adults. Adolescents’ brains are biased towards rewards, and they are more likely than adults to respond to marketing. They are also more likely than younger children to have the money and opportunity to purchase unhealthy products. Both younger and older children are exposed to large volumes of unhealthy food marketing. Evidence shows that unhealthy food and drink marketing is highly persuasive and powerful for children of all ages, unfairly influencing food and drink preferences, with negative consequences for their diets and health. Food regulation in Ireland, South Korea and the UK is based on a definition of children as persons aged up to 18 years.¹⁴

52% of U-Reporters in Canada (ages 13-24) agree that “advertisements for unhealthy food and drinks tempt me to buy unhealthy products” (2023 poll).¹⁵

The more children are exposed to food and drink advertising, the more likely they are to request or consume advertised products. Constant pressure from industry competes with parents’ and educators’ efforts to promote healthy eating.¹⁶

A Children’s Rights Approach to Marketing Policy and Regulation

Governments have the duty to act in the best interests of children, which includes a duty to protect their rights and prevent harms associated with the marketing of unhealthy food and drink to children.¹⁷

¹¹ UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)

¹² Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

¹³ UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)

¹⁴ Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

¹⁵ <https://canada-en.ureport.in/>

¹⁶ UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)

¹⁷ *Shifting the Narrative: A playbook for effective advocacy on the prevention of childhood overweight and obesity* | UN Nutrition: The United Nations interagency coordination mechanism for nutrition. (n.d.). <https://www.unnutrition.org/library/publication/shifting-narrative-playbook-effective-advocacy-prevention-childhood-overweight>

By unfairly targeting and manipulating children at a stage of cognitive development when it is exploitative and highly influential, marketing impairs their right to access information that supports their healthy development and their right to be protected from exploitation. This in turn undermines their rights to optimal nutrition, health and development. The most negatively affected rights in the Convention on the Rights of the Child include health (article 24), adequate and nutritious food (articles 24 and 27), privacy (article 16), freedom from exploitation (article 2) and a sustainable planet.¹⁸ Additionally, rights to education, leisure, play and participation in cultural life may be compromised. The impacts are inequitable and discriminatory, since children facing systemic barriers tend to have greater exposure to marketing and less access to healthy and affordable food systems.¹⁹

As rights-holders, children are entitled to legal protection of their rights and governments are obligated to prioritize, uphold, safeguard and fulfill their rights.²⁰ The Committee on the Rights of the Child in General Comment 25 (2021) provides guidance on children’s rights in relation to the digital environment: “States Parties should...regulate targeted or age-inappropriate advertising, marketing and other relevant digital services to prevent children’s exposure to the promotion of unhealthy products, including certain food and beverages”.²¹ This call is echoed by the United Nations Special Rapporteurs on the Right to Health and on the Right to Food²² which have urged governments to “impose strong regulatory systems to ensure that the food industry does not violate citizens’ human rights to adequate food and nutrition”.

International resolutions and frameworks on the prevention of overweight, obesity and noncommunicable diseases support the implementation of restrictions on the marketing of unhealthy foods to children. In 2010, the World Health Assembly (WHA), of which Canada is a Member State, endorsed the WHO *Set of Recommendations on the marketing of foods and non-alcoholic beverages to children*. This was followed by the 2012 framework implementation report which called for States to develop policies to protect children from the marketing of unhealthy food and drink. As noted in the recommendations, governments are in the best position to set direction and overall strategy to achieve population-wide public health goals and should therefore set the scope of a country’s marketing restrictions. However, in 2016 the WHO Commission on Ending Childhood Obesity highlighted the failure of Member States to seriously implement the recommendations.

Canada has committed to acting in the best interest of children and ensuring they are a priority in policy and regulatory decisions by ratifying the United Nations Convention on the Rights of the Child. It has pledged to achieve the Sustainable Development Goal targets by 2030, which include ensuring adequate nutrition, and adopted WHA resolutions. Protecting children from exploitative marketing of unhealthy food and drink is an important means to deliver on Canada’s obligations to children.

