



September 19, 2018

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

Dear Minister Dix,

This letter is following-up on your ministry's February 22, 2018 response to our letter dated October 31, 2017 on behalf of our Early Childhood Development Roundtable expressing our concern about the July 2016 change to the Child Care Licensing Regulation that reduced the minimum outdoor play space per child from 7 square metres to 6 square metres in a licensed child care program.

In her reply on your behalf, Director Sue Bedford stated this amendment was made "in response to concerns about the high cost of real estate in B.C. and the negative impact that this has on creating additional affordable child day care spaces."

Our Roundtable participants asked me to write to you again on their behalf to challenge the use of this economic rationale for maintaining this amendment, as it flies in the face of the evidence about the importance of outdoor play to the health of young children.

We shared some of this evidence with you in our October 2017 letter, noting that 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 per child, roughly the size of a parking stall, 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. The City of Vancouver's Child Care Design Guidelines recommend 14 square metres per child and many European countries require even larger outdoor play spaces per child. (Please see enclosed visual illustrations for context.)

Recent studies have found that gross motor movement is decreasing among young children, contributing to obesity in school children. The previous provincial standard of only 7 square metres was already too small, making the 2016 amendment contrary to the evidence about necessary outdoor play space requirements in quality child care settings.

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We applaud government's commitment to building a quality universal child care system for BC children and families and the significant investments now rolling out to reduce parent fees, create more spaces and support the recruitment and retention of more early childhood educators. However, allowing real estate prices to drive licensing requirements will not produce the high quality system desired. Now, as the system expands, is a crucial time to make sure B.C.'s licensing policies are based on the evidence of what is good for children's health.

We strongly recommend 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 back up to 7 square metres in the interests of the health and well-being of the thousands of young children who are and will be in licensed child care programs.

We appreciate your re-consideration of this issue and look forward to your response.

Sincerely,

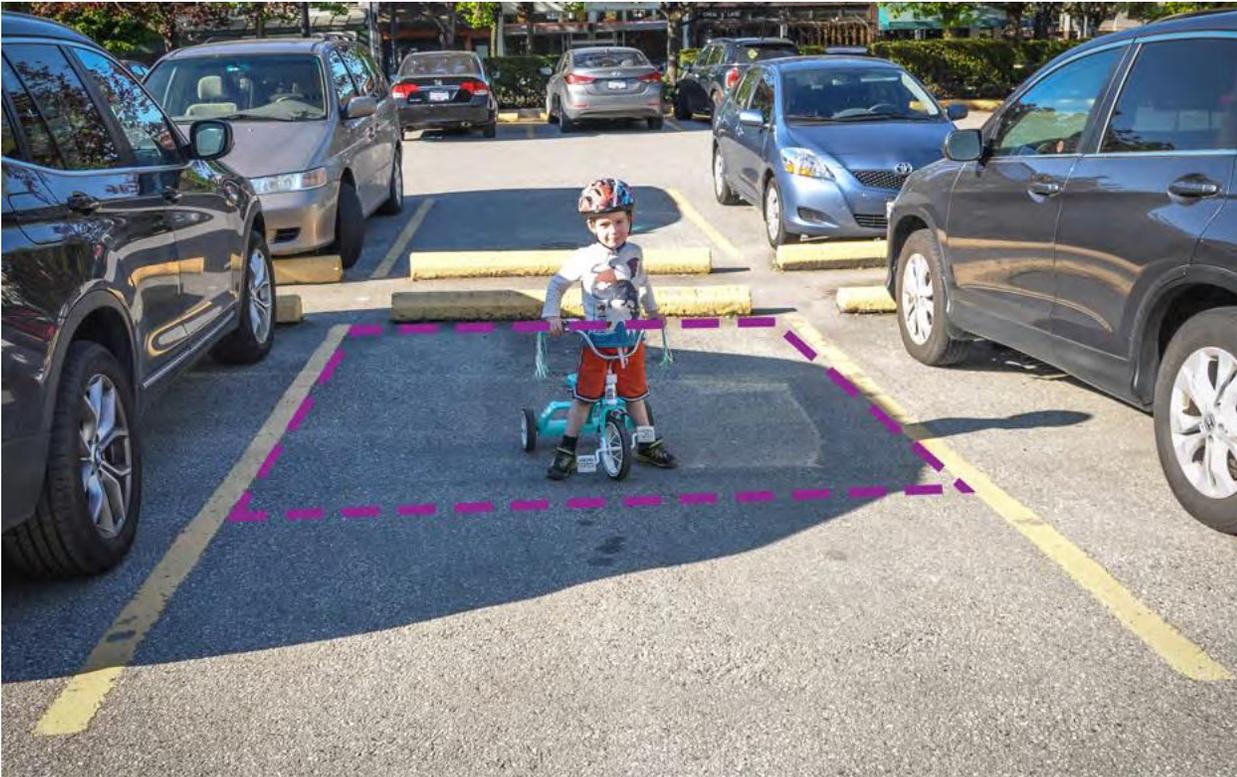
A handwritten signature in cursive script, appearing to read 'Adrienne Montani'.

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
Sue Bedford, Director, Community Care Facility Licensing, MOH
Christine Massey, Assistant Deputy Minister, Early Years and Inclusion, MCFD

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**

