

October 19, 2023

The Honourable Sylvia Jones  
Minister of Health  
Ministry of Health  
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Dear Minister Jones,

**Re: Ontario Drug Benefits Program for Infants and Children with a Medical Diagnosis\* Requiring Strict Avoidance of Standard Soy and Milk Proteins**

Ontario Dietitians in Public Health and Food Allergy Canada are writing to you to recommend that specialized infant formula be covered through the Ontario Drug Benefit Program (ODB) for infants and children 0-24 months of age with a medical diagnosis\* requiring the strict avoidance of standard soy and milk proteins.

The current infant formula shortage over the past 17 months has reinforced the necessity of access to infant formula. However, less recognized is the significant cost barrier faced by those Ontarians who require specialty formulas, an issue that existed long before the shortage.

The ODB program does not currently cover the cost of specialty infant formulas medically required by infants and children 0-24 months of age who need to avoid standard soy and milk proteins. Without this coverage, an estimated 5,125 infants and children each year in Ontario may be unable to meet their nutrient needs. Due to the high cost of these specialty formulas, families may be unable to afford the only infant formula option medically required to meet the nutrient requirements of these infants and children.

Early childhood malnutrition presents a considerable burden to the health care system in Ontario. Alternatives to the current situation exist and are proposed in the attached Call to Action.

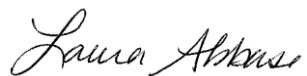
**We recommend that the Government of Ontario support and optimize infant and child growth and development, reduce health inequities, and help the sustainability of Ontario's health care system by:**

- **Expanding coverage for specialized infant formulas through the Ontario Drug Benefit Program; and**

- Ensuring infants and children 0-24 months of age who are partially breastfed or non-breastfed with a medical diagnosis\* requiring the strict avoidance of standard soy and milk proteins qualify for this coverage.

Thank you for considering these important recommendations. We welcome the opportunity to discuss these recommendations and look forward to a consultation.

Sincerely,



Laura Abbasi, RD, MHSC  
Ontario Dietitians in Public Health



Jennifer Gerdt, Executive Director  
Food Allergy Canada

\*Medical diagnosis can include an IgE mediated food allergy and/or a non-IgE mediated food allergy, such as food protein-induced enterocolitis syndrome (FPIES), food protein-induced enteropathy (FPE), allergic proctocolitis (AP), eosinophilic esophagitis (EoE) and several others. Due to the variability in clinical presentation and lack of validated diagnostic tests, a diagnosis relies on a detailed medical history, physical examination and a trial elimination of the suspected food allergen.

Cc

Dr. Catherine Zahn, Deputy Minister of Health

Angie Wong, Drug Programs Policy and Strategy Branch (Health)

Dr. Kieran Moore, Chief Medical Officer of Health, Office of Chief Medical Officer of Health, Public Health

Chris Dacunha, Executive Director, Policy, Minister's Office (Health)

Alex Millier, Director, Stakeholders & Member Relations, Minister's Office (Health)

France G  linas, Health Critic, New Democratic Party of Ontario

Dr. Adil Shamji, Critic for Health, Northern Development, Indigenous Affairs and Colleges and Universities,  
Ontario Liberal Party

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**Ontario Dietitians in Public Health (ODPH)** is the independent and official voice of Registered Dietitians working in local public health units and provides leadership in public health nutrition. ODPH members apply evidence-informed nutrition information to enable healthy eating at every stage of life; advocate for and provide support to the creation of food policies and healthier eating environments; and implement and evaluate nutrition programs to improve the health of Ontario residents; and seek to remove barriers so that priority populations have equitable access and opportunities to reach their full health potential.

**Food Allergy Canada** is a national charity and the country's leading patient organization committed to educating, supporting, and advocating for the more than 3 million Canadians impacted by food allergy, including over 600,000 children. The organization focuses on improving daily quality of life by providing education and support needed to effectively navigate this medical condition, building informed and supportive communities, and acting as the national voice on key patient issues.