

May 31, 2017

Poverty Reduction Strategy Office
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Via e-mail: PRSO@Ontario.ca

Re: Ontario's Food Security Strategy

Peterborough Public Health (PPH) 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](#).

While supporting healthy eating and enhancing food systems are appropriate objectives for a Food Security Strategy, evidence indicates that actions in **these areas alone** will not reduce the prevalence of household food insecurity (HFI) in Ontario, identified as the immediate focus for the Strategy.

Food Security is About Income Security

Evidence gathered by [PROOF: Food Insecurity Policy Research Program](#) shows that household food insecurity (HFI) is not a food-based problem and cannot be impacted by food system enhancements or food access interventions at the community level.¹ HFI is strongly correlated with low income; therefore making provincial and federal interventions to improve financial security the only responses that have proven efficacy to significantly reduce 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. We would propose that if there is a strong and coordinated government led effort to address income and housing security as a foundation, a community-led intervention to address food literacy, food access and inclusion can be successfully added as a complementary approach to build synergy and success.

The PPH Board of Health has supported resolutions related to the need for basic income guarantees. They also endorsed the Ontario Society of Nutrition Professionals in Public Health's Position Statement on Responses to Food Insecurity that recommends investigation of a basic income guarantee to effectively address household food insecurity.² 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.³ PPH applauds the recent announcement of the Ontario Basic Income Pilot, representing a pivotal step forward, but we also recognize that interim measures must be taken over the next three years while the pilot is being implemented and evaluated.

Social assistance reform is needed immediately to address the high prevalence of food insecurity among Ontario Works and Ontario Disability Support Program recipients. PPH has requested updates on Social Assistance Reform and have also expressed our support for [Bill 6: An Act to amend the Ministry of Community and Social Services Act to establish the Social Assistance Research Commission](#) that if passed, would provide a

means to reflect actual costs of basic living across Ontario. The effectiveness of social assistance reforms on reducing food insecurity prevalence by almost 50% was demonstrated in Newfoundland and Labrador between 2007 and 2011.⁴

Community-led Programs and Responses to Food Security

PPH has worked closely with local organizations, citizens, municipal and provincial government on community food security and poverty reduction over the last 30 years. As Medical Officer of Health, I chair the Peterborough Food Action Network (PFAN), a working group of the Peterborough Poverty Reduction Network. We focus our work on a food security continuum that addresses short-term relief, capacity building and the important work of broader system change. Through both PFAN and as individual agencies, our community has developed food program responses, advocated for policy change and supported the need for new approaches to income solutions including social assistance reform and basic income. As outlined in the Discussion Paper: Building Ontario's First Food Security Strategy, Peterborough is an empowered community working together collectively with innovative initiatives, yet calculations based on the Canadian Community Health Survey for the PPH area shows that 16.5% of households are food insecure.⁵

As a practical example, a PPH-led Community Food Security Partnership Project which began in 2006 with provincial government funding, resulted in key programs, determined by existing evidence at that time, agency input and community member engagement with an emphasis on the social determinants of health. One program that evolved through this initiative led by PPH, *Come Cook With Us*, still continues with Board of Health resources. Although it began as a food security initiative, it is now framed as a food literacy program for vulnerable/priority populations. The one difference is that the program offers grocery store vouchers for participants to enable them to purchase ingredients for home preparation, hence addressing income insecurity at the same time.

We know through the annual assessment of the Ontario Public Health Standards Nutritious Food Basket Protocol that food costs locally have increased by 22% over the last 6 years.⁶ By providing a voucher with our food literacy programs, we address one of the critical contributors to household food insecurity: poverty. Other barriers like the cost of transportation or the access to childcare that prevent the most food insecure clients from engaging in programs and services that can assist with food literacy, are also deliberately addressed in our programs. These all come at a cost and so sustainable funding to support programming for vulnerable populations is critical in order to not only offer opportunities, but to also address barriers to participation. The strategic use of food vouchers and farmer's market vouchers could be part of a provincial food security strategy that provides income relief to both the suppliers and purchasers of nutritious food.

