



October 31, 2017

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

Dear Minister Dix,

I am writing on behalf of First Call: BC Child and Youth Advocacy Coalition's Early Childhood Roundtable to bring to your attention the change made to the Child Care Licensing Regulation by the previous government in July 2016 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 2016 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 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 understand that as a new minister of health you have many priorities to address and that your government is in the process of developing a universal, affordable, high-quality child care plan for BC, including accelerated creation of new child-care spaces across the province.

We ask that your ministry review the evidence about appropriate play space for young children and revise the regulation for licensed programs to increase the minimum outdoor play space per child in the interests of the health and well-being of the thousands of young children who are in and will be in licensed child care programs.

We would be happy to supply additional research evidence on this topic to officials in your ministry and would welcome the opportunity to meet with you or a senior policy official to discuss the need for this change.

We look forward to your response.

Sincerely,

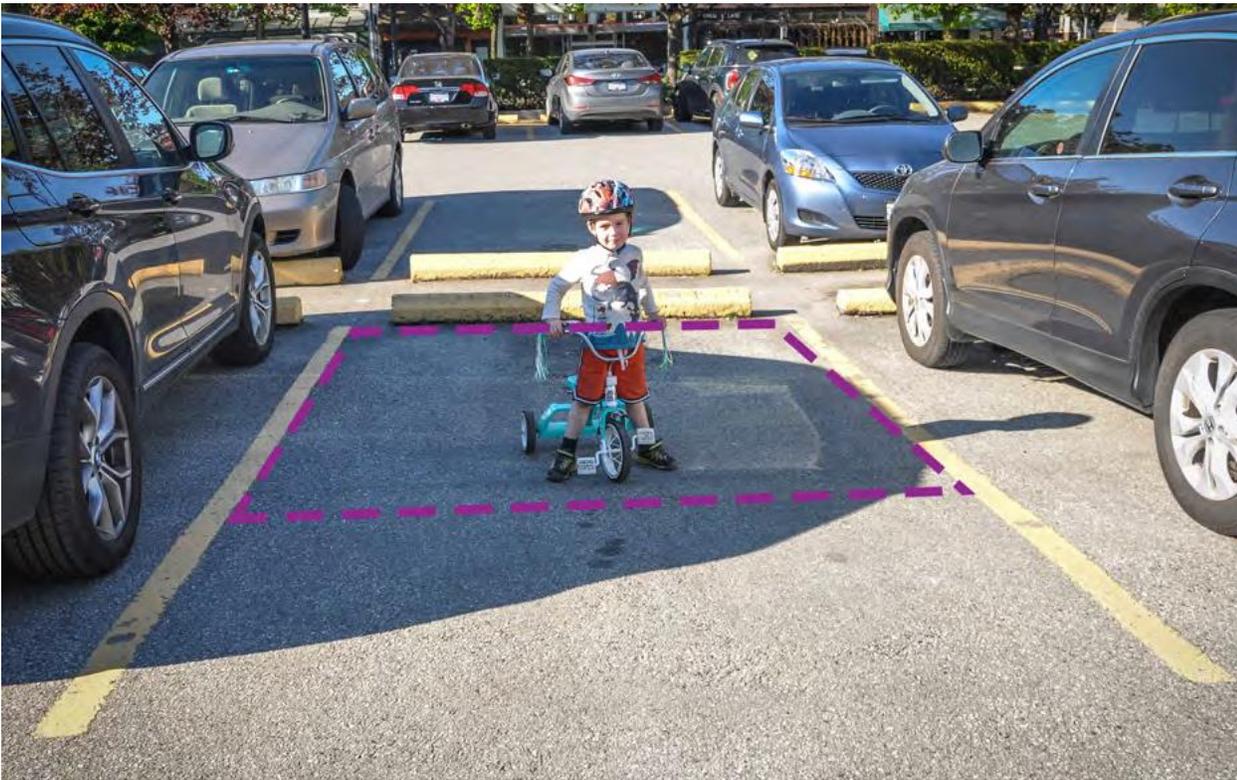


Adrienne Montani
Provincial Coordinator

Copies: Hon. Katrina Chen, Minister of State for Child Care
 Mike Bernier, Liberal critic for Health
 Joan Isaacs, Liberal critic for Health
 Andrew Weaver, Leader, BC Green Party
 Stephen Brown, Deputy Minister of Health

Enclosure

Provincial Standards: half a parking stall is about 7m²



Vancouver's Guidelines for a 25-space (3-5 program): **350m²**



Provincial Standards for a 25-space (3-5 program): **175m²**

