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February 10, 2021

Hon. Todd Smith  
Minister of Children, Community and Social Services  
[prso@ontario.ca](mailto:prso@ontario.ca)  
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Dear Minister Smith,

[Ontario Dietitians in Public Health \(ODPH\)](#) is writing to offer feedback about the recently released poverty reduction strategy for Ontario, [Building a Strong Foundation for Success: Reducing Poverty in Ontario \(2020-2025\)](#).

ODPH is the independent and official voice of Registered Dietitians (RDs) working in Ontario's public health system. ODPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents through the implementation of the Ontario Public Health Standards.

Last year, [we participated](#) in the online consultation to inform the development of Ontario's 2020-25 poverty reduction strategy. Our submission emphasized the importance of addressing food insecurity as part of the poverty reduction strategy and provided recommendations to effectively address this urgent problem in Ontario. ODPH has reviewed the strategy and has a number of concerns we would like to convey.

The scope of our members' work within Ontario's public health system includes monitoring food affordability, as part of the [Ontario Public Health Standards](#). Year after year, data from across the province show that low income households struggle to afford the costs of living, including food.<sup>1,2,3,4,5,6</sup>

Food insecurity is defined as inadequate or insecure access to food due to financial constraints.<sup>7</sup> It is a highly sensitive measure of material deprivation and is closely correlated with poor physical and mental health,<sup>7</sup> which is why we are so concerned about this problem from a public health perspective. There is also a strong association of greater health care utilization by those who are food insecure compared to those who are food secure.<sup>8</sup>

It is the magnitude of this problem that is particularly concerning. In 2017-2018, 13.3% (more than 1 in 8) of households in Ontario experienced food insecurity, which translates to over 1.7 million people.<sup>7</sup> Recent national estimates report that food insecurity rates have increased in Canada during the COVID-19 pandemic to approximately 1 in 7 households,<sup>9</sup> as a result of the widespread labour disruptions due



to COVID-19. Thus, it is critical to include targets for reducing food insecurity in Ontario's poverty reduction strategy.

ODPH recently released an updated [Position Statement and Recommendations on Responses to Food Insecurity](#). It summarizes the evidence to date about food insecurity in Canada and Ontario, including effective policy interventions to address the problem on a population level, and provides recommendations for decision makers. Our recommendations for the province of Ontario include:

- Report on the results of the poverty reduction strategy consultation that closed on April 30, 2020.
- Develop a poverty reduction strategy that includes targets for reduction of food insecurity as well as policy interventions that improve the financial circumstances of very low income households.
- Set a minimum wage rate that more closely aligns with costs of living in Ontario.
- Establish a Social Assistance Research Commission, as recommended in Bill 60, to determine evidence-based social assistance rates in communities across the province based on local/regional costs of living, including the cost of food informed by data collected by public health units.

None of these recommendations, which are consistent with [our submission](#) to the online consultation, are addressed in the poverty reduction strategy, nor is there any mention of monitoring or addressing food insecurity.

Following are ODPH's concerns regarding the strategy:

1. **A summary report of the 2020 online consultation has not been released.** The [website](#) states that over 2,500 responses and 280 submissions were received through the consultation, demonstrating that many citizens and organizations in Ontario had something important to share to inform the development of the poverty reduction strategy. Releasing a summary report of this information is important for transparency related to what was heard, and how it influenced the strategy. Some of the key themes that emerged from the consultation shared on the website are not actively addressed in the plan for poverty reduction, particularly related to affordable housing, homelessness and working poverty.
2. **The target outlined in the strategy focuses exclusively on moving people from social assistance into the workforce.** The executive summary states that the strategy recognizes different experiences of poverty, but the target focuses on social assistance, and does not discuss anything related to other population groups experiencing poverty, such as those who are unable to work, or those who are working but are trapped in precarious, low paying jobs. It is unreasonable to expect people to be ready to enter the work force when they are struggling day to day, dealing with the physical and mental health consequences of living in poverty. In addition, the majority of



households experiencing food insecurity have income from employment<sup>7</sup>, providing evidence that having employment is not protective against food insecurity, and that income from low waged jobs and seasonal/part time hours do not cover the costs of living. Minimum wage in Ontario is insufficient to keep people out of poverty, and more must be done to ensure employed Ontarians are able to meet their basic needs.