As an organization, our local public health agency has shifted internal resources to support other proven community-based initiatives that support improved access to food. As an example, one of our Registered Dietitians has taken on the ordering function of the local JustFood Program (good food box program) on top of our commitment to supporting education and bi-monthly packing and distribution of food boxes to the community. Another works with Food For Kids Peterborough and County community partnership that has supported Student Nutrition Programs in local elementary and secondary schools for over 20 years. Dedicated volunteers provide healthy breakfasts and help to ensure that all students are able to attend classes well-nourished and ready to learn to their full potential. **Universal school nutrition programs** are an important intervention to address child food insecurity in a non-stigmatizing way that has other benefits, such as improved learning and behaviour in the classroom. **We would encourage the province to find ways to support universality.** We appreciate the ongoing financial support of the Ministry of Children and Youth

Services but sustainability of programs relies on community donors and volunteers. **We ask that as part of the Ontario Food Security Strategy, the province seeks partnerships with the federal government to make Student Nutrition Programs a fully funded program.**

PPH has supported connections between local farms and schools. With a small grant from the Greenbelt Foundation, we were able to deliver local food boxes to Student Nutrition Programs and pilot Farm to School presentations. There are plans through our local Healthy Kids Community Challenge to further connections to local farmers through a school-based “Thank a Local Farmer” campaign as part of our Local Food Month and Theme 3 “Choose to Boost Veggies and Fruits”. Building on these school programs, including Student Nutrition Programs is an important way to engage local growers and create dependable and significant markets for farmers. **We would recommend this as a component of a provincial food security strategy.**

We are also committed as a member of the collaborative project, “Nourish” that aims to grow a communal sense of belonging by eating, cooking, growing and advocating for healthy food in the context of more inclusive communities.⁷ As Minister Ballard heard when he met with us prior to the community roundtable, food is a powerful community development tool, if it is prepared and shared in an inclusive way that promotes dignity.

From our first-hand experience in leading, partnering and supporting food programs, we are clearly aware that addressing income is critical to impact household food insecurity. While programs can support improved diet quality of the participant and increase food literacy (i.e., food skills, nutrition knowledge, food safety, social inclusion) they are not enough to reduce health inequities. If supporting food initiatives in empowered communities across Ontario becomes a key focus of the Ontario Food Security Strategy, it is critical to ensure that these initiatives are linked to improving income and housing security and that they are funded so that they can be sustained. Local public health agencies across the province are well-positioned to support this type of community work that is focused on improving food security for all.

The Need for Surveillance and Measurement

We were 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 (CCHS). This was the first time since the Household Food Security Survey Module (HFSSM) was added to the CCHS 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. As public health professionals, PPH appreciates the necessity to measure and monitor as both a way to understand a problem, but also as a way to evaluate one’s success. **We would hope that Ontario will reconsider its decision regarding the CCHS.** A recommendation to Health Canada and Statistics Canada that the HFSSM become core content for the CCHS will be put forth by the Ontario Society of Nutrition Professionals in Public Health since this is the only mechanism currently available to us for monitoring HFI.

Public health in Ontario is currently undergoing a modernization of its mandate. For close to ten years, every board of health has been assessing the local cost of food on an annual basis using the Nutritious Food Basket Protocol and Guidance Document to ensure consistent data collection methodology and implementation. The cost of a “Nutritious Food Basket” has been used in Peterborough to identify the inadequacies of social assistance and the provincial minimum wage to provide individuals and families with sufficient income with which to purchase healthy food. It is an important advocacy tool that the Board of Health receives yearly and

is utilized as local evidence by many community partners. We are concerned that a draft of our proposed programs scheduled to begin in 2018 does not specifically reference this important protocol and we would urge your government to maintain this within our mandate. The contribution that consistent and reliable food costing data make to equity focused public health practice is too important to lose.

As part of surveillance and measurement, set indicators, relevant to both food security as well as nutrition strategies, that can be used locally and then rolled up to produce provincial results that would be beneficial in measuring impact and success of a provincial Food Security Strategy.

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. Your continued focus on achieving the goals of the provincial poverty reduction plan will be the best guarantee that food security in Ontario is strengthened.

Sincerely,

Original signed by

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Medical Officer of Health

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References:

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