



Ontario Society of Nutrition  
Professionals in Public Health

La société ontarienne des professionnel(le)s  
de la nutrition en santé publique

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March 7, 2016

The Honourable Bill Morneau  
Minister of Finance  
Department of Finance Canada  
90 Elgin Street  
Ottawa, Ontario K1A 0G5

Dear Honourable Bill Morneau

On behalf of the Ontario Society of Nutrition Professionals in Public Health (OSNPPH), we are writing to share our concerns about the recently launched National Zero Waste Council's campaign. The Council is garnering support for the creation of federal tax credits for food industry donations to charitable food programs. OSNPPH strongly urges the federal government to reject this tax credit proposal.

Food insecurity – inadequate or insecure access to food because of financial constraints – is a serious social and public health problem. In Ontario, 12.5% of households, or over 1.5 million Ontarians, report food insecurity<sup>i</sup>. In Canada, 4 million individuals, including 1.15 million children, experience food insecurity<sup>ii</sup>. In 2015 Food Banks Canada Annual Hunger Count reported approximately 850,000 Canadians using food banks.<sup>iii</sup> Clearly, a large percentage of Canadians who are food insecure do not use food charity. Community-based food charity, specifically food banks, is the primary response to household food insecurity but evidence shows that food banks do not reduce food insecurity.

OSNPPH's recently released [Position Statement on Responses to Food Insecurity](#) notes that food insecurity is an urgent human rights and social justice issue for local, provincial and federal public policy agendas. As stated in the Position Statement, food charity is an ineffective and counterproductive response to food insecurity because it does not address the root cause which is poverty. Food banking has grown and evolved into an extensive charity-based secondary food distribution system specifically for impoverished people. The growth of food charity has been linked to a reduction in social programs, as governments abandon previously held responsibilities for the well-being of citizens and instead rely on community-based charities to fill the gap.

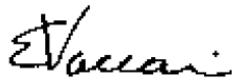
Corporate donations may result in food banks having to distribute or dispose of unsaleable foods. Moving forward with corporate tax credits for donations to the food bank system will incentivise the donation of unsaleable products. We recognize that there is a pressing need to address food waste in Canada. However, pushing more unsaleable products to food banks is not an effective response from a health, food safety or public policy viewpoint. Several of the 2015 Liberal election promises, once implemented, will increase equity for all Canadians. With increasing income equity, there will be less need for food banks. Therefore, any food waste strategy focusing on donations to food banks will soon be outdated.

The Zero Waste Council's online [FAQ](#) states that "Critics of tax incentives argue that the current system of charitable food donations and support offered by businesses does not combat hunger, and that it is better to invest in poverty reduction, the root cause of hunger. This is arguable." It is OSNPPH's position that this is not arguable. Extensive evidence indicates that governments should focus their efforts and policies on addressing adequate income for people who are living in poverty and experiencing food insecurity. Reducing food insecurity cannot be met with measures to reduce food waste.

OSNPPH is the independent and official voice of over 200 Registered Dietitians working in Ontario's public health system. OSNPPH provides leadership in public health nutrition by promoting and supporting evidence-based nutrition information to enable healthy eating at every stage of life. This is done through advocacy, supporting the creation of healthier eating environments, and implementing nutrition education and skill building programs.

To discuss this further, please contact Lyndsay Davidson: [lyndsayd@chatham-kent.ca](mailto:lyndsayd@chatham-kent.ca) or 519-352-7270, ext 2478.

Sincerely,



Evelyn Vaccari, RD  
Co-chair, OSNPPH



Lyndsay Davidson, RD  
Co-chair, OSNPPH Food Security Workgroup

cc:

Right Honourable Justin Trudeau, Prime Minister  
Hon. Jane Philpott, Minister of Health  
Hon. Lawrence MacAulay, Minister of Agriculture and Agri-Food  
Hon. Catherine McKenna, Minister of Environment and Climate Change  
Mike Layton, Co-lead, National Zero Waste Council  
Pat Vanderkooy, Dietitians of Canada  
Phil Groff, Executive Director, Sustain Ontario  
Diana Bronson, Executive Director, Food Secure Canada  
Dr. Kate Parizeau, Waste Research Group, University of Guelph

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<sup>i</sup> Tarasuk, V, Mitchell, A, Dachner, N. (2015). Household food insecurity in Canada, 2013. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from <http://nutritionalsciences.lamp.utoronto.ca/>

<sup>ii</sup> Tarasuk, V, Mitchell, A, Dachner, N. (2014). Household food insecurity in Canada, 2012. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from <http://nutritionalsciences.lamp.utoronto.ca/>

<sup>iii</sup> [https://www.foodbankscanada.ca/getmedia/01e662ba-f1d7-419d-b40c-bcc71a9f943c/HungerCount2015\\_singles.pdf.aspx](https://www.foodbankscanada.ca/getmedia/01e662ba-f1d7-419d-b40c-bcc71a9f943c/HungerCount2015_singles.pdf.aspx)