

Ontario Public Health Association (OPHA)

Response to a Food Policy for Canada

September 30, 2017

We acknowledge the work of Ontario Dietitians in Public Health and Dietitians of Canada in preparing this response

A Food Policy for Canada

What is a food policy?

A Food Policy for Canada will set a long-term vision for the health, environmental, social, and economic goals related to food, while identifying actions we can take in the short-term.

A food policy is a way to address issues related to the production, processing, distribution, consumption and waste of food.

Minister's Mandate

"Develop a food policy that promotes healthy living and safe food by putting more healthy, high-quality food, produced by Canadian ranchers and farmers, on the tables of families across the country."

Minister of Agriculture and Agri-Food, Mandate Letter, 2015

Vision

Drawing on feedback from the June Summit and other regional engagement sessions, the following comprehensive vision statement has been proposed.

"The Canadian food system provides a sustainable food supply so that all people living in Canada, no matter where they live, have the ability to access a sufficient amount of safe, nutritious, and culturally-appropriate food, that in turn contributes to their health, and that of our environment and our economy."

Comments:

1. The food policy for Canada needs to reflect aspects of food security and it is good to see this in the proposed vision.

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.”¹*

*“**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’**.”²*

2. The vision should emphasize that what is good for people in terms of eating patterns and food choices will also be good for our environment, including our soil, water, and air – e.g. food produced, consumed and disposed of with the least impact on degrading our environment. The phrase “sustainable food supply” may need to be further articulated since there are many interpretations of what is meant by “sustainable”.

3. The vision should put Canadian foods in context - e.g. focus on Canadian foods, which will support Canadian farmers, fishers and producers – i.e. our national food policy should aim to increase demand and preference for Canadian foods.

Guiding Principles

A Food Policy for Canada will be built upon principles that reflect Canadian values. Guiding principles will be used to build a coordinated federal approach to food issues. The options presented below reflect participant feedback from the Food Policy Summit.

- **Inclusive:** considers the diverse interests and perspectives of Canadians
- **Participatory:** allowing all Canadians to be part of an ongoing dialogue, with a focus on community-based and –led initiatives, and capacity-building
- **Reconciliation:** respects and prioritizes reconciliation with Indigenous communities
- **Collaborative:** enables collaboration among governments and stakeholders
- **Results-oriented:** based on concrete actions with measurable goals
- **Evidence-based:** uses best available data, knowledge, and research.
- **Integrated:** recognizes links across themes/priorities
- **Policy coherence:** moving toward greater policy alignment and intergovernmental collaboration
- **Systems-based:** uses a systems-based approach (i.e., examines the linkages and interactions between the different elements of the food system) to address complex food issues
- **Adaptable:** able to evolve, responding to new issues and priorities
- **Innovative:** open to innovation, both technological and social

- Accountable:** with a clear governance structure(s)
- Transparent:** governance, decision-making, and monitoring and reporting

Comments:

All of these guiding principles are important for the development and implementation of A Food Policy for Canada, however, we feel the following are most critical:

Collaborative, Cooperative, Coordinated: A cross-government, multi-stakeholder approach requires collaboration among governments and stakeholders and cooperation among federal, provincial, territorial, and local governments; as well as with stakeholder organizations on food system issues. **There needs to be a governance system to ensure government is accountable and a lead group, such as a National Food Policy Council, with a Minister responsible, to ensure accountability.** This group would plan, implement and monitor policies and programs across government.³

Accountable: The food policy should have **clearly stated goals, achievable targets, and defined performance measures to deliver on the objective of improving the food system in Canada. There needs to a systematic approach to measurement, monitoring and analysis of key indicators in order to assess the impact of the national food policy.** Swinburne et al (2013), state that “the government’s monitoring and intelligence systems (surveillance, evaluation, research and reporting) should be comprehensive and regular enough to assess the status of food environments, population nutrition and diet-related non-communicable diseases and their inequalities, and to measure progress on achieving the goals of nutrition and health plans”.⁴

Integrated: The food policy must apply a “health in all policies” approach and link health, environmental, social, and economic goals to ensure federal food-related initiatives are effective and concentrate on an inclusive food system benefitting all Canadians. Integration, for example, is required to ensure synergies and non-competition between other government policies and priorities including Health Canada’s Healthy Eating Strategy, the national poverty reduction strategy and climate change strategies.

