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Community Health Nurses'
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Ontario Association of Public
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Ontario Society of Nutrition
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Minister Chris Ballard

Minister Responsible for the Poverty Reduction Strategy

Poverty Reduction Strategy Office

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May 31, 2017

RE: Ontario's First Food Security Strategy

Dear Minister Ballard,

On behalf of the Ontario Public Health Association (OPHA), which houses the Nutrition Resource Centre, I am writing to provide recommendations in support of the Ontario Government's commitment to a provincial Food Security Strategy. As an organization that recognizes the critical connection between income, food insecurity, and health, we are pleased to see that a Food Security Strategy is being proposed as part of Ontario's Poverty Reduction Strategy.

Household food insecurity is costly to the healthcare system. Through the work of V. Tarasuk and colleagues¹, it has been established that food insecure households have higher healthcare utilization costs, independent of other determinants¹. OPHA supports the notion that a comprehensive food security strategy will supplement health promotion and protection initiatives in public health, as we work together to reduce the burden of illness on the province of Ontario.

The provincial government is well poised to ensure a coordinated system level strategy that reaches beyond local charitable initiatives that respond to the effects of food insecurity². Community initiatives such as local foodbanks are important coping mechanisms for people experiencing immediate food insecurity, though they are not a long term solution. OPHA takes the position that a whole-of-government approach that aims to improve the socio-economic climate that impacts food security in Ontario is necessary. By examining the

government's role in policy that can address the causes of food insecurity, the prevalence of food insecurity is better tackled in an upstream capacity.

Thus, we urge the government to consider its role in a system-level approach to achieving food security by ensuring that strategies are cross-sectoral and cross-ministerial as outlined in the [Ontario Food and Nutrition Strategy](#)³, a collaborative plan developed by over 20 health, food and agricultural non-profit organizations. Theme three of the discussion paper, "Food Security is About More than Food", should be prioritized as the core element of *Ontario's First Food Security Strategy*. This would ensure that essential requirements for food security such as income, housing, and access to food, etc. are focused on. The other three themes on empowered communities, integrated initiatives, and innovation, are more supportive elements.

In response to your ministry's call for feedback, OPHA makes the following seven recommendations. Through these overarching considerations, it is our aim to address the most pressing question put forward in the discussion paper *Building Ontario's First Food Security Strategy* by answering "what role can governments play in improving food security?" with actionable recommendations. These recommendations are as follows and are further elaborated upon in the attached **Appendix**:

Recommendation 1: Revise the definition of food security and define food insecurity within Ontario's Food Security Strategy.

Recommendation 2: Continue support for moving towards a basic income and develop strategies to mitigate vulnerabilities that arise from precarious employment trends.

Recommendation 3: Ensure that fiscal policies prioritize access to healthy foods for health promotion and protection in the environments where we live, work, learn, play and age.

Recommendation 4: Establish an advisory committee for the development and implementation of the Food Security Strategy.

Recommendation 5: Include valid and reliable key indicators that will describe the problem of food insecurity in Ontario and evaluate the strategy.

Recommendation 6: Prioritize the importance of robust data collection at the public health unit level through the Nutritious Food Basket survey tool.

Recommendation 7: Promote innovative solutions that target northern food systems.

We are hopeful that our recommendations will encourage the Ontario Government in its endeavour, and foster support for a collaborative approach. Engaging multiple ministries at multiple levels to ensure the necessary policies, supports, and resources are in place, as well as involving public health and community partners in a participatory evaluation framework, will help to ensure that cross-sectoral factors impacting food security are measured and accounted for. Ontario's Food Security Strategy should aim for measured outcomes showing a decrease in the number of food insecure people in Ontario.

OPHA and its Constituent Societies, workgroups, and the Nutrition Resource Centre have much expertise to offer and would welcome the opportunity to collaborate with others to provide any needed supports in the development and implementation of a comprehensive food security strategy. As an example, OPHA was a leading partner in the creation of Ontario's Food and Nutrition Strategy mentioned earlier. By partnering collectively with a dedicated group of key actors in Ontario's food and nutrition systems, a comprehensive evidence informed plan is [available](#) to advise the province of Ontario on healthy food and food systems. Our organization also provides training and educational resources on topics ranging from healthy eating, food literacy and skills, health equity, and evidence informed food and nutrition strategies.

Given our expertise and commitment to promoting the health and wellbeing of Ontarians, we look forward to sharing our resources and networks to help shape Ontario's First Food Security Strategy. Thank you for your consideration.

