



January 15, 2025

London Transit Commission Board of Directors

% Stephanie Marentette

450 Highbury Ave. N.

London, Ontario

N5W 2C5

Emailed to croy@londontransit.ca as per Caroline Roy, Commission Secretary

Dear Ms. Marentette;

On behalf of Anova's Board of Directors, we are writing to share our concerns regarding a bus ad that ran on London Transit Commission (LTC) buses in December 2024, as reported by the CBC on December 20th, 2024 ("**the Ad**"). The Ad's messaging is potentially harmful to young people who may be receiving, or who may seek to receive, medical care related to gender identity.

For the reasons set out below, we respectfully request that LTC's Board of Directors review the Ad, and its compliance with LTC's Advertising Policy.

LTC's Advertising Policy

LTC's Advertising Policy (2020) emphasizes the following:

- a) LTC decisions related to the content of proposed advertisements will be guided by the *Canadian Charter of Rights and Freedoms* ("**the Charter**");
- b) LTC cannot limit the expression of a party who advertises with them unless LTC has a pressing and substantial objective in doing so;
- c) Where the *Charter* rights of advertisers conflict with the rights of other individuals and groups, LTC will strive to seek an appropriate balance between the rights of both parties; and
- d) LTC will be guided by the principles of the Ontario *Human Rights Code* in avoiding discrimination against advertisers and members of the public.

Reasons for Review

Anova believes the Ad violates LTC's advertising policy, and therefore warrants review, for the following reasons:

- a) The Ad promotes false and misleading information. By highlighting "medical transitions", the Ad fails to recognize that gender-affirming health care seeks to validate and support transgender, nonbinary, two-spirit, gender nonconforming, and gender-diverse identities, rather than alter these identities. It is also important to note that gender-affirming health care is recognized and endorsed by medical associations in Canada, including the Canadian Psychological Association and the Canadian Pediatric Society.
- b) The Ad has the potential to harm transgender and gender-diverse youth, and therefore, there is a pressing and substantial objective in limiting publication of the Ad. A 2022 study published in the Canadian Medical Association Journal found that transgender and gender-diverse youth are 5 times more likely to *consider* suicide. Additionally, trans youth are 7.6 times more likely to *attempt*

suicide. Notably, research from a study completed by the Schulich School of Medicine and Dentistry identified that implementing policy changes can significantly reduce the high suicide rates among transgender youth. This underscores the critical importance of restricting harmful content like the Ad, as evidence demonstrates that supportive policies and interventions can play a pivotal role in safeguarding the mental health and lives of transgender and gender-diverse youth.

- c) The Ad does not seek to avoid discrimination and does not strike an appropriate balance between the rights of advertisers and the rights of transgender and gender-diverse youth. Under the Ontario *Human Rights Code*, and specifically in relation to the use of facilities and services, people are protected from discrimination and harassment because of gender identity and gender expression. The Ad does not respect this protection.
- d) The Ad does not comply with the City of London's Strategic Plan, which commits to supporting and creating safety for transgender, nonbinary, two-spirit, gender nonconforming and gender-diverse communities.

As board members, we have a responsibility to act for vulnerable community members who rely on our services. Therefore, we strongly urge LTC's Board of Directors to review both the Ad, and the policy that allowed it to be posted on LTC buses.

We recognize that the work of Boards of Directors can be complex and challenging. We are hopeful that LTC understands the concerns presented in this letter, and is committed to addressing the matter in a way that can facilitate meaningful and lasting change, especially in relation to the protection of vulnerable trans and gender-diverse youth.

Sincerely,



Zohra Bhimani
Anova Board of Directors
Advocacy Committee Chair



Rachel Pringle
Anova Board of Directors
Chair



Jessie Rodger
Anova Executive Director