Evidence-based: The food policy must use the best available data, knowledge, and research and sufficient capacity be provided to do this work. For example, increase research on programs, policies, monitoring, evaluation and cost-benefit analyses on priority action areas, such as: food security, poverty reduction, healthy food access, food literacy and skills, local food production, processing and use, agricultural subsidies and pricing, and sustainable practices throughout the food systems. Support innovation across government and at all levels to develop and/or improve food and nutrition programs and policies. Facilitate knowledge exchange and capacity building in food systems planning and policy development.³

Themes and Priorities

The Government of Canada is asking Canadians for their views on how objectives should be prioritised for **short-term action** when it comes to the development of **A Food Policy for Canada**. These objectives have been grouped under **four themes**:

- Increasing access to affordable food
- Improving health and food safety
- Conserving our soil, water, and air
- Growing more high-quality food

Summary comments on themes:

To support the implementation of the Food Policy for Canada there needs to be a governance system to ensure government is accountable for outcomes of the strategy and a lead group, such as a national food policy council, with a Minister responsible, to ensure accountability. There needs to be a systematic approach to measurement, monitoring and analysis of key indicators in order to assess the impact of the national food policy.

The current status of eating patterns and the food environment will require substantial changes supported by a strong Food Policy for Canada to reduce the burden of diet-related disease and increasing health care costs and to ameliorate other social and economic costs to society and the well-being of the population. As such the Food Policy for Canada must be aligned with goals and objectives of Health Canada's Healthy Eating Strategy. A national food policy must mandate and promote access to healthy foods and healthy food environments for all people in Canada and address the needs of all population groups including pregnant women, infants, children and youth, adults and seniors, vulnerable people, Indigenous people and newcomers to Canada.

The national food policy should include:

- Income-based strategies, such as a basic income guarantee, to address household food insecurity;
- Improve access and affordability of food in Canada's northern communities, while strengthening regional food systems and building public support for programs that enhance access to traditional foods;
- Support breastfeeding, which is critical for an infant's health and wellbeing;
- Guarantee that everyone in Canada has secure access to safe drinking tap water at all times;
- Provide a universal national school nutrition program to increase access to healthy food for all children;
- Provide resources to increase food literacy in schools and in the community to promote healthy eating, encourage Canadian food choices and reduce food waste;
- Integrate policy to restrict unhealthy food and beverage marketing to children.

The national food policy should:

- Aim for sustainable stewardship of our land, water and air to ensure a food system that is good both for people and the planet;

- Support preserving agricultural land for food production and in particular more effective land use planning and saving class 1, 2 and 3 land from development;
- Support sustainable growing and production of health-promoting food (e.g. beans, legumes, vegetables, fruit);
- Support and incentivize prevention of wasted food by both the food industry/market sector and by consumers;
- Promote Canada's reputation as a preferred food supplier locally and globally.

The national food policy should:

- Re-design Canada's food systems for sustainability inclusive of social, environmental, and economic criteria;
- Encourage and support the development and maintenance of local and provincial food policy councils to reinforce the goals and objectives of the national food policy. The [Ontario Food and Nutrition Strategy](#) is a plan for healthy food and food systems and calls for a cross-government, coordinated approach to food policy development and implementation at the provincial level and can inform work done at the national level.

Theme 1. Increasing access to affordable food

Improving Canadians' access to affordable, nutritious, and safe food.

Not all Canadians have sufficient access to affordable, nutritious and safe food. We need to do more to improve the affordability and availability of food, particularly among more vulnerable groups, such as children, Canadians living in poverty, Indigenous peoples, and those in remote and Northern communities.

