



March 16, 2017

Honourable Terry Lake  
Minister of Health  
PO Box 9050 Stn Prov Govt  
Victoria, BC V8W 9E2

Dear Minister Lake,

I am writing on behalf of First Call: BC Child and Youth Advocacy Coalition's Early Childhood Roundtable to inquire about the change made to the Child Care Licensing Regulation last July that reduced the minimum outdoor play space per child from 7 square metres to 6 square metres in a licensed child care program.

At the time this change was made we invited Dawn Williams, Senior Program Manager in your ministry, to attend our September meeting to discuss this change with us, but she declined. Our questions about the reasons for this change, which we know to be a reduction in the quality of play space for young children, therefore remain unanswered.

This reduction in play space per child is contrary to the expert evidence on children's play. Child to space density impacts levels of aggression, the mood, and the types of play, and the amount of gross motor activity in outdoor play spaces. Experts' research indicates that 14 square metres is ideal to enable more gross motor activities for children's physical health and more diverse types of play for their social and emotional health. The threshold dimensions of an aggressive space are 7.62 square metres per child. (For comparison, the minimum jail cell size for single occupancy in Canadian jails is 7 square metres.) The City of Vancouver's Child Care Design Guidelines recommend 14 square metres per child, which is roughly the size of a parking stall. Many European countries require even larger outdoor play spaces per child. (Please see enclosed visual illustrations for context.)

The previous provincial standard of only 7 square metres was thus already too small. Recent studies have found that gross motor movement is decreasing among young children, contributing to obesity in school children. If child health and safety were the priority, the logical amendment to the regulation would have been to require more space per child.

Given this evidence, we are still seeking to have the ministry answer our questions about the reasons for the reduction in outdoor play space requirements your government made last year.

**putting children and youth first**

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- 1) Why was this change made?
- 2) Who requested this change?
- 3) Who did the ministry consult prior to making this change?
- 4) Does the ministry have a plan to track how many child care programs operate with only 6 square metres of outdoor play space per child and to evaluate the impacts of this change on children's health?

We are requesting an opportunity to meet with you to discuss this regulatory change, or with a senior policy official who can answer our questions.

We look forward to your response.

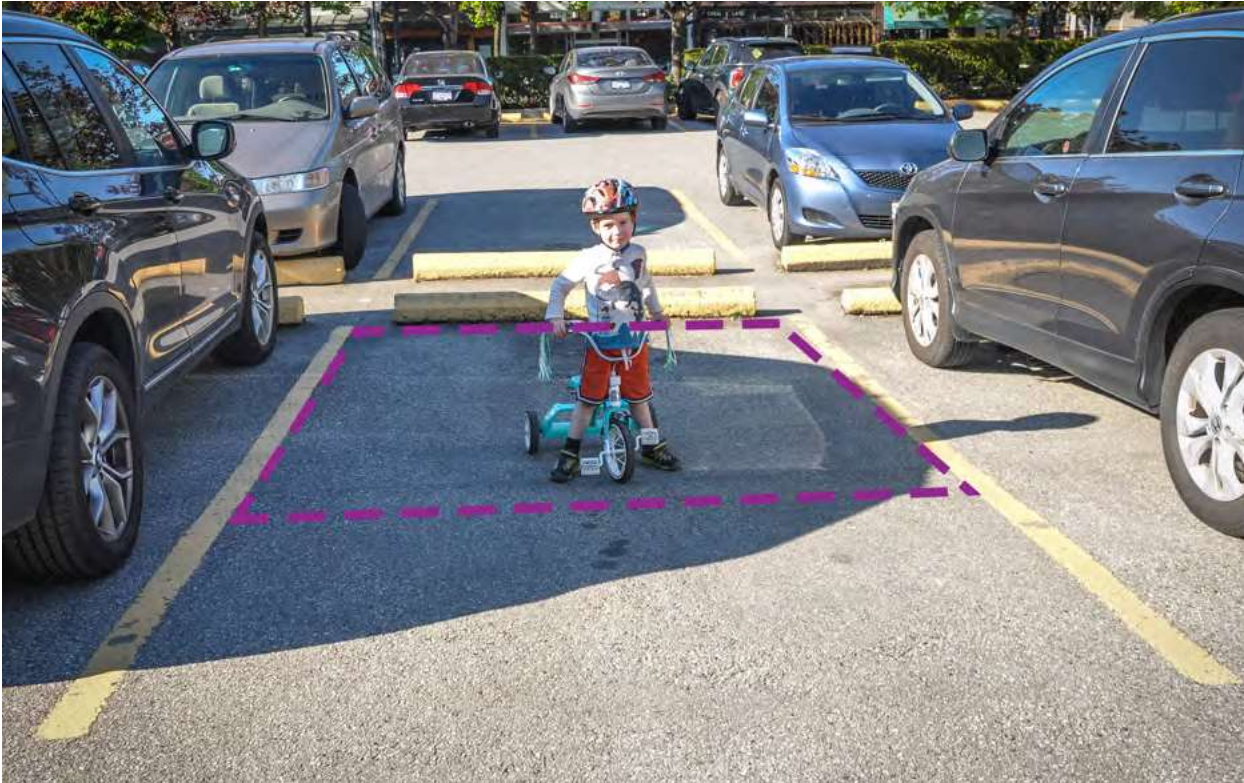
Sincerely,

Adrienne Montani  
Provincial Coordinator

Copy: Judy Darcy, Opposition Spokesperson for Health

Enclosure

Provincial Standards: half a parking stall is about 7m<sup>2</sup>



Vancouver's Guidelines for a 25-space (3-5 program): **350m<sup>2</sup>**



Provincial Standards for a 25-space (3-5 program):  
**175m<sup>2</sup>**