Yours sincerely,



Pegeen Walsh

About OPHA

Created in 1949, the Ontario Public Health Association (OPHA) is a non-partisan, non-profit organization that brings together a broad spectrum of groups and individuals concerned about people's health. OPHA's members come from various backgrounds and sectors— from the various disciplines in public health, health care, academic, non-profit to the private sector. They are united by OPHA's mission of providing leadership on issues affecting the public's health and strengthening the impact of people active in public and community health throughout Ontario. This mission is achieved through professional development, information and analysis on issues effecting community and public health, access to multidisciplinary networks, advocacy on health public policy and the provision of expertise and consultation.

Appendix: Detailed Recommendations for Ontario’s Food Security Strategy

In response to the Ministry’s call for feedback, OPHA makes the following seven recommendations.

Recommendation 1: Revise the definition of food security and define household food insecurity within Ontario’s Food Security Strategy.

In the government’s discussion paper *Building Ontario’s First Food Security Strategy*, food security is described as being “achieved when people have access to sufficient, safe, nutritious, and culturally appropriate food that meets their dietary needs”. OPHA is encouraged to see important concepts of food security included in the definition, however we recommend that the definition strive to better reflect the multifaceted nature of food security by incorporating additional key concepts. It is important to carefully define food security, as the definition provides a framework for the Food Security Strategy—identifying essential outcomes that the program aspires to achieve in order to increase food security in Ontario.

Drawing on the Five A’s Framework of Food Security⁴ we stress the importance of reflecting each of the Five A’s in the definition, which includes: availability, accessibility, adequacy, acceptability and agency. A definition that captures the 5 A’s embeds core societal values, such as equity, sustainability, social justice, and Canada’s commitment to food as a basic human right⁵.

For example, the Food and Agriculture Organization of the United Nations provides the following comprehensive definitions which clearly reflect aspects of food security that are built on the core values of a society.

*“A situation that exists when **all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food** that meets their **dietary needs and food preferences** for an active and healthy life.”⁶*

*“Realizing the right [to food] requires ‘the **availability of food in a quantity and quality sufficient** to satisfy the dietary needs of individuals, **free from adverse substances, and acceptable within a given culture**; the **accessibility of such food in ways that are sustainable** and that **do not interfere with the enjoyment of other human rights**’.”⁷*

Constructs that refer to “all people at all times”⁶ reflect equity, social justice and a rights-based approach to achieving food security; highlighting the government’s role in ensuring that all Ontarians are free of hunger and have the opportunity to produce or procure food in ways that are consistent with their human dignity. Within the 5 A’s framework⁴, OPHA recognizes the government as agency and, as such, we commend the government for engaging in the development of a Food Security Strategy which will put in place processes and policies aimed at enabling all Ontarians to meet the basic right to food.

OPHA would like to further point out that the current definition being used in the discussion paper fails to include the concept of economic access to food. This is an important distinction to make in *Ontario’s Food Security Strategy* as Ontario, as a whole, is not a province lacking in food availability. Therefore, when discussing access to food, it is important to recognize aspects of food insecurity that by definition stem from socioeconomic disparities⁸ and position poverty as the root cause⁹. It is further recommended that household food insecurity be defined by the Government of Ontario within Ontario’s Food Security Strategy for clarity of terms and to reinforce the use of clear, common, evidence-informed language⁸. We recommend the following definition as derived from those included in the position statements on food insecurity by the Dietitians of Canada⁸ and the Ontario Society of Nutrition Professionals in Public Health⁹:

Household food insecurity is the inadequate or insecure access to food due to financial constraints. Its root cause is poverty⁹.

When considering access to food, it is important to understand the food environment and its role in either increasing or decreasing food security. A definition that recognizes the quality and healthfulness of food to which Ontarians have access is needed. Food insecurity can also occur when a food environment offers access to ample foods but of low nutrient value (also called a food swamp)¹⁰ or when there’s limited access to healthy nutritious foods (a food desert). The notion of food insecurity existing among an overabundance of unhealthy options is important for the Canadian context. A report by Health Canada reviewing literature on food environments found that there was stronger evidence to support the existence of food swamps in Canada, more so than for the existence of food deserts¹⁰.

Finally, OPHA is pleased to see the word “nutritious” included in this definition. We offer the additional recommendation that the words “for a healthy life” also be included to draw an explicit link to the importance of food security and access to nutritious foods as key factors for health promotion and chronic disease prevention.

