

May 31, 2017

Poverty Reduction Strategy Office
Ferguson Block 6th Flr
77 Wellesley St W
Toronto, ON M7A 2T5
Via email: PRSO@Ontario.ca

Re: Ontario's Food Security Strategy

The Ontario Society of Nutrition Professionals in Public Health (OSNPPH) congratulates the Poverty Reduction Strategy Office for launching important initiatives that have potential to significantly impact the lives of Ontarians living in poverty. We are writing to offer comments on [Building Ontario's First Food Security Strategy – Discussion paper](#).

OSNPPH is the independent and official voice of Registered Dietitians working in Ontario's public health system. OSNPPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents.

OSNPPH is concerned about a lack of clear focus for the Food Security Strategy. The four focus areas delineated in the Discussion paper conflate issues related to community food security and food systems (i.e., empowered communities, integrated food initiatives, innovation) with household food insecurity – insecure or inadequate access to food due to financial constraints. While supporting healthy eating and enhancing food systems are appropriate objectives for a Food Security Strategy, evidence indicates that actions in these areas will not impact on reducing the prevalence of household food insecurity (HFI) in Ontario, identified as the immediate focus for the Strategy.

Evidence gathered by PROOFⁱ shows that HFI is not a food-based problem and cannot be impacted by food system enhancements or food access interventions at the community level. HFI is strongly correlated with low income; provincial and federal interventions to improve financial security are the only responses that have proven efficacious at significantly reducing its prevalence. Income-based responses to HFI will not differ across regional or cultural communities and a collective impact approach to the problem of HFI is impractical.

OSNPPH's [Position Statement on Responses to Food Insecurity](#)ⁱⁱ recommends investigation of a basic income guarantee to effectively address household food insecurity. This recommendation was based on research demonstrating a 50% decline in HFI among low-income seniors when they reach the age of 65 and become eligible for the Old Age Security pension and Guaranteed Income Supplement – a type of basic income.ⁱⁱⁱ OSNPPH applauds the recent announcement of the Ontario Basic Income Pilot, representing a pivotal step forward, but will affect very few Ontarians living in poverty over the next three years while the pilot is being implemented and evaluated. As well, yesterday's announcement regarding increases to the minimum wage will also improve people's chances of being able to afford a healthy diet.

Social assistance reform is needed immediately to address the high prevalence of food insecurity among Ontario Works and Ontario Disability Support Program recipients. Social assistance rates that reflect actual costs of basic living across Ontario could be determined through the establishment of a Social Assistance Research Commission as recommended in Bill 6^{iv}, ordered to the Standing Committee on Social Policy in September 2016, but has yet to be heard by the Committee. The effectiveness of social assistance reforms on reducing food insecurity prevalence by almost 50% was demonstrated in Newfoundland and Labrador between 2007 and 2011.^v

In their position statement and recommendations for addressing household food insecurity^{vi}, Dietitians of Canada suggests a multi-pronged approach including different income-based strategies. These include: improved protection for precarious employment and low wages, improved benefits for low income households, increased social assistance and disability pension rates, investigation of a basic income guarantee, more investment in subsidized and affordable housing, and actions to address high cost of food in northern and remote regions.

OSNPPH was disappointed to recently learn that Ontario was one of three provinces/territories that did not measure HFI in the 2015/2016 cycle of the Canadian Community Health Survey (CHHS). This was the first time since the Household Food Security Survey Module^{vii} was added to the Canadian Community Health Survey in 2005 that Ontario has not measured HFI. This interruption in measurement will cause an information gap for evaluating policy interventions, such as the Basic Income Pilot and the Food Security Strategy, as well as monitoring the problem of HFI in Ontario and nationally given the substantial number of food insecure households in Ontario. A recommendation to Health Canada and Statistics Canada that the HFSSM become core content for the CCHS will be put forth by OSNPPH since this is the only mechanism for monitoring HFI.

The highest priority for Ontario's Food Security Strategy should be to make a strong impact on reducing the unacceptable level of HFI among Ontarians. This can be achieved through targeted policy interventions to reduce poverty.

Sincerely,



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OSNPPH Co-Chair Year 2



Mary Ellen Prange, RD
OSNPPH Food Security Workgroup Co-Chair

cc.

Linda Stewart, Executive Director, Association of Local Public Health Agencies
Dr. Penny Sutcliffe, Chair, Council of Ontario Medical Officers of Health
Pegeen Walsh, Executive Director, Ontario Public Health Association
Naomi Dachner, PROOF Food Insecurity Policy Research, University of Toronto
Pat Vanderkooy, Public Affairs Manager, Dietitians of Canada

References:

- ⁱ PROOF Food Insecurity Policy Research. <http://proof.utoronto.ca/>
- ⁱⁱ Ontario Society of Nutrition Professionals in Public Health. Position Statement on Responses to Food Insecurity. November 2015. <https://www.osnp-ph.on.ca/upload/membership/document/2016-02/position-statement-2015-final.pdf>
- ⁱⁱⁱ Emery JCH, Fleisch VC, McIntyre L. How a guaranteed annual income could put food banks out of business. University of Calgary School of Public Policy Research Papers. December 2013; 6(37). <https://www.policyschool.ca/wp-content/uploads/2016/03/emery-foodbankfinal.pdf>
- ^{iv} Legislative Assembly of Ontario. Bill 6, Ministry of Community and Social Services Amendment Act (Social Assistance Research Commission), 2016. http://www.ontla.on.ca/web/bills/bills_detail.do?locale=en&Intranet=&BillID=4117
- ^v Loopstra R, Dachner N and Tarasuk V. An exploration of the unprecedented decline in the prevalence of household food insecurity in Newfoundland and Labrador, 2007 – 2012. Canadian Public Policy, September 2015, 191-2016. Doi: 10.3138/cpp.2014-080
- ^{vi} Dietitians of Canada. Addressing Household Food Insecurity in Canada – Position Statement and Recommendations from Dietitians of Canada, May 2016 <https://www.dietitians.ca/Downloads/Public/HFI-Position-Statement-and-Recommendations-DC-FINA.aspx>
- ^{vii} Health Canada. The Household Food Security Survey Module (HFSSM). Updated July 25, 2012. <http://www.hc-sc.gc.ca/fn-an/surveill/nutrition/commun/insecurit/hfssm-mesam-eng.php>