Submission to Senate Standing Committee on Social Affairs, Science and Technology regarding Bill S-228, An Act to amend the Food and Drugs Act (prohibiting food and beverage marketing directed at children)

Introduction

The Canadian Cancer Society is Canada’s largest national health charity. We are dedicated to finding new and better ways to protect the health of Canadians, shrink cancer rates and reduce cancer’s toll on our country.

As Canada’s leading cause of death, cancer is the very definition of a nationwide health issue. About 2 in 5 Canadians will develop cancer in their lifetime, and about 1 in 4 Canadians will die of the disease.¹ Cancer cases are projected to climb by almost 40% by 2030.

These statistics speak for themselves. More than ever governments – at all levels – need to take action to prevent cancer before it starts. We know that about one-third of all cancers can be prevented by eating well, being active and maintaining a healthy body weight.² Besides not smoking, having a healthy body weight is one the best things Canadians can do to prevent cancer.

Obesity increases the risk of at least 11 different cancers including colorectal, breast, esophageal and uterine. We need to act to put Canada on the path to better health. Since 1980, the number of adults with obesity in Canada has doubled, while the number of children with obesity has tripled.³ From a cancer risk perspective, this is concerning because if children who are obese remain obese as adults, they are at increased risk for many chronic diseases, including cancer.

Bill S-228: CCS key recommendations

The Canadian Cancer Society is a proud supporting partner on the Stop Marketing to Kids Coalition and one of over 60 endorsers of the Ottawa Principles.⁴ The Ottawa Principles call for the restriction of commercial marketing of all food and beverages to children and youth age 16 and under with the exception of non-commercial marketing for public education. Food and beverage marketing greatly influences children’s food preferences. We need to create environments that make the healthy choices, the easy choices. Health groups are not the only ones demanding action on this matter. A recent public opinion polling showed there is broad public support for restrictions on marketing to kids. For example, 70% of respondents felt that children are exposed to too much advertising by the food and beverage industry, while 78% believed that it is hard to monitor and control the advertising that is directed to

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³ PHAC/CIHI. (2011). Obesity in Canada: A joint report from the Public Health Agency of Canada and the Canadian Institute for Health Information. Ottawa, ON.
children. By taking strong legislative action on this, Parliament would be responding to the preoccupations of Canadians.

Along with other members of the Stop Marketing to Kids coalition, we applaud Senator Nancy Greene Rain for introducing legislation prohibiting food and beverage marketing to children. This bill is especially important because voluntary measures have been proven insufficient. For the past 10 years industry has set its own standards and self-regulated its marketing, and this has failed. Recent Canadian research has shown that children’s exposure to food and beverage advertising has actually increased. Legislation that requires mandatory restrictions on marketing to kids is critical. Legislation will protect kids, support parents and ensure all companies have to play by the same rules.

The Canadian Cancer Society supports Bill S-228 in its current form, but we believe there is opportunity to make it stronger. CCS would also like to share with the Committee its position around two points of debate that have emerged around this bill.

1. **CCS believes there is an opportunity to strengthen this legislation by raising the age to 16 and under.** This will protect our most vulnerable populations. Though children over age 12 are generally able to distinguish advertising and understand that it is intended to sell them something or otherwise change their behaviour, there is increasing evidence that older children and teens are vulnerable to food and beverage marketing. While young adolescents express high levels of skepticism about advertising, they consume more of it and remember more of it than younger children. Teens can critique advertisements when they are prompted to do so, but on their own are likely to believe advertising and accept misleading claims. Newer forms of marketing, such as digital and social media marketing and product placements in entertainment, and their influence are even more difficult to recognize than older methods; even adults cannot always identify them.

2. **CCS believes the bill should keep the current scope to impose restrictions on all food and beverages as it is the most robust and cost-effective approach.** However, if a change is made from restrictions on “all food/beverages” to a focus on solely “unhealthy food/beverages” then it is critical that there is commitment to the development and adoption of a robust nutrient profiling system based on public health best practices and informed by public health experts. 90% of food and beverage products marketed to kids and teens on TV and online are high in salt, fat or sugar.

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3. **CCS supports a large definition of marketing mediums to ensure it includes all the different strategies currently used to target children.** If a change removes specifics related to the types of marketing mediums that should be restricted then it is critical that there is a commitment to restrictions on a broad array of marketing mediums. This broad commitment must apply to all aspects of commercial marketing (promotion, placement, price and product) and allow for the potential inclusion of mediums such as product packaging and digital spaces.

The promotion and adoption of policies that create a supportive healthier environment where we live, work and play is an approach that we at the Canadian Cancer Society support. Legislation means a fair fight for everyone: kids, parents and the food industry. We envision a Canada where children and parents make nutritious food choices in an environment free of influence from food and beverage marketing to children.

The causes of obesity are complex and encompass social, economic, physiological, environmental and political factors. Tackling obesity requires a comprehensive approach as no one policy option will solve the increasing incidence in Canada. Strong mandatory restrictions on marketing to kids is not a magic bullet to solve childhood obesity, but it is one of the most effective weapons in a comprehensive strategy.