With the above recommendations considered, we thus suggest the following revisions to the current definition of food security:

*Food security is achieved when **all** people have **physical, social and economic** access **at all times**, to sufficient, safe, nutritious, and culturally appropriate food that meets their dietary needs **for a healthy life** and that **do not interfere with the enjoyment of other human rights**.*

Recommendation 2: Continue support for moving towards a basic income and develop strategies to mitigate vulnerabilities that arise from precarious employment trends.

Research shows that household food insecurity is strongly correlated to income, and that policies to improve financial security are the most effective at addressing food insecurity rates¹¹. Poverty reduction initiatives, such as a basic income guarantee, are thus well suited to address household food insecurity as the most essential component of an overall poverty reduction strategy. OPHA has passed a resolution in support of basic income¹², and recently sent a joint letter with the Association of Local Public Health Agencies (alPHa) to Premier Wynne¹³ in support of the Ontario Government's launch of a basic income pilot. In a province that is abundant with local foods, agricultural infrastructure, and sophisticated food systems, it follows that food insecurity in Ontario occurs largely as a result of economic constraints and inequitable access².

Notably, the above recommended definition of food security also includes language around economic access. OPHA highlights this distinction and recommends that Ontario's food security strategy adopt an approach that positions household food insecurity as a concept that goes beyond community access to food. Thus, we ask for continued forward movement on a basic income in Ontario and support efforts to garner public and political will for a basic income as a measure to reduce food insecurity. We also believe that the basic income pilot may present an opportunity to measure household food insecurity and any changes thereof as a result of increased income.

OPHA also looks to the government to consider how multi-faceted strategies can work to address limited income, such as improved minimum wage, social assistance rates, and policy that addresses the effects of a growing trend towards precarious employment. Shifts in Canada's labour market have made it such that more and more Canadians are finding employment opportunities in the form of unsteady part-time or temporary work¹⁴. This trend is concerning as precarious employment renders the labour force more susceptible to income instability and more vulnerable to the effects of sudden loss of income¹⁵.

Recommendation 3: Ensure that fiscal policies prioritize access to healthy foods for health promotion and protection in the environments where we live, work, learn, play and age.

Policies and innovative funding programs that support sustainable farming practices and healthy food production are encouraged as part of the government's approach to a food security strategy. In addition, improved regulation of farming, fishing and food production practices will help to ensure that the food our communities enjoy are safe and nutritious³. Federal government initiatives, such as the Nutrition North Canada program¹⁶, are currently attempting to reduce disparities in costs for basic healthy food necessities through government subsidies. However, a report by the Auditor General highlighted skepticism in the program's ability to ensure that retailers receiving the subsidy are passing on the full subsidy to consumers¹⁷. Thus, while this program attempts to reduce cost disparities, if not properly instituted the program may be widening the gaps of inequity. As the federal government looks to improve the effectiveness and accountability of programs such as Nutrition North Canada, OPHA believes that Ontario's Food Security Strategy should look to work in ways that are complementary and ensure that healthier foods are attainable in households facing financial uncertainty.

OPHA emphasizes more can be done to reduce ongoing price inequities for basic healthy foods¹⁸. For households struggling to afford groceries, processed foods of high caloric density and low nutrient density are still a contending choice in many northern Ontario grocery stores. Moreover, the food environment literature substantiates that, in Canada, food swamps are a major issue contributing to food insecurity in urban settings, even in neighborhoods of higher socio-economic status¹⁰. Additionally, recognizing that the food environment can increase or decrease food insecurity, it is important to direct policies that increase access to affordable and nutritious foods within the environments where we live, work, learn, play, and age.

OPHA also recommends that the province move towards and retain policies and programs that increase access and the affordability of healthy foods for improved overall health and wellbeing. For example, Student Nutrition Programs have been funded by the Ontario Government to increase access to healthy foods in schools as part of the Poverty Reduction Strategy and Healthy Kids Strategy; the government also supports increasing access to healthy foods through the Northern Fruit and Vegetable program. These programs could be scaled up to ensure more children have equitable access to healthy foods at school. On the other hand, we invite the Ontario Government to consider how budgetary support for programs such as the newly announced Supermarket Recovery Program¹⁹ (a program that among its activities redistributes unsold supermarket foods to local foodbanks) will be able to offer food that is

