

HE-B2-1



Advertising Standards Canada
Les normes canadiennes de la publicité

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February 22, 2012

David L. Mowat, MBChB, MPH, FRCPC
Medical Officer of Health
Region of Peel
Health Services
7120 Hurontario Street
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Streetsville, Mississauga L5M 2C2

LEGISLATIVE SERVICES	
COPY TO:	FOR:
Chair	Committee ✓✓
CAO	✓✓
Corporate Services	Council
Public Works	
Employee and Business Services	
Health Services	File MOK ✓
Human Services	
Peel Living	

Dear Dr. Mowat,

We are in receipt of your February 7, 2012, letter regarding the importance of appropriate representation of use of fluoride toothpaste among children in television advertising, particularly in light of the Canadian Dental Association Position Statement on the *Use of Fluorides in Caries Prevention*.

We appreciated hearing these important concerns, and will ensure that this information is shared with advertisers and agencies involved in this category of advertising.

In addition to the CDA position statement, Section 9.1 of the *Food and Drugs Act* prohibits misleading advertising representations about the merit or safety of drug products, and Health Canada's *Consumer Advertising Guidelines for Marketed Health Products* includes a section requiring accurate product representation. These are designed, in part, to help ensure that representations in advertising reflect appropriate product use.

As part of ASC's mandate, ASC reviews all children's commercials, as well as consumer drug broadcast advertising, which includes the toothpaste category. In light of your concerns, we just completed a review of our files, but did not find any current, or even recent, Canadian commercials with depictions of children in toothpaste commercials. Our coverage, of course, is limited to Canadian advertising in Canadian media. Neither the Canadian regulatory nor self-regulatory regimes would apply should any of the commercials of concern to you have been broadcast from United States or other offshore media outlets.

Thank you for bringing this issue to ASC's attention.

Sincerely yours,

Linda J Nagel
President and CEO

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED _____ ✓

HE-B2-2

February 7, 2012

Advertising Standards Canada
175 Bloor St. East
South Tower, Suite 1801
Toronto, ON, M4W 3R8

Attention: Linda J. Nagel, President and CEO

Dear Ms. Nagel:

As Medical Officer of Health for the Region of Peel Health Services – Public Health department, I am writing to express concern regarding the misrepresentation of the use of fluoride toothpaste on television among children. In spite of Health Canada's recommendations on the appropriate use of fluoride for children, we note that fluoridated toothpaste advertisements consistency show a larger amount of toothpaste on the toothbrush than what is recommended.

The Canadian Dental Association (CDA), along with Health Canada, makes recommendations on the appropriate use of fluoride toothpaste among children. The CDA has issued a Position Statement on the Use of Fluorides in Caries Prevention. In this statement, the CDA recommends that children under three years of age should have an adult brush their teeth using a toothbrush moistened only with water. If risk of decay is determined by a dental health professional, a minimal amount of toothpaste (a portion the size of a grain of rice) is recommended for children under three years of age. Children between three and six years old should be assisted by an adult, using a small amount of toothpaste about the size of a green pea. Children over six should be supervised and assisted until they develop appropriate manual dexterity. These recommendations are made to achieve the benefits of fluoride in preventing tooth decay and to minimize the risk of developing dental fluorosis, a cosmetic discolouration of teeth.

Peel Public Health will continue to educate the public about the appropriate use of toothpaste among children to optimize its effectiveness for the prevention of tooth decay as well as its safe use. Consistent, clear messaging to the public will help ensure more children can enjoy lasting oral health benefits. We request that the Advertising Standards Canada give consideration to this issue, and support our efforts by ensuring the appropriate amount of fluoridated toothpaste is consistently and accurately depicted in toothpaste advertisements.

Health Services

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Tel: 905-799-7700 peelregion.ca

Public Health

Office of the Medical Officer of Health

We look forward to hearing your reply. Please do not hesitate to contact me if you require further information or clarification regarding the information that I have provided in this letter.

Sincerely,



David L. Mowat, MBChB, MPH, FRCPC
Medical Officer of Health

c: Janette Smith, Commissioner of Health Services
Emil Kolb, Regional Chair

John Coyne
Chair of the Board
Advertising Standards Canada
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The Honourable Leona Aglukkaq
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Chief Dental Officer
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Dr. Arlene King
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