

December 16, 2022

Re: Consultation on building a pan-Canadian school food policy

The Honourable Karina Gould
Minister of Families, Children and Social Development
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The Honourable Marie-Claude Bibeau
Minister of Agriculture and Agri-Food
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The Honourable Jean-Yves Duclos
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Dear Minister Gould, Minister Bibeau, and Minister Duclos,

Ontario Dietitians in Public Health (ODPH) is the independent and official voice of Registered Dietitians (RDs) working in Ontario's public health system. ODPH is pleased to have the opportunity to inform the Government of Canada's process to build a School Food Policy. We are supportive of the efforts to develop this policy and a nutritious meal program with the following considerations and recommendations.

ODPH recognizes household food insecurity as an income-driven problem requiring income-based solutions. Policies that improve the income of vulnerable households are urgently needed to effectively address food insecurity[1].

ODPH agrees with concerns raised in a recent open letter from Food Insecurity Policy Research (PROOF) that "universal, high-quality, and nutritious school food that fits community priorities is important in its own right, but that such programming cannot substitute for dedicated action on income adequacy"[2]. Furthermore, we share their concern that conflating a national school food policy with food insecurity reduction will negatively impact ongoing work at all levels of government on reducing household food insecurity by focusing on income redistribution policies.

There is no evidence that a school food program can alleviate poverty and household food insecurity [2] [3]. Despite this, the press releases, discussion paper and consultation questions have framed school food programs as solutions to "reduce food insecurity and hunger". This framing fails to realize the very real financial hardship and

material deprivation faced by students and their families experiencing food insecurity that impedes academic achievement and health and well-being.

We also wish to express caution about other language in the consultation document and survey that implies that initial funding may be targeted to programs for “children who need school food the most”. As noted in the consultation discussion document, data from the 2017 Canadian Community Health Survey indicate that over 70% of all Canadian children would benefit from improved access to more nutritious food. Any programs that attempt to reach specific more disadvantaged children and families will not only result in shame and stigma, but it will also fail to reach the expectations of improving academic achievement and child health and well-being [4] [5]. A universally accessible program will reduce inequality, build social connectedness, promote healthy school food environments, support children to develop healthy life-long habits, and foster a sense of community.

While poverty and household food insecurity cannot be solved by school meals, school food programs have other benefits. School food programs can play a role in improving nutritional intake, supporting healthy growth and development, academic success, attendance, education attainment, mental health, and overall well-being [4]. In order to effectively do so, we recommend to:

- emphasize academic and nutritional benefit for all students, providing full meals that are culturally relevant, tasty and nutritious;
- ensure universally accessible programs rather than targeted ones to prevent stigma; programs need to be available and financially accessible to all;
- ensure the policy includes considerations for how school food programs can support improving food literacy including training and educational support for school staff so they can adopt age-appropriate food literacy education strategies and supportive food environments; and
- integrate hands-on food neutral learning opportunities to build practical skills, self-confidence, and make cross-curricular connections.

In addition, ODPH believes that to be fully realized, a national school meal program should be:

- sustainably funded by the federal government along with continued provincial, territorial, municipal, and community funding to expand existing and initiate new programs;
- flexible and locally adapted to reflect the local context of the school and region
- informed by existing programs and relationships between students and their families, as well as support a variety of food service models (breakfast, lunch, before and during the school day);
- committed to Indigenous autonomy and food sovereignty of programs for Indigenous students;
- connected to community economic development by using local and sustainably produced foods, creating jobs for Canadian farmers and food producers as well a

- staff to implement the programs in schools;
- supported by guidance, accountability measures, and an evaluation framework including national nutritional standards and safeguards to prevent programs from marketing unhealthy/ultra-processed foods and specific products to children and youth;
- equipped with a combination of commercial-compliant school facilities and partnerships with off-site community commercial-standard kitchens, food hubs, and distribution systems to ensure efficient supply, preparation, and delivery of school meals.

Thank you for the opportunity to contribute to this discussion and we look forward to the development and implementation of a Pan-Canadian National School Food Policy.

Sincerely,



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CC:

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References

- 1 Ontario Dietitians in Public Health. December 2020. Position Statement and Recommendations on Responses to Food Insecurity. <https://www.odph.ca/odph-position-statement-on-responses-to-food-insecurity-1>
2. PROOF. December 9, 2022. Open Letter: Stop headlining the pan-Canadian school food policy as a way to reduce food insecurity among children. <https://proof.utoronto.ca/resource/open-letter-on-school-food-policy-consultation/>

3. Alberta Health Services (2021) School Meal and Snack Programs: A review of the effectiveness of school meal and snack programs on household food insecurity, learning and health. Nutrition Services, Population and Public Health, Calgary , Alberta, Canada <https://www.albertahealthservices.ca/assets/info/nutrition/if-nfs-pph-evrev-fullreport-school-meal-snack-programs.pdf>
4. Coalition for Healthy School Food <https://www.healthyschoolfood.ca/the-evidence>
5. Single Mothers Alliance (2022) A Universal School Food System for BC, SMA Research and Policy Brief, other reference: [Research and Policy Brief on Universal School Food for BC](#).