safe, nutritious, and culturally appropriate. The idea that Ontario warrants a program to manage unwanted food items¹⁹ reinforces the idea that Ontario as a whole is not lacking in food availability within the food system. A better alternative would be to examine Ontario's food production and strive towards a more socially just food system that can implement more equitable access to Ontario's nutritious and culturally acceptable foods. OPHA fears that by endorsing programs such as a Supermarket Recovery Program, the Ontario government is perpetuating food waste. We are also concerned that creating new programs of this nature will lessen public and political will for the requirement of a food security strategy that recognizes the adequacy of food. The Five A's Framework, for example, stipulates that food should be "produced and obtained in ways that do not compromise people's dignity, self-respect, or human rights"²⁰.

Food insecure and low income households will be more sensitive to economic constraints that render healthy foods inaccessible. Policy approaches should consider the intersection of socioeconomic factors and equitable access to healthy foods for vulnerable populations, as healthy eating is a key factor for health and chronic disease prevention. We thus caution that charitable responses to the effects of food insecurity not be viewed as a solution in place of government action, but rather a short-term coping mechanism² that supplements sound supports for lowering the incidence of food insecurity.

Recommendation 4: Establish an advisory committee for the development and implementation of the Food Security Strategy.

Congruent to the notion of health in all policies, a whole-of-government approach is needed to reduce poverty and food insecurity. This requires the Ontario Government to build a food security strategy that involves policy across multiple ministries and looks to address the social determinants of health and reduce health inequities. As an example, income is a social determinant of health²¹. By examining political, economic, cultural and social contexts across ministries that interact with the social determinants of health, the Ontario Government can work towards eliminating unjust differences in health status²¹ and protect human rights to an equitable opportunity to health. This recommendation echoes Canada's commitment to the United Nations treaty on the right to food which positions food as a human right⁵.

Furthermore, OPHA suggests that the Ontario Government look to the example of Brazil, who has been the only country to successfully institute the right to food, meeting the millennium development goal to reduce hunger²². Brazil's success is largely attributable to a policy approach that recognizes the government's responsibility in instituting its citizens' right to food

as a human right across ministries; employs a participatory approach to governance; and integrates a collaborative systemic approach to food insecurity²².

To achieve this goal, we call on the Ontario government to establish an advisory committee including government representatives from different ministries, community stakeholders, and citizens to advise on the development and implementation of the Food Security Strategy.

Recommendation 5: Include valid and reliable key indicators that will describe the problem of food insecurity in Ontario and evaluate the strategy.

OPHA wishes to highlight the importance of locally driven data to ensure that provincial policy directions are informed by population data at the local level. Data on the prevalence and distribution of household food insecurity at the neighbourhood level as well as price inequities for nutritious foods will be important to inform and evaluate food security initiatives. In addition, an emphasis should be placed on obtaining data about food insecurity in Indigenous communities where fewer statistics currently exist.

As Dr. David Williams, Ontario's Chief Medical Officer of Health points out in his 2015 Annual Report *Mapping Wellness: Ontario's Route to Healthier Communities*²³, more granular population data at the local level is key to mapping the health of a community and identifying the distributive effects of current policy on vulnerable populations. In the case of a food security strategy, OPHA recommends employing a broad range of core indicators that will sufficiently describe the issue of food security and measure the various aspects by which it is defined. As an example, indicators that measure household food insecurity, the food environment, the cost of food, and other key determinants, such as housing costs and transportation systems will be important²⁴ as this information will contribute to developing evidence-informed policy and targeted interventions. Furthermore, OPHA strongly suggests regular monitoring and surveillance of key indicators to evaluate the impact of new policy directions and interventions. Government buy in and ongoing implementation of the strategy will be required beyond the current sitting government in order to have any impact on reducing food insecurity in Ontario in the long term.

At the provincial level, we would like to point out a gap in data that will exist as a result of recent changes in provincial data collection to monitor food insecurity. OPHA is concerned that this data gap will challenge the government's ability to develop evidence informed programming as well as measure any impact of the Ministry's planned food security strategy. In recent correspondence with the PROOF research team, we have learned that Ontario was one of three provinces/territories (along with Yukon and Newfoundland) that did not measure

household food insecurity for 2015-16 Canadian Community Health Survey - Household Food Security Survey Module (CCHS - HFSSM). This is the first time Ontario will experience a gap in food insecurity data since the food security module was added to the CCHS in 2005. We interpret this as potentiating a lack of data for the province of Ontario over a four year period, as we would have to wait until 2017-18 data is reported. A lack of data on the food insecurity status of Ontarians seriously undermines any monitoring and surveillance of food insecurity in Ontario.

