



The Honourable Jean-Yves Duclos
Minister of Families, Children and Social Development
House of Commons
Ottawa, ON K1A 0A6
Via email: povertyreduction@canada.gc.ca

June 30, 2017

Dear Minister Duclos,

We are writing to provide feedback on the development of a Canadian Poverty Reduction Strategy, on behalf of the [Ontario Society of Nutrition Professionals in Public Health](http://www.osnp-ph.on.ca) (OSNPPH). OSNPPH is the independent and official voice of Registered Dietitians working in Ontario's public health system.

We commend the Government of Canada for committing to the development of a national poverty reduction strategy so that all Canadians can reach their full potential for health and well-being. Food insecurity, inadequate or insecure access to food because of financial constraints, is a serious social and public health problem that affected 4 million Canadians in 2012.ⁱ In the 2012 reportⁱⁱ on his mission to Canada, the United Nations Special Rapporteur on the right to food noted that Canada's protection of economic and social rights of its citizens, including the right to food, has been less exemplary (compared to protection of civil and political rights) and the magnitude of poverty contravenes Canada's commitment to ensure the basic right to food for all citizens.

The inability to afford such a basic necessity as food is strongly associated with other financial hardships and therefore food insecurity is a highly sensitive measure of material deprivation.ⁱⁱⁱ Food insecurity is a potent predictor of poorer physical and mental health, independent of other well-established social determinants of health such as income and education.^{iv} Food insecurity increases the risk of chronic and infectious diseases, and negatively impacts mental health and child development. Food insecurity also places a large burden on our health care system, since household food insecurity is a strong predictor of health care utilization and costs.^v The principal root cause of food insecurity is poverty, which must be addressed through systemic, targeted and sustainable approaches, such as a basic income guarantee.^{vi,vii}

The basic income guaranteed to seniors in Canada has been shown to reduce food insecurity risk by 50%.^{viii} However, single working-age people with low incomes, post-secondary students, and low income families headed by working age parents with children over 18 years, among others, remain vulnerable to poverty. The inclusiveness of a basic income strategy, and its ability to address income adequacy, are important advantages of a basic income guarantee to addressing poverty and food insecurity.^{vii}

In *Towards a Poverty Reduction Strategy – Discussion Paper*, food bank usage data were used as evidence of high rates of food insecurity in Canada. We strongly recommend the use of the Canadian Community Health Survey (CCHS) Household Food Security Survey Module (HFSSM) to monitor changes in food insecurity. In contrast to other measures used to measure food insecurity, the CCHS HFSSM is evidence informed and is rigorous and systematic in its implementation. Measuring food insecurity based on food bank usage greatly underestimates the prevalence of food insecurity and does not allow for understanding the degree of food insecurity (marginal, moderate or severe) being experienced. Marginal food insecurity rates need to be

captured as there are specific health impacts related to being marginally food insecure as opposed to being food secure.

We recently learned that the measurement of food insecurity on the CCHS was optional in 2015 and 2016, and Ontario, Newfoundland and Labrador, and the Yukon opted out. Regular monitoring of household food insecurity is crucial for population research and evidence-based policy decision making in Canada. To ensure consistent food insecurity data are available at a national level, we recommend that the CCHS HFSSM become a core module, whereby the provinces and territories are not able to opt-out. Further, we recommend that household food insecurity (as measured by the CCHS HFSSM) be used as an indicator in the Canadian Poverty Reduction Strategy given it is an excellent indicator of material deprivation.

The federal government has the opportunity to plan, develop and implement a strategy that would address the underlying cause of food insecurity. Thank you for the opportunity to comment. Please feel free to contact us at executive@osnpph.on.ca to discuss this further.

Sincerely,



Candice Einstoss, RD
OSNPPH Co-Chair Year 2



Mary Ellen Prange, RD
OSNPPH Food Security Workgroup Co-Chair

cc. The Right Honourable Justin Trudeau, Prime Minister of Canada
The Honourable Patricia A. Hajdu, Minister of Employment, Workforce Development and Labour

ⁱ Tarasuk V, Mitchell A, Dachner N. 2015. Household food insecurity in Canada, 2013. Toronto: Research to identify policy options to reduce food insecurity (PROOF). <http://proof.utoronto.ca/>. Accessed 16 June 2017.

ⁱⁱ De Shutter O. Report of the Special Rapporteur on the right to food. http://www.srfood.org/images/stories/pdf/officialreports/20121224_canadafinal_en.pdf. Published December 24, 2012. Accessed 16 June 2017.

ⁱⁱⁱ Loopstra R and Tarasuk V. 2013. What does increasing severity of food insecurity indicate for food insecure families? Relationship between severity of food insecurity and indicators of material hardship and constrained food purchasing. *Journal of Hunger and Environmental Nutrition*, 8:337-349.

^{iv} Gunderson C and Ziliak J. 2015. Food insecurity and health outcomes. *Health Affairs*, 34(11): 1830-1839.

^v Tarasuk V. et al. 2015. Association between household food insecurity and annual health care costs. *Canadian Medical Association Journal*. <http://www.cmaj.ca/content/early/2015/08/10/cmaj.150234> Published August 2015. Accessed 21 June 2017.

^{vi} Ontario Society of Nutrition Professionals in Public Health. Position Statement on Responses to Food Insecurity. <https://www.osnpph.on.ca/upload/membership/document/2016-02/position-statement-2015-final.pdf>. Published November 2015. Accessed 16 June 2017.

^{vii} Tarasuk, V. Implications of a Basic Income Guarantee for Household Food Insecurity. Northern Policy Institute, Research Paper No. 24. <http://proof.utoronto.ca/wp-content/uploads/2017/06/Paper-Tarasuk-BIG-EN-17.06.13-1712.pdf>. Published June 2017. Accessed 16 June 2017.

^{viii} Emery H, Fleisch V, McIntyre L. How a guaranteed annual income could put food banks out of business. University of Calgary: The School of Public Policy Research Papers [serial online]. 2013;6(37):1 <http://www.policyschool.ucalgary.ca/?q=content/how-guaranteed-annual-income-could-put-food-banks-out-business>. Accessed 16 June 2017.