Proposed Objectives (from online survey):

- Ensuring that all Canadians can access nutritious food no matter where they live.
- Supporting the growth of local and regional food production.
- Making nutritious food more affordable for all Canadians.
- Working with partners to improve access to nutritious foods.

Comments:

Change the title of this pillar from, "Increasing access to affordable food" to, "Increasing access to nutritious and affordable food".

For many Canadians, food affordability is not the root of the problem, but rather that household incomes are not high enough to enable people to purchase nutritious food.⁵

Evidence gathered by PROOF⁶ shows that household food insecurity, inadequate or insecure access to food because of financial constraints, is strongly correlated with low income. For Canadians not living in northern Canada, increasing access to affordable food will not effectively address this serious issue.

- Household food insecurity is a serious social and public health problem that affected 4 million Canadians in 2012⁷ and is a potent predictor of poorer physical and mental health, independent of other well-established social determinants of health such as income and education.⁸

- Household food insecurity increases the risk of chronic and infectious diseases, and negatively impacts mental health and child development.^{9 10}

Federal investigation and implementation of income-based strategies, such as a basic income guarantee, are required to effectively address household food insecurity¹¹. This is based on research demonstrating a 50% decline in household food insecurity among low-income seniors when they reach the age of 65.¹²

In the absence of a basic income guarantee, social assistance reform is needed immediately to address the high prevalence of food insecurity among Canadians who rely on social assistance. Interventions to improve financial security are the only responses that have proven efficacious at significantly reducing the prevalence of household food insecurity.

Food charity, including the charitable donation of food waste, has not reduced the prevalence of household food insecurity.¹¹

The national food policy should improve access and affordability of food in Canada's northern communities, while strengthening their regional food systems and building public support for programs that enhance access to traditional foods. Only in the northern regions of Canada do we see such high food prices without corresponding income levels, and subsequently, high food insecurity rates. The cost of feeding a family in northern Canada is twice as much as the cost in the south despite the Nutrition North Canada subsidy program¹³. This structure for a Northern and remote food system is not currently meeting the needs of the population nor is it sustainable.

Household food insecurity, as measured by the Canadian Community Health Survey's Household Food Security Survey Module (CCHS HFSSM) should be used as an indicator in the national food policy. The national food policy should require that the CCHS HFSSM become a core module, whereby the provinces and territories are not able to opt-out. Regular monitoring of household food insecurity is crucial for population research and evidence-based policy decision making in Canada.

The Food Policy for Canada should include support for the establishment of a universal national school nutrition program. Children who eat a healthy diet are more ready to learn and more likely to be successful in school.¹⁴ A national school nutrition program can ensure all children achieve their full potential in school and have access to nutritious foods and beverages during the school day.¹⁵ Currently, Canada is the only G8 country that does not have a national school nutrition program.

Glossary:

Food access - Physical and economic availability of safe, healthy and culturally acceptable food, for all people at all times.¹⁶

Food security – Food security exists in a household when all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life. ¹⁷

Household food insecurity - Inadequate or insecure access to food because of financial constraints.¹⁸

2. Improving health and food safety

Increasing Canadians' ability to make healthy and safe food choices.

Canada's world class food safety system continues to provide its citizens with safe food to eat. Additional efforts to promote healthy living through nutritious and safe food choices, can improve the overall health of Canadians, while lowering health care costs.

Proposed Objectives (from online survey):

- ☑ Ensuring that food in Canada is as safe as possible.
- ☑ Preventing and reducing obesity and chronic diseases.
- ☑ Making healthier food more available for Canadians.
- ☑ Preventing food products with misleading labels or deliberately altered content from entering the market.