¹⁸ Public Health Agency of Canada. (2021, November 5). *The United Nations Convention on the Rights of the Child: An Overview for Children and Teenagers*. Canada.ca. <https://www.canada.ca/en/public-health/services/national-child-day/united-nations-convention-rights-of-the-child.html>

¹⁹ Safety, N. a. F. (2023, July 7). *Taking action to protect children from the harmful impact of food marketing: a child rights-based approach*. <https://www.who.int/publications/i/item/9789240047518>

²⁰ *Taking Action to Protect Children from the Harmful Impact of Food Marketing* (UNICEF, 2023) <https://www.unicef.org/documents/nutrition/food-marketing-toolkit>

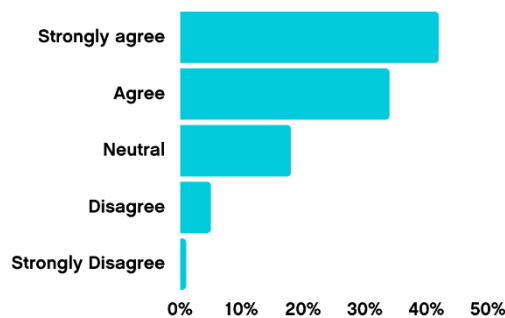
²¹ *Taking Action to Protect Children from the Harmful Impact of Food Marketing* (UNICEF, 2023) <https://www.unicef.org/documents/nutrition/food-marketing-toolkit>

²² Ibid

Protecting Children and Supporting Health and Nutrition Through Regulation

Independent evaluations assessing the effectiveness of marketing restrictions on unhealthy food and drink in different jurisdictions have shown that government-led mandatory approaches, free from conflicts of interest, are effective at reducing the power and exposure of unhealthy food marketing.²³ They have more favourable impacts than industry self-regulatory and voluntary approaches.²⁴ If properly implemented, marketing regulation can be a low-cost, high-impact intervention that facilitates childhood nutrition. Government-led restrictions have worked in jurisdictions such as Quebec and Chile to reduce children’s exposure to marketing, and it is notable that Quebec has the lowest rate of childhood obesity among Canada’s provinces and territories. Self-regulatory schemes in Canada and in other jurisdictions have failed to protect children from exposure to unhealthy food and drink advertising.²⁵

“The government should restrict advertisements of unhealthy food and drinks specifically aimed at children and youth.”



Report CANADA VOICE MATTERS

August 2023
170 Respondents

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Restricting food advertising to children has been a mandate of the federal Minister of Health since 2015. As part of its multi-faceted [Healthy Eating Strategy](#) announced in 2016, the federal government indicated its intent to limit the ability of the food and beverage industry to advertise unhealthy food and drink to children, in a similar approach to Quebec’s ban on advertising to children that has been in effect for decades.²⁷ Three of the strategy’s four pillars have been achieved; protecting children from marketing is outstanding. The 2019 federal Budget, 2021 Liberal election platform and the Minister of Health’s December 2021 Mandate Letter included a commitment to advance the Healthy Eating Strategy, including restrictions on food advertising to children. In May, 2024, the House of Commons Standing Committee on Health (HESA) released a report on child health recommending

²³ A Child Rights Based Approach to Food Marketing: A Guide for Policymakers (UNICEF, 2018)

²⁴ Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

²⁵ *Designing legislative responses to restrict children’s exposure to unhealthy food and non-alcoholic beverage marketing: a case study analysis of Chile, Canada and the United Kingdom* | *Globalization and Health*. (2022.). <https://rdcu.be/dyEgq>

²⁶ <https://canada-en.ureport.in/>

²⁷ Health Canada. (2016, October 24). *Healthy eating strategy*. Canada.ca. <https://www.canada.ca/en/health-canada/services/publications/food-nutrition/healthy-eating-strategy.html>

that the Government of Canada “implement restrictions on the marketing of unhealthy food to children.”²⁸

Health Canada intends to amend the *Food and Drug Regulations* to restrict advertising to children of foods that contribute to excess intakes of sodium, sugars and saturated fat. In April 2023, [Health Canada](#) published a policy update outlining its proposed “first step” approach to regulating food advertising to children on television and digital media.²⁹ This approach prioritizes media where children spend much of their time and where they are highly exposed to food advertising, including ads that air during a children's television program or on a children's website. It excludes children's exposure to unhealthy food and drink advertising at point of sale, food packaging and labelling and other marketing tactics. The update does not propose to protect all children under age 18 nor limit the broader exploitation of children through marketing.