Also concerning is the potential for the absence of data from Canada's most populous province to affect the national sample of data reporting on Canadian food insecurity in the CCHS. Thus, the government will not only lack provincial data, but will also lack a representative national estimate of household food insecurity. OPHA thus makes the strong recommendation for the HFSSM to become a core component of the CCHS to ensure that all provinces, including Ontario, will have reliable estimates of household food insecurity.

Recommendation 6: Prioritize the importance of robust data collection at the public health unit level through the Nutritious Food Basket survey tool.

As a food security strategy is being developed at the provincial level, OPHA urges the government to consider the importance of resource allocation for data collection being undertaken collaboratively by LHINs and public health units, and how this can help to inform policy on the needs of various communities. Historically, information gathered by public health units in Ontario, such as the cost of a Nutritious Food Basket²⁵, has been useful in identifying a local context for food security initiatives, for tracking inequities in the cost of food across the province, and for creating targeted and evidence informed interventions at the provincial and local level. This kind of data would support the government's proposed emphasis on local data as part of a provincial food security strategy. However, OPHA is apprehensive about the recent movement away from a prescriptive requirement for Boards of Health to implement the Nutritious Food Basket survey (under the 2017 modernized standards for public health). Our concern is that this trend conflicts with the policy direction of *Ontario's First Food Security Strategy* and may hinder the ability to detect in a standardized way disparities in costs of basic necessities. OPHA thus asks the Ontario Government to make provisions for the importance of cross-ministerial alignment to support a provincial food security strategy through robust data collection at the public health unit level, and strongly urges that the Nutritious Food Basket survey continue in a standardized manner.

Recommendation 7: Promote innovative solutions that target northern food systems.

In response to the discussion paper's theme four, *Driving Innovation*, OPHA is pleased to see a commitment to innovation, and recommends that the government look to drive innovative initiatives that will impact household food insecurity through improved food production and distribution systems, as well as infrastructure supports to accommodate dynamic and challenging environments.

For many communities in Northern Ontario, especially remote Indigenous communities, economic and physical access to healthy food is a barrier to food security³. For example, the cost of a Nutritious Food Basket is higher in remote areas of Northern Ontario when compared to Nutritious Food Basket costs in Southern Ontario²⁶. A recent Food Secure Canada report found that people living in remote Northern Ontario communities spend more than half of their income on food to meet basic nutritional need, compared to the provincial average of nine per cent¹⁸. By investing in infrastructure that introduces new efficiencies into the food system, the province can work to create more equitable pricing for nutritious foods, while at the same time stimulating economic activity and job creation³. OPHA thus makes the recommendation that Ontario's Food Security Strategy look to build innovative infrastructure that can meet the complex needs of northern food growing, transportation and distribution systems, which would help to lower costs of locally available healthy foods and encourage affordability³.

OPHA is encouraged to see the current government investing in Ontario agriculture and in particular encourages initiatives such as the *Northern Ontario Agriculture, Aquaculture and Food Processing Sector Strategy*²⁷. As a strategy that looks to develop targeted solutions for Northern Ontario, objectives under this strategy for job-development and growth in the aquatic and agri-food sectors in Northern Ontario can work to impact rates of household food insecurity that are more prevalent in Northern and Indigenous Communities²⁸. When considering resource allocation and funding to the agricultural sector in Ontario, investments such as those that can increase access to healthy foods in the North should be prioritized over current commitments to increase funding to the *Ontario Wine and Grape Strategy*²⁹, as an example.

Ontario's Food Security Strategy should include a focus on reducing health disparities among Northern Indigenous communities, where populations have been reported to experience food insecurity rates as high as 75%²⁸. Targeted and innovative solutions should be centred on establishing community food self-determination by planning food systems that are relevant to Indigenous culture and values²⁹. Innovations that work to develop interest and build capacity and resources for hunting, fishing, foraging and growing local foods will help to encourage self-sustainability and job creation, while programs running in parallel that import healthy foods should look to supplement a strong local food systems²⁸. Thus, when considering innovative

strategies, such as policies that can support local food production and self-reliant food systems, we call on the government to facilitate infrastructure for food councils to ensure that integrative initiatives are sensitive to regional differences and reflect local culture and self-determination.

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