Comments:

It should be a given that food in Canada be safe to consume and that healthy food needs to be more available for all Canadians so these parameters are equal priorities. Government and industry have taken many strides to make Canadians foods safe and we need to continue to be vigilant in ensuring that food products with misleading labels or deliberately adulterated products are removed from the market. **Our priority is on preventing and reducing obesity and chronic disease and making healthier foods more available to Canadians.** Poor dietary intake, poor diet quality and rising obesity rates have been a public health concern for some time now, as these increase the risk of chronic disease and costs to the health care system, while negatively impacting the health and wellness of individuals and communities.¹⁹ PHAC has estimated the cost of diet-related disease and illness to health care and the economy to be about \$190 Billion/year (\$68 billion is attributed to treatment and the remainder to lost productivity).²⁰

Over half (54%) of Canadian adults over 18 years of age are overweight or obese²¹ and about a third (31%) of children ages 5–17 are overweight or obese.²² A healthy diet is a key factor in maintaining a healthy body weight and preventing chronic disease, however, people who do not have excess weight/obesity can also be at risk for nutrition-related diseases due to poor diet quality. Research confirms that the current dietary patterns of Canadian children and adults are not consistent with the recommended healthy eating guidelines for Canadians^{23 24}, only 31.5% of Canadians report consuming fruit and vegetables five or more times per day²⁵, while intakes of processed and ultra-processed foods are on the rise.²⁶

Food insecurity is a serious public health concern as it affects the overall health and wellness of individuals, negatively impacts mental health^{27 28}, increases risk for chronic disease and contributes to higher healthcare costs.²⁹ Food security is highest in the north and is higher in Eastern Canada vs. Western Canada.

The food environment negatively impacts dietary intake, eating behaviours and diet-related health outcomes.^{30 31} Over the past decades, changes in the food environment have increased access to and the marketing of unhealthy foods and beverages and the proliferation of fast food outlets.³² Some food environments are called “obesogenic”, as they don’t enable healthy dietary

choices and make it difficult to choose whole foods and healthier prepared and pre-packaged options.³³ Food environments generally have encouraged overconsumption of unhealthy foods and beverages—and this can lead to excess weight and increased risk of chronic disease.³⁴ In some areas, particularly areas of extreme poverty or very rural or isolated communities, access to healthy and affordable foods may be very limited, making it difficult to obtain healthy foods.³⁵ There has also been a simultaneous transition in food preparation and cooking skills, with a general decline in food and nutrition-related knowledge and skills among Canadians.^{37 38} Marketing to kids has gotten out of control with research showing that children can be exposed to over 25 million food and beverage ads a year through websites, with over 90% of product ads for unhealthy foods — mostly processed foods and beverages which are high in fat, sodium, or sugar.³⁹

The current status of eating patterns and the food environment will require substantial changes supported by a strong Food Policy for Canada to reduce the burden of diet-related disease and increasing health care costs and to ameliorate other social and economic costs to society and the wellbeing of the population. Nutrition and health are fundamental to wellbeing in the population, and therefore need to become **key policy drivers** in the agriculture and agri-food sector. Full integration with a common vision for health and social, environmental and economic sustainability of the food system is critical to balancing current inequities and costs to the system and negative consequences to Canada’s population. While all citizens need food, the capacity to consume food within a healthy diet is limited and undervalued. As such the **Food Policy for Canada must be aligned with goals and objectives of [Health Canada’s Healthy Eating Strategy](#).** This strategy aims to:

- improve healthy eating
- protect vulnerable populations
- strengthen labelling and claims
- improve nutrition quality standards
- support increased access to and availability of nutritious foods

A national food policy must mandate and promote healthy food choices and healthy food environments for all people in Canada addressing the needs of all population groups including pregnant women, infants, children and youth, adults and seniors, vulnerable people, Indigenous people and newcomers to Canada.

The Food Policy should support breastfeeding, which is critical for an infant’s health and wellbeing. As stated in Protecting, Promoting and Supporting Breastfeeding: the Special Role of Maternity Services. Geneva: A Joint WHO/UNICEF Statement:

- *“Breast-feeding is the unequalled way of providing ideal food for the healthy growth and development of infants and has a unique biological and emotional influence on the health of both mother and child.” and*
- *“For breast-feeding to be successfully initiated and established, mothers need the active support during pregnancy and following birth, not only of their families and communities, but also of the entire health system.”⁴⁰*