A limited focus for regulatory ambition would lay a basic foundation to protect children from food and beverage marketing. But experience shows that, although partial restrictions may be perceived as a basis for cumulative gains over time, they leave many children inadequately protected and may actually have counterproductive effects. For example, partial restrictions have been shown to lead to an increase rather than a decrease in children's exposure to food marketing in some instances.³⁰ Narrow policy criteria allow gaps that encourage companies to shift their marketing investment to those areas that are not covered (e.g., types of broadcast media, types of settings and types of tactics) and to older children who are left unprotected. The WHO recommendations note that a comprehensive approach to unhealthy food and drink marketing “has the highest potential to achieve the desired impact”. What has been learnt from regulating tobacco is that a gradual approach is less effective to protect children than a comprehensive approach because it allows gaps in the regulatory framework that can be exploited.

To protect children's rights, Canada needs comprehensive federal legislation and regulations that restrict all forms of unhealthy food and drink marketing, to all children, in all relevant media and in the primary settings where children live and play. The WHO recommendations urge governments to legislate two components of marketing: (1) ‘exposure’, or the reach and frequency of the marketing message; and (2) ‘power’, the creative content, design and execution of the message.

Regulation should specify:

- Who are children
- What is food marketing
- What types of marketing should be restricted and in what circumstances (settings, times, media and content)
- Which media will be covered
- What foods are to be restricted from marketing
- The objectives of the restrictions

²⁸ House of Commons Standing Committee on Health. (May 2024). *Fostering Healthy Childhoods: A Foundation for Resilient Generations*. [Committee Report No. 18 - HESA \(44-1\) - House of Commons of Canada \(ourcommons.ca\)](#)

²⁹ <https://www.canada.ca/en/health-canada/services/food-nutrition/healthy-eating-strategy/policy-update-restricting-food-advertising-primarily-directed-children.html>

³⁰ Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

- How will they be enforced and monitored (free from conflicts of interest; appropriately resourced; legal duties of compliance; and a range of deterrents and penalties)
- Broad powers and resources for an independent authority to address implementation
- A time-bound implementation schedule
- Evaluation time frames

Reducing the prevalence of childhood overweight should not be the only stated **policy objective** – doing so opens the doors for industry challenge as it is difficult and takes longer to measure how food marketing policies impact children’s weight at the population level. Protecting and fulfilling the rights to which children are entitled should be a key objective. Commercial rights such as the right to free trade are not absolute; they can be restricted on grounds of public interest, including public health and children’s best interests. Specific objectives should include:

- Acknowledging the priority afforded to children’s best interests and the optimal and equitable fulfilment of their rights
- Restricting commercial practices that exploit children’s specific vulnerabilities and evolving capacities

In Ireland, the legislative objectives are more child rights-based than the narrow focus on health or healthy weight in most jurisdictions:

- To offer protection for children from inappropriate and/or harmful commercial communications
- To acknowledge the special susceptibilities of children and ensure that commercial communications do not exploit these susceptibilities
- To ensure that commercial communications are fair and present the product or service promoted in a way that is easily interpreted by children and does not raise unrealistic expectations of the capabilities or characteristics of the product or service being promoted

Marketing restrictions should protect **children of all ages** from exposure to unhealthy food and beverage marketing. Children should be protected up to the age of 18 years, as per the definition of a child in the Convention on the Rights of the Child. There is good evidence to justify this age range, and legal precedence for broad restrictions on the marketing of other products to ensure protections from harm: general prohibitions on advertising, promotion or sponsorships for tobacco products, alcohol and breast-milk substitutes are two examples.

Marketing restrictions should include a **comprehensive definition of marketing**, across all settings and media to which children are exposed, regardless of the intended audience. A broad definition of marketing to children would explicitly include the WHO conditionalities: “any form of direct or indirect commercial communication or message that is designed to, or has the effect of, increasing the recognition, appeal, and/ or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service.” For children this encompasses marketing techniques (including advertising, direct marketing, product placement and timing, branding, design and packaging, cartoon characters, promotions and deals, gifts, toys, prizes and digital geo-tracking); communication media (including television, social media, billboards, movies and websites); and settings (including point of sale, childcare facilities, schools and school grounds, playgrounds, family and child health services, and during any children’s sporting and cultural activities).

