



Mental Health Commission of Canada  
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Via email: [mhccinfo@mentalhealthcommission.ca](mailto:mhccinfo@mentalhealthcommission.ca)

April 10, 2024

Re: Feedback on Mental Health and the High Cost of Living policy brief

Dear Katerina Kalenteridis, Nimesha Elanko, Catherine Willinsky, Mary Bartram, and expert reviewers

We are writing to you on behalf of [PROOF](#) and [Ontario Dietitians in Public Health \(ODPH\)](#) about your recent policy brief, *Mental Health and the High Cost of Living*, and our concerns with the presentation of food insecurity as a problem of inadequate food supply, solved through community-level responses.

PROOF is a research program at the University of Toronto studying the health implications of household food insecurity and effective policy interventions to address this serious public health problem. ODPH, the official voice of Registered Dietitians working in the Ontario public health system, provides leadership and expertise in public health nutrition practice, including food insecurity, family and child health, school health, and food systems.

We appreciate that your policy brief prominently featured the relationship between food insecurity and mental health and that it made use of quotes from the [commentary by PROOF researchers](#) in PHAC's journal and [PROOF's 2021 annual report](#). PROOF researchers have contributed to much of the literature on the association between food insecurity and poor mental health [across the life cycle](#) and the implications for [mental health care utilization](#) and [substance use](#) in Canada.

Food insecurity is tightly linked to poor mental health and increased mental health care use; evidence-based policy action to address food insecurity could help improve Canadians' mental health and reduce the burden on mental health care resources.

The policy brief comes at a critical time. PROOF's [most recent report](#) shows that food insecurity has reached a new record high in 2022, with 6.9 million Canadians living in a food-insecure household. The problem has garnered wide national attention and policymakers are looking for ways to address food insecurity.

We strongly agree with the importance of considering the mental health implications of broader economic and social policy reforms. However, we are deeply concerned by your policy recommendation for federal decision-makers to *"promote and invest in an adequate supply of more affordable, safe, high-quality, and nutritious foods for Canadians with low incomes and mental health concerns"*. This recommendation suggests that food insecurity is a problem of

inadequate food supply that can be solved through community-level responses. Not only is this not supported by evidence, but it also seriously distracts from the policies that matter most.

The root cause of food insecurity is the inadequacy of household incomes to meet basic needs. As highlighted in ODPH's [Position Statement on Responses to Food Insecurity](#), the kinds of policies recommended and reviewed in the Policy Landscape section do not address the drivers of food insecurity. Canada does not need policy approaches that [further perpetuate food-based responses](#). Instead, policymakers need to recognize that food insecurity is a highly sensitive indicator of financial hardship and pervasive material deprivation.

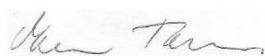
The policy interventions that matter for food insecurity are the ones outlined so thoroughly in the *Financial Insecurity* section — making sure that existing income supports align with the cost of living and are indexed to inflation, increasing minimum wage, and pursuing additional benefits and the prospect of a basic income. These recommendations align with those made by ODPH, [Dietitians of Canada](#), and other public health organizations, and are well-supported by PROOF's [policy evaluation research](#).

The brief could have reinforced the urgency for these recommendations to be implemented, had it acknowledged that they are the same ones needed to address the high rates of food insecurity. Instead, it reinforces the [misconception that food insecurity can be solved through further support of community food provision](#). It is more important than ever that advocates are aligned on key messaging and policy recommendations that are evidence-informed and income-based.

We welcome the opportunity to discuss why we feel these changes are important for more effective recommendations around food insecurity, as well as the research on food insecurity and mental health.

Thank you for taking the time to review this letter, and we look forward to your response.

Sincerely,



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Professor Emeritus, University of Toronto



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