A national food policy should guarantee that everyone in Canada has secure access to safe drinking tap water at all times. Many of Canada's indigenous communities do not have continuous access to safe drinking water.^{41 42}

The Food Policy for Canada should Integrate Health Canada's work from *Toward Restricting Unhealthy Food and Beverage Marketing to Children* into a national food policy. Food and beverage marketing has a strong influence on the food choices Canadians make causing healthy eating to be a challenge. Children and youth are particularly susceptible to commercial marketing and need to be protected from marketing influences on their food and beverage choices.⁴³

The national food policy must ensure support for food literacy opportunities in schools and in the community. Food literacy is a set of interconnected attributes organized into the categories of food and nutrition knowledge, skills, self-efficacy/confidence, food decisions, and other ecologic factors (external) such as income security, and the food system.⁴⁴ There is recognition that food literacy has a significant influence on eating behaviour. "Food literacy builds resilience, confidence to improvise and problem solve and the ability to access and share information...".⁴⁵ Research shows that lifestyle habits are developed early, thus consistent messaging and education on nutrition and food literacy should be provided from a young age⁴⁶ and throughout the lifecycle.

The [Health Canada's Healthy Eating Strategy](#) page states, "all levels and areas of society need to work together to improve healthy eating in Canada. This will require the help of all Canadians."

The national food policy should **encourage and support the development and maintenance of local and provincial food policy councils** to reinforce the goals and objectives of the national food policy council. Food policy councils can address social, environmental, economic, and health goals and play an important role in improving the health and sustainability of our food systems.⁴⁷

Food policy councils can support policies on:

- food procurement, land designation, commercial, and building by-laws⁴⁸,
- supporting those who wish to grow and raise their own food within their neighbourhoods⁴⁹, and;
- protecting neighbourhoods from proliferation of retail food outlets that sell foods high in added sugars, sodium, and saturated fat.⁵⁰

The Ontario Food and Nutrition Strategy⁵¹ can serve as a model for a National Food Policy.

The Ontario Food and Nutrition Strategy identifies clear, specific policy options that can support current initiatives and inform future food and health policy directions at the provincial and national level.

The Ontario Food and Nutrition Strategy is an expert- and evidence-informed plan for healthy food and food systems in Ontario. The Ontario Food and Nutrition Strategy was developed by a dedicated group of key actors who collaborated with the goal of strengthening Ontario's food systems and improving the health and well-being of Ontarians.

The Ontario Food and Nutrition Strategy provides a plan for healthy food and food systems in Ontario to address the interconnected nature of food systems and health using a whole-systems perspective.

- **The purpose of the strategy is to provide a cross-government, coordinated approach to food policy development and implementation.**
- This strategy aims to reduce the burden of obesity and chronic disease on people in Ontario and the Ontario healthcare system; promote wholistic health and well-being; and strengthen the Ontario economy and the resiliency of food systems.
- This report presents 25 priority action areas developed by a dedicated group of experts and stakeholders to propose a strategy that will address food access, food literacy and promote healthy food systems in Ontario.
- The main themes of the report reinforce the importance of:
 - Healthy Food Access: People in Ontario have access to and the means to choose and obtain safe, healthy, local and culturally acceptable foods.
 - Food Literacy and Skills: People in Ontario have the information, knowledge, skills, relationships, capacity and environments to support healthy eating and make healthy choices where they live, gather, work, learn and play.
 - Healthy Food Systems: Ontario has diverse, healthy and resilient food systems that promote health and contribute to an equitable and prosperous economy.
- The Ontario Food and Nutrition Strategy is available <http://sustainontario.com/work/ofns>

3. Conserving our soil, water, and air

Using environmentally sustainable practices to ensure Canadians have a long-term, reliable, and abundant supply of food. The way our food is produced, processed, distributed, and consumed - including the losses and waste of food - can have environmental implications, such as greenhouse gas emissions, soil degradation, water quality and availability, and wildlife loss. While much is being done to conserve our natural resources, further opportunities exist to do more.