Legislation and regulation should include **settings-based, time-based, medium-based** and **content-based** restrictions. The WHO recommendations specifically request governments to define **settings** where children gather and ensure that they are free from all forms of unhealthy food and drink marketing. This includes settings specifically catering to children (e.g., schools) and settings that are mixed with a large number of both children and adults, such as public places, events and retail environments.

Time-based restrictions on marketing may be considered for television, radio and cinema because restrictions that rely on measuring the percentage of children in the audience or definitions of child programming are unlikely to include content when the highest numbers of children are watching or listening. When time of day is neither a determining factor in what content is consumed nor a proxy for establishing who is likely to consume it, restrictions may need to apply to all unhealthy food and beverage marketing communications on these channels.³¹

Content-based regulations ban unhealthy food marketing where the creative content of the marketing message is considered to be ‘directed to children’. This should be a default for all marketing restrictions.

The UK is one of the first jurisdictions to introduce legislation to regulate unhealthy food marketing online with the Health and Care Bill. Due to be implemented in 2024, it will include a ban on all online advertising of foods that are high in salt, sugar and/or fat. The EU has taken legislative steps to ban the use of children’s personal data for commercial purposes related to profiling and behaviourally targeted advertising, which aligns with the Committee on the Rights of the Child General Comment No.25: children’s personal information or location should not be used to target potentially harmful, commercially-driven content.

Regulation should be informed by the best available **evidence and expert opinion free from conflicts of interest** and by **consultations with young people**. Similar to the WHO Code of Marketing of Breastmilk Substitutes, conflict of interest parameters should be enacted during the process of formulating regulations: stakeholders should be engaged in consultation, but industry should not be invited to co-design or be part of decision-making processes. Health Canada has recognized that safeguarding against possible conflicts of interest in nutrition policies and programs is key to maintaining public trust in healthy eating initiatives. A similar protocol should be followed by other departments engaged in regulatory development.

Some governments, such as in Brazil, Quebec (Canada) and Norway, have gone beyond restricting only unhealthy food and drink marketing and **protect children from broader commercial exploitation** through prohibition of specific forms of marketing directed at them. These policies cover products and industries such as toys, clothing, technology, sports equipment and entertainment.

To ensure that children’s best interests are adequately considered, proposed legislation and regulations should be subject to an ex-ante **Child Rights Impact Assessment (CRIA)**. The federal Department of Justice CRIA process would support comprehensively considering and balancing

³¹ Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (UNICEF, 2023)

potential impacts on diverse children and ensuring that the best interests of the child are a primary consideration. A CRIA is also necessary to ensure that the principles of indivisibility, universality, participation and accountability are taken into account in the process of enacting food and drink marketing restrictions.

In countries that have introduced restrictions on food and drink marketing that specifically protect children, a consistent outcome is that their exposure to advertising and their consumption of unhealthy food and drink has fallen substantially. Legislation is a key lever that has worked to protect children in Canada from tobacco exposure, injury (e.g., through seat belt use) and other health risks. In addressing unhealthy food and drink marketing, it is time to put children's best interests first.

Select UNICEF Resources

- Taking Action to Protect Children from the Harmful Impact of Food Marketing: A Child Rights-Based Approach (2023)
- Minimum standards and guidelines on actions to protect children from the harmful impact of marketing of food and non-alcoholic beverages in the ASEAN region: Jakarta, ASEAN Secretariat (2023)
- Shifting the Narrative: A Playbook for Effective Advocacy on the Prevention of Childhood Overweight and Obesity (2022)
- UNICEF Policy Brief: Marketing of Unhealthy Foods and Non-Alcoholic Beverages to Children (2021)
- A Child Rights Based Approach to Food Marketing: A Guide for Policymakers (2018)
- Advertising and Marketing to Children: Global Report (November 2016)

About UNICEF Canada

UNICEF is the world's farthest-reaching humanitarian organization for children. With a presence in more than 190 countries and territories, we work tirelessly in the world's most complex situations to bring life-saving aid and long-term support to children and their families. From our role as the world's largest provider of vaccines, to supporting child health, nutrition and education, we are determined to create a better world for every child. And we won't give up.

UNICEF Canada works to address and advance children's rights in Canada and around the world. Our life-saving work for every child is funded entirely through voluntary donations. Visit unicef.ca and follow us on Facebook, X/Twitter and Instagram to learn more.

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