

December 19, 2017

Ministry of Community and Social Services  
Communications and Marketing Branch  
Via email: [incomesecurity@ontario.ca](mailto:incomesecurity@ontario.ca)

Dear Madam or Sir:

[Ontario Dietitians in Public Health](http://www.odph.ca) (ODPH), formerly known as the Ontario Society of Nutrition Professionals in Public Health (OSNPPH), is writing to congratulate the Ministry of Community and Social Services (MCSS) on the release of "Income Security – A Roadmap for Change" and to offer our feedback. We commend the valuable work that has been accomplished by the three working groups that contributed to the Roadmap for Change and strongly encourage implementation of the reports' recommendations.

ODPH is the independent and official voice of Registered Dietitians working in Ontario's public health system. Our members are mandated by the Ministry of Health and Long-Term Care to provide healthy eating expertise on programs and services that support healthy growth and development and reduce chronic diseases.

Monitoring food affordability through costing the Nutritious Food Basket (NFB) is a mandated annual activity carried out by ODPH members. Year after year, analyses using NFB data clearly indicate that families and individuals living on minimum wage incomes or receiving social assistance do not have enough money to cover essential costs of living. When incomes are too low, people are forced to choose between paying rent and other expenses, including nutritious food, and are likely to experience food insecurity.

Food insecurity – inadequate or insecure access to food because of financial constraints – is a serious public health problem because individuals' health and well-being are closely linked with having adequate income to purchase sufficient food. According to [Household Food Insecurity in Canada 2014](#), 594,900 households\* in Ontario experienced food insecurity (page 10). The majority (58.9%) of Ontario households struggling to put food on the table are part of the labour force but trapped in low-paying or unstable jobs (page 13). Food insecurity affected 64% of Ontario households reliant on social assistance (page 12). Income-related barriers to accessing adequate amounts of nutritious food are barriers to good health and predictably lead to increased health care utilization.

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\* Note: The Roadmap for Change incorrectly states (third bullet on page 157), "over half a million people face challenges accessing affordable healthy food." The correct statistic from Household Food Insecurity in Canada 2014 is 594,900 households in Ontario experienced food insecurity. This number of households translates into more than 1.5 million Ontarians.

**Income security reform is needed immediately** to address the high prevalence of food insecurity particularly among social assistance recipients and those with precarious employment. Individuals and families living in poverty cannot afford to wait 10 years for the recommendations within this report to be implemented. We urge you to consider a faster implementation period of three to five years.

ODPH strongly supports the recommendation to adopt a Minimum Income Standard for Ontario and the development of a made-in-Ontario Market Basket Measure (MBM) that reflects the actual costs of essential expenses including housing, food, utilities, clothing, transportation, telecommunications, etc. that can be used to evaluate progress towards achieving the Minimum Income Standard. ODPH would be pleased to offer expertise on food costing given our longstanding experience with costing the NFB.

While the cost of implementing the recommendations in the Roadmap for Change will be significant, costs of inaction or only partial adoption will be much higher in the longer term. It is imperative that the Ontario government take concrete and immediate action to ensure adequate incomes to alleviate the dire level of poverty that currently exists in our province.

Sincerely,



Erinn Salewski, RD  
ODPH Co-chair



Mary Ellen Prange, RD  
Chair, ODPH Food Insecurity Workgroup

cc. Hon. Dr. Eric Hoskins, Minister of Health and Long-Term Care  
Pegeen Walsh, Executive Director, Ontario Public Health Association  
Loretta Ryan, Executive Director, Association of Local Public Health Agencies  
Jennifer Bucchino, Regional Executive Director, Dietitians of Canada  
PROOF – Food Insecurity Policy Research, University of Toronto