Proposed Objectives (from online survey):

- ☑ Reducing greenhouse gas emissions produced by Canada's agriculture and food industry.
- ☑ Conserving our water, air, soil and biodiversity to ensure that Canada can continue to produce safe and healthy food.
- ☑ Making it easier for consumers to identify food that is consistent with their values (e.g., fair trade, animal welfare, environmental stewardship of natural resources, protection of habitat and biodiversity) through product labelling.
- ☑ Reducing the amount of food wasted in Canada.

Comments:

Revise the title of the pillar from, “*Conserving our soil, water, and air*” to, ***Sustainable stewardship of our land, water and air to ensure a food system that is good both for people and the planet.***

Sustainability is imperative to meet both current needs for food and to maintain the ability to meet the needs of future generations.⁵² **Sustainability includes protecting land, water, and air, as well as developing capacity for resilience in changing conditions.** The basis for sustainability is developing agricultural and production practices that limit environmental impacts and conserve resources, while meeting peoples’ nutrition needs. Changes to current practices of both the food system and of eaters are needed, such as re-tooling the food system to be supportive of broad adoption of sustainable diets that are more plant-based, to reduce greenhouse gases as well as to reduce both the personal burdens and escalating health care system demands from diet-related chronic diseases.⁵³ Another aspect of sustainability is reversing the divide between producers and consumers, to build synergy around their mutual interest in feeding people. A lever for increasing more connectedness could be fostering a paradigm shift in valorization of food, resulting in the food industry regarding it a resource to be protected in achieving results, and consumers viewing it as too good to risk wasting.

The National Food Policy should support preserving agricultural land for food production and in particular more effective land use planning, including saving our soil and class 1, 2 and 3 land from development. Once such land is paved over it is no longer viable for food production. We support public health focused land use and design policies which create healthy, sustainable communities by recognizing the value of: protecting the natural environment (air, land, water), reducing community exposure to health hazards (e.g. transportation and point source emissions of pollutants, injuries), opportunities for increased physical activity and recreation; access to healthy food choices; social equity and cohesion; safety and security; and our aging and diverse population.⁵⁴

We suggest revising the following objective from, “Reducing the amount of food wasted in Canada”, to, **“Supporting and incentivizing prevention of wasted food by both the food industry/market sector and by consumers”**.

Food waste is vitally important as an objective under this theme, but rather than focussing on food waste reduction (recovery and diversion from the waste stream), **the most benefits will be realized through a comprehensive range of strategies that target the prevention of food becoming wasted⁵⁵ at its source points— across both food industry and consumers.** Instead of downstream food waste management approaches, there is more potential in prevention-related economic and policy tools, incentives and waste disincentives, targeted social marketing and educational resources, and support for the development of a broad range of consumer food literacy attributes.⁵⁶ See the collaborative submission from OPHA, OSNPPH, Dietitians of Canada, and PROOF researchers at University of Toronto to the Ontario government in response to the “Discussion Paper - Addressing Food and Organic Waste in Ontario.”⁵⁶

Important amongst upstream levers is expanding current legislation to ensure industry is held responsible for waste generation, including through recovering resources and minimizing waste throughout the supply chain. A key action to support prevention would be enacting a legislative ban on food waste as a tool to correct the environmental impacts and financial costs to the

public of food waste generated by the food industry. Other actions include strong disincentives such as disposal fees, and fines relative to the value of carbon footprint equivalency for resource inputs (e.g. growing, packing, transportation of wasted food). The aim is substantial limitation of surplus food. When there is surplus food with potential for rescue/recovery purposes, there should be no government-supported incentive for such activity, since doing this essentially rewards and encourages further food wastage.⁵⁶

We recommend adding the following objective: **Supporting sustainable production of health-promoting foods**. Sustainability throughout the entire food system is imperative. Sustainable growing and producing of health-promoting food (e.g. beans, legumes, vegetables, fruit) can reduce environmental impacts and increase the availability of healthy, safe, culturally acceptable, accessible food that supports healthy, sustainable diets.⁵⁷ (This would complement theme 4).

