



Sent by Mail and Email

August 14, 2017

Hon. Dr. Jane Philpott
Minister of Health
70 Colombine Driveway, Tunney's Pasture
Postal Location: 0906C
Ottawa, Ontario K1A 0K9

Dear Minister Philpott:

On behalf of the retail members of the Canadian Convenience Stores Association (CCSA), I write to respond to Health Canada's (HC) consultation, *Toward Restricting Unhealthy Food and Beverage Marketing to Children*, which we have also submitted through the online portal.

By way of background, there are **over 26,000 convenience stores** throughout Canada, which collectively **employ over 227,000 people** and **serve over 10 million customers daily**. While each of these stores are *small businesses*, collectively they pack a big economic punch, contributing more than \$56 billion per year to the Canadian economy. Our retail channel has been a staple of our local communities for decades. It provides employment and store ownership opportunities to new immigrants. Collects over \$21 billion in taxes that support vital public services. Most importantly, particularly for purposes of this consultation, ensures that essential consumer products are readily available in rural, urban and remote regions of the country.

Later this month (August 30), the CCSA will be hosting the first, national *Convenience Store Day* in Canada. An annual event, started in Atlantic Canada, celebrates the contributions that convenience store retailers make in the communities they serve. This year, we are proud to team-up with Children's Wish Foundation to help raise money for a very special little girl, who has courageously battled cancer. While convenience store retailers serve millions of customers a day, it's their role as community leaders, which makes C-stores the heart of our neighbourhoods!

With this backdrop, I table our members feedback to the first phase of HC's consultation on restricting marketing to kids. Let me start by stating our members support for the Federal Government's overall agenda of growing healthy communities. Our members are prepared to be active partners with the government in achieving this objective, which is why we have separately recommended supporting measures in our response to Finance Canada's 2018 pre-budget consultations. While our members stand ready to support efforts to promote healthy eating by Canadians, I would like to express our concerns about the approach being undertaken by HC with this consultation, which we believe fails to provide a fair and balanced approach to addressing the relationship between one's diet and their health, not to mention the potential implications for small, neighbourhood retailers.

A healthy eating strategy is important, but it must also complement the broader policy goals of the federal government on fostering growth and innovation in the marketplace, which includes food manufacturing. Our retail stores already stock innovative products from food manufacturers, some who are National Associate Members of our Association and have responded to changing consumer preferences by offering healthier options, alongside popular consumer snacks and beverages. Convenience stores are already positioned to play an important role in providing consumers with greater options for a balanced diet. Yet, none of these facts is reflected in the consultation document.

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Convenience stores are often the only source of fresh fruit and vegetables in rural and remote communities and in economically depressed regions of the country. There is a unique opportunity here to reduce the presence of food deserts across Canada by working with our retailers, including convenience store distributors, who are an integral part of the retail supply chain to ensure that everyday consumer products are available in convenience stores.

To that end, the CCSA has been a strong proponent of tax incentives to help small convenience retailers carry healthy food alternatives, which we continue to recommend as a measure to address food deserts to Finance Canada. Often these alternatives, like fruits and vegetables, require costly refrigeration equipment, and this prevents smaller convenience retailers from carrying them. This solution would also go a long way towards addressing food deserts in parts of our vast country. We hope HC will support this recommendation, particularly as their counterparts at Finance Canada prepare for the 2018 Federal Budget. We would be happy to meet with you and your officials to discuss this measure further.

Our small business retailers have invested heavily in their retail locations to ensure they are safe, family-friendly environments. Yet, there is no consideration of the impact that changes in this area could have on existing in-store layouts, which could be costly and/or impractical for many small retailers. As community leaders, our retail store owners take great pride in being able to provide valuable employment experience to young people entering the job market. Yet, there is no acknowledgement of the impact that changes to marketing of snacks and beverages could have on employee-employer relations. One CCSA member asked, "Could a 17-year-old employee now be prohibited from handling a bag of chips or chocolate bar?"

That's not to say that Canadians don't struggle with their waistlines. I have struggled with weight issues all my life. Now, as the father of an active 5-year-old, I worry less about what she picks up through TV, and more about what she picks up from my eating habits. The question is not whether our kids are at risk of being overweight. The real question is whether putting limits on food advertising is the answer to this challenge, which the consultation document suggests. While our retail channel is prepared to play an active role in promoting healthy eating, we believe a multi-faceted issue like the one being raised in this consultation requires a multi-faceted solution, which unfortunately the consultation document fails to acknowledge.

We therefore urge HC to meaningfully engage with our retail channel on any potential changes to marketing of foods and beverages in the marketplace. With so many unanswered questions, not to mention a consultation document that seems to have already arrived at the solutions, HC must consider the challenges that even well-intended policy measures could have on innovation, food manufacturing and the retail landscape in Canada.

We look forward to your response.

Sincerely,

Original Signed

Satinder Chera
President

cc: Brian Kaufmann, Senior Policy Advisor, Office of the Minister of Health