3. **The details of the utilization of the Market Basket Measure (MBM) as measure of poverty in Ontario are unclear.** It is not clear if the MBM will be aligned with the [federal model](#), in terms of what items will be included in the basket, and whether or not the information will be collected at the provincial level, or if the federal calculations will be used. As mentioned, public health units across Ontario already monitor food costs annually, and this information could be meaningfully utilized as part of the MBM to assist with accurately measuring the costs of living, and thus, poverty, in Ontario.
4. **There is no indication that the MBM will be used to inform social assistance rates, and no acknowledgement that current social assistance rates are too low.** Social assistance rates in Ontario are not reflective of the costs of living in Ontario and are not currently indexed to inflation, as increases have not been made to the rates since 2018.<sup>10</sup> The work our members do across the province related to monitoring food affordability demonstrates that social assistance recipients are living in dire situations of extreme poverty.<sup>1,2,3,4,5,6</sup> Of particular note are single people relying on Ontario Works; the monthly rate is not enough to cover rent and food, let alone other costs of living.
5. **The strategy will not improve the immediate financial situations of very low income households.** None of the key initiatives highlighted under Pillar #3 are new, and will not immediately improve the financial circumstances of low income households in Ontario. While the programs noted may provide a small amount of financial relief for some households at various points in time (e.g. tax season), they will not be enough to make a difference in the day to day lives of Ontarians struggling to make ends meet. The exception is the Ontario Child Benefit (OCB), which is indexed to inflation<sup>10</sup> and has been proven to reduce food insecurity among very low income households with children, demonstrating that income transfer payments are effective at reducing food insecurity.<sup>11</sup> While the OCB is an important aspect of poverty reduction in Ontario that must be maintained, it is highlighted within the strategy as an existing support available, not that increases will be made or the program will be expanded in any way, suggesting that the program will remain status quo and will not further reduce poverty in Ontario.
6. **While the focus of the strategy is getting people off social assistance, improving the existing social assistance system is not addressed.** We understand that the COVID-19 response has been the most pressing priority over the past year. However, [Bill 60](#) has been with the Standing Committee on the Legislative Assembly since May 2019. Prioritizing the passing of Bill 60 and establishing a Social



Assistance Research Commission to make recommendations about social assistance in Ontario is an important step forward in ensuring our social assistance system is meeting the needs of recipients.

7. **The strategy relies heavily on connecting people to existing programs and services in Ontario.** Yet, evidence is not provided supporting the effectiveness of these programs relative to poverty reduction, or if improvements or enhancements will be made to these programs to increase their effectiveness.

In the *Minister's message* at the beginning of the poverty reduction plan, you state that when you took the position of Minister, you were 'shocked to find case workers spending the majority of their time filing paperwork which was taking time away from assisting their clients'. **Minister Smith, what you should find even more shocking is the extreme poverty that recipients of social assistance in Ontario are living in.** In a country as wealthy as Canada, it is unacceptable and unjust that our social assistance rates are not based on the costs of living, and do not protect vulnerable citizens from living in dire situations without the money they need to buy food. Food insecurity is an urgent public health problem, and a serious human rights and social justice issue. ODPH is calling on decision makers, such as yourself, to address this issue using evidence-based policy measures; inaction will result in over 1.7 million Ontarians<sup>7</sup> remaining food insecure.

ODPH strongly urges the government of Ontario to consider the evidence-based recommendations in our [position statement](#) and the concerns we have brought forward regarding Ontario's 2020-2025 poverty reduction strategy. A truly effective poverty reduction strategy must ensure the most vulnerable households in Ontario have adequate income to afford basic costs of living, including enough healthy food on the table. ODPH would be pleased to have an opportunity to discuss further with you. Thank you for taking the time to review this information and we look forward to your response.

Sincerely,

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