Glossary

Sustainable diets - Diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources.⁵⁷

4. Growing more high-quality food

Ensuring Canadian farmers and food processors are able to adapt to changing conditions to provide more safe and healthy food to consumers in Canada and around the world. Enabling farmers and food processors, large and small, across the country, to grow, will make more high-quality Canadian food available domestically and internationally. Budget 2017 investments clearly recognize the importance of the agriculture and food sector as a driver of economic growth.

Proposed Objectives (from online survey):

- ☑ Supporting new farmers to help them establish successful farms.
- ☑ Preserving agricultural land for food production.
- ☑ Helping the agricultural and food sectors (e.g. food processing and fisheries) innovate and adapt to changing production conditions and market demands.
- ☑ Helping businesses increase exports of Canadian food products to meet the growing global demand.
- ☑ Enhancing Canada's reputation as a preferred food supplier worldwide.

Comments:

This theme should be called **“Growing and promoting more high-quality, health-promoting Canadian food”**. We can grow more high-quality food but these foods are not always “nutritious or health promoting”. **Food products manufactured and imported to comprise our food supply and sold in our food environments must promote health**; PHAC⁵⁸ has estimated

the cost of diet-related disease and illness to health care and the economy to be about \$190 Billion/year (\$68 billion is attributed to treatment and the remainder to lost productivity). Agriculture and agri-food profit cannot be earned at the expense of other parts of our economy - our health care system is overburdened, we have proof that diet-related disease takes a toll on workplace participation too. Marketing of unhealthy foods, particularly to children, must be eliminated. It is estimated that children are exposed to more than 25 million food ads for mostly unhealthy foods in one year through websites.⁵⁹ We can do more to encourage Canadians to choose healthy foods produced in Canada, such as vegetables and fruit, beans, lentils, legumes, etc.

A national food policy should recognize that change is not just about growing more food, but re-designing Canada's food systems for sustainability inclusive of social, environmental, and economic criteria.⁶⁰ Food systems growth is more than increasing exports and overall productivity. Simply producing more food may not be an effective solution. Changes in production, distribution, retailing, and consumption to increase efficiencies and reduce food losses should be encouraged jointly with efforts that prioritize nutritious, high-quality foods.⁶¹

We suggest addition of an objective that recognizes the importance of nutrition when developing agri-food policy such as: ***Supporting sustainable production of health-promoting crops.***

Healthy foods such as vegetables and fruit should be prioritized to support dietary recommendations and to economic growth. As fruits and vegetables are high-value-per-acre crops, expanded local production would generate more economic activity in these and related sectors.⁶² An optimal diet, based on Canada's Food Guide, would lead to higher consumption of fruits and vegetables and an increasing consumer demand for most of these products. Further research and consideration should be given to possible structures and the potential gains and barriers to implementing federal subsidies for fruits and vegetable production⁶³

Revise the following objective from, "*Helping businesses increase exports of Canadian food products to meet the growing global demand*" to ***Helping businesses increase domestic sales and exports of Canadian food products to meet the growing domestic and global demand.*** Similarly change the objective from, "*Enhancing Canada's reputation as a preferred food supplier worldwide*" to ***Enhancing Canada's reputation as a preferred food supplier locally and globally.*** International markets are not alone in untapped potential. High-quality, locally produced food is important to Canadians. Three-quarters of consumers are willing to pay more for locally produced food and 97% of Canadians purchase local produce to support the economy.⁶⁴ Support for and investment in a diverse agri-food sector is needed with greater opportunities for local and regional food systems.

Include food sovereignty is development of the national food policy. It is important that Canadians have a voice in how their food is produced and where it comes from. Collaborative action to achieving food sovereignty for Indigenous peoples is critical to reconciliation efforts. As stated in the National Student Food Charter, "food sovereignty seeks to rebuild the relationship between people and the land, and between those who grow and harvest food and those who eat it".⁶⁵ "Indigenous knowledge, ways of knowing and cultural practices must be respected and encouraged, and hunting, fishing and gathering must be supported as key food provisioning activities alongside farming and ranching".⁶⁶

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