



Response to “Setting the Table: Food Insecurity and Costs in Ontario’s North”, Northern Policy Institute Commentary No. 26.

Melillo, E. (2018, December). *Setting the Table: Food Insecurity and Costs in Ontario’s North*. Northern Policy Institute. Retrieved from <https://www.northernpolicy.ca/upload/documents/publications/commentaries-new/commentary-melillo-cof-en-19.01.18.pdf>

Issue	Location in the Commentary	Evidence
Improper use of the Nutritious Food Basket data, namely the NFB being used to compare two different health unit regions. According to the Ministry guidelines only a North vs South comparison is deemed appropriate. In addition, the reference to where this info was obtained (page 7 graphic) does not clearly identify the source (The information, in the format it is presented, is usually sent from the Ministry to the health units who conducted the Nutritious Food Basket, and it is not considered a public document.)	Pages 5, 7 (graphic) and 9	http://www.ontla.on.ca/library/repository/mon/24006/302017.pdf (Page 14) “The mix of stores and the approach to store selection may be quite different between health units, making between health unit comparisons inappropriate”. “Regional comparisons: North and south regional comparisons of cost and/or percent change are appropriate...”
Incorrect definition for food insecurity, according to the citation provided: “unable to obtain a nutritionally adequate and culturally appropriate diet due to financial restrictions and other barriers ”. This is important because the advocacy work around food insecurity is based on the essential premise that its root cause is poverty, and the strategies needed to address it need to focus on increasing Canadians’ income (not “other barriers”).	Page 5	https://www.dietitians.ca/Downloads/Public/HFI-Position-Statement-and-Recommendations-DC-FINA.aspx (Page 3) “Food insecurity, at the household level, refers to inadequate or insecure access to food because of financial constraints”

Issue	Location in the Commentary	Evidence
<p>Conflation of the definitions of food security and food insecurity in multiple sections of the commentary. Bottom-line, strategies to address food insecurity are income based, while strategies to promote food security can take many forms (e.g. improve physical access to food).</p>	<p>Page 11 <i>“The result is that people can earn more income and potentially achieve food security as the gap between the cost of living and income narrows or becomes non-existent.” ; “At the provincial level, there are initiatives in place to address food insecurity across Ontario as part of the Food Security Strategy”</i></p>	<p>https://www.civicgovernance.ca/wordpress/wp-content/uploads/2014/04/Poverty-and-Access-to-Food-Lynn-McIntyre.pdf</p> <p>https://proof.utoronto.ca/wp-content/uploads/2017/03/PROOF-webinar-slides-food-insecurity-measurement-in-Canada.pdf</p>
<p>Overall focus on high food cost as the main cause of food insecurity (also forgetting about other concerns of the quality of the food provided). The definition (partially incorrect) shared on page 5 specifically says that lack of proper income is the root cause for food insecurity. This is an issue as focusing on high food cost led to specific recommendations that while pertinent for the issue (and important to consider as well), are not pertinent to address, truly, food insecurity, and are not in line with what other major stakeholders have been advocating for (i.e., adequate social assistance rates). In addition, no</p>	<p>Page 5 (mentioning lowering food costs as a way to address food insecurity in the north). Page 11, comment of ineffectiveness of the Nutrition</p>	<p>https://www.odph.ca/upload/membership/document/2016-02/position-statement-2015-final.pdf (Page 1) “An income response is required to effectively address food insecurity”</p> <p>https://proof.utoronto.ca/</p>

Issue	Location in the Commentary	Evidence
mention to the fact that Ontarians with adequate incomes actually spend a low percentage of income on food, compared to other developed countries, and that simply reducing food cost would have a significant impact in our farmers' community, already struggling to survive.	North program due to higher levels of food insecurity.	
Fail to acknowledge evidence provided by ODPH and health units that social assistance levels are indeed insufficient to overcome high food costs, and to explicitly note that food insecurity is a result of the total income not matching the true cost of living.	Pages 8 and 9	https://www.phsd.ca/wp-content/uploads/2015/01/NFB_Scenarios_Eng_2017.jpg (example of the work most health units do annually, comparing food cost & rent with total income, particularly for those on social assistance, to check the adequacy of the values of assistance provided)
Description of the Northern Fruit & Vegetable program. Contrary to what is shared in the commentary, this program does not provide adequate servings of vegetables and fruits to students. It provides only 2 servings per each student/week (and that amount can be different among health units). In addition, this program is described as " <i>a solid step towards alleviating food insecurity</i> ". It has been well described that the goal of this and similar programs is to promote food literacy; given that they do not address the root cause of food insecurity, poverty, they cannot be considered as alleviating food insecurity – the lack of financial means is still there. The same comment applies to the reference made to the Community Food Centres Canada goal (it does not address food insecurity, rather create opportunities for individuals to advocate for poverty-reduction policies)	NFVP – page 13 CFCC – page 13	https://www.nwhu.on.ca/ourservices/HealthyLiving/Pages/Northern-Fruit-and-Vegetable-Program-(NFVP).aspx The goals of the program are to: -Increase consumption and awareness of fruits and vegetables among elementary school students in Northern Ontario; educate around the consumption of fruits and vegetables, healthy eating and regular physical activity; provide resources to children and their families around the importance of fruit and vegetable consumption and regular physical activity for good health and the prevention of chronic diseases. https://cfccanada.ca/en/About-Us/Mission-and-Vision https://www.publichealthontario.ca/-/media/documents/ldcp-food-literacy-call-to-action.pdf?la=en (Page 9)
Two different indicators are being compared when comparing Toronto, Attawapiskat and Porcupine: the values for Toronto and Porcupine are from the Nutritious Food Basket , while the ones for Attawapiskat are from	Pages 7 and 8	https://foodsecurecanada.org/paying-for-nutrition http://publications.gc.ca/collections/collection_2008/inac-ainc/R3-56-2007E.pdf

Issue	Location in the Commentary	Evidence
the Revised Northern Food Basket . These baskets are different in, for example, the food listed. Additionally, on page 12, where it mentions that “airships...can reduce the cost of the Nutritious Food Basket...”, it should be read Revised Northern Food Basket instead.		https://www.nutritionnorthcanada.gc.ca/eng/1519997966920/1519998026166
Overall failing to acknowledge high complexity of issues such as food insecurity in Northern Ontario (both connected and not connected, which means that complex solutions are also needed (not just adding roads or increase the Nutrition North Canada values) and some of the solutions provided can be complex issues themselves (i.e. roads) and not what the community is looking for.	Page 11	