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Health Promotion Ontario

Ontario Association of Public  
Health Dentistry

Charitable Registration  
Number 11924 8771 RR0001

May 11, 2015

Child Care Modernization  
c/o Early Years Division  
Ministry of Education  
900 Bay Street, 24th Floor, Mowat Block  
Toronto ON M7A 1L2

By email: [CCGE\\_modernization@ontario.ca](mailto:CCGE_modernization@ontario.ca)

**Re: Regulatory Registry Posting related to the Child Care and Early Years Act, 2014**

The Ontario Public Health Association (OPHA) values the opportunity to provide comments and work with the Ministry of Education on the implementation of the new Child Care and Early Years Act, 2014 and its regulations.

The OPHA recognizes the important role played by child care providers in influencing the health and wellness of children in their early years. This can range from providing access to healthy food, creating supportive environments, positive role modelling and providing opportunities for children to develop health promoting behaviours (healthy eating and physical activity) that they will carry with them throughout their lives.

As outlined in our recommendations in Appendix A, OPHA is calling for updated and evidence-based regulations and standards for promoting and supporting healthy eating and physical activity in child care settings. Such changes will strengthen and improve health and learning outcomes, including healthy weights and reduced illness and chronic conditions, which will lead to healthy children and healthy citizens in the future. In addition, the inclusion of food literacy and physical literacy are critical components that need to be reflected in the new regulations.

OPHA recommends that regulations pertain to healthy eating and physical activity be dealt with promptly. The current regulations set in 1990, for example, refer to Canada's Food Guide which has been updated twice, in 1992 and 2007, since these regulations were put in place. Guidelines for physical activity and sedentary behaviour for preschoolers were not in place at the time when regulations were set and have since been developed for both physical activity and sedentary behaviour for children in their early years in 2012 ([www.csep.ca/guidelines](http://www.csep.ca/guidelines)).

Current evidence-based research and guidelines need to be utilized to formulate new regulations that reflect the latest knowledge and effective practice to promote health and wellbeing for children in their early years.

OPHA has brought together stakeholders, including various health units from across Ontario, that have been working closely with child care providers at the municipal level to help strengthen healthy eating and physical activity. These activities range from shaping policy, providing training, developing resources and offering other supports and advice. I know this group would welcome the opportunity to share their experiences and expertise to support the ministry in shaping and implementing new standards, regulations and guidance documents and any other supportive tools and resources. In addition, OPHA hosts the Nutrition Resource Centre, a centre of expertise and knowledge translation and exchange on healthy eating and nutrition, and would be pleased to offer our services as needed ([www.NutritionRC.ca](http://www.NutritionRC.ca)).

Please do not hesitate to contact me at [pwalsh@opha.on.ca](mailto:pwalsh@opha.on.ca) should you have questions or wish to discuss our recommendations in detail.

Thank you for your consideration.

Yours sincerely,



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## **Recommendations for Strengthening and Updating Regulations on Healthy Eating and Physical Activity under the Child Care and Early Years Act, 2014**

### **Key Messages – Healthy Eating**

1. Provide nutrition standards based on the latest version of *Canada's Food Guide* as well as *Nutrition for Healthy Term Infants from Birth to Six Months* and *Six to 24 Months* for children under age two.

[\*Canada's Food Guide\*](#) only applies to children ages two and over while the [\*Nutrition for Healthy Term Infants from Birth to Six Months\*](#) and [\*Nutrition for Healthy Term Infants from Six to 24 Months\*](#) guidelines provide nutrition recommendations for children under two years of age and were developed by Health Canada, the Canadian Pediatric Society, Dietitians of Canada and the Breastfeeding Committee of Canada.

2. Develop provincial standards for food and menus for all child care settings (as per [\*Healthy Kids Panel recommendation 2.10\*](#)) and support with tools and resources for menu planning, developed and reviewed by registered dietitians who specialize in children's nutrition and public health.
3. Provide a standardized provincial education and training program and supporting tools and resources developed by registered dietitians for child care operators, early childhood educators and staff in all licensed childcare settings. This should cover food literacy and nutrition (including early childhood feeding issues) and guidance on providing appropriate and supportive healthy eating environments and positive meal time experiences and role modelling. Include further supports for early childhood educators to support parents in raising healthy children (as per [\*Healthy Kids Panel Recommendation 3.5\*](#)).
4. Follow Baby-Friendly Initiative (BFI) Guidelines. As outlined in the [\*Nutrition for Healthy Term Infants from Birth to Six Months\*](#) and [\*Healthy Kids Panel\*](#) breastfeeding is recommended exclusively for the first six months of life and continued up to two years of age and beyond, with the addition of safe and appropriate complementary foods. Child care providers can play a role by ensuring that their facilities promote and support breastfeeding. For instance, provide private space that breastfeeding mothers can use and prevent the promotion/distribution of infant formula.

### **Key Messages – Physical Activity**

1. Develop physical activity and play time standards based on the latest Canadian Physical Activity Guidelines and Canadian Sedentary Behaviour Guidelines for children in their early years (0-4 years) ([www.csep.ca/guidelines](http://www.csep.ca/guidelines)).
2. Develop safe and appropriate play and physical activities for children in the early years based on the latest evidence.

3. Provide a standardized provincial education and training program and supporting tools and resources, developed by physical activity specialists (i.e. CSEP certified) for child care operators, early childhood educators and staff in all licensed childcare settings. This should cover physical literacy, physical activity and sedentary behaviour information pertaining to early childhood as well as guidance for providing appropriate and supportive physical environments, positive physical activity experiences and role modelling. Include further supports for early childhood educators to support parents in raising healthy children.