

September 29th, 2017

Subject: Formal response to consultation on A Food Policy for Canada

Dear Minister MacAulay:

You have solicited the help of Canadians to develop the key elements of a Food Policy for Canada, including the vision, principles, objectives, and short-term actions. The Ottawa Food Policy Council (OFPC) would like to submit the following response to your call for input.

OFPC is comprised of individuals representing all aspects of the food system, working together towards a food system in Ottawa that emphasizes social and economic viability and environmental sustainability throughout the entire food cycle. OFPC facilitates local discussions on the elaboration of policies related to food and is uniquely positioned to provide cross-sectoral input that reflects the citizen voice.

One of the discussions OFPC facilitated was during the last municipal election, where OFPC convened a wide array of stakeholders from the Ottawa region to discuss the food system. During these discussions, stakeholders agreed on a definition of Good Food: ***Good food is fresh, accessible, affordable, culturally relevant, minimally processed, as local as possible, and ecologically grown.*** It is this definition of Good Food that informs our work, and how we define “high quality” food—a term you have used in the consultation.

OFPC believes the following six (6) recommendations will help create a representative and action-driven Food Policy for Canada that will serve to improve our Canadian food system while addressing fundamental food issues for our citizens.

Recommendation 1: Canadians need a food policy based on a systems approach

OFPC believes a Food Policy for Canada should take a **systems approach to address social, environmental, economic, and health implications of food systems**, rather than the current “siloeing” of food related issues. The vision, mission, and objectives of the Food Policy for Canada should take this approach into consideration at every stage of the policy development process.

Every “theme” in the Food Policy for Canada should include concrete objectives to address social, environmental, economic, and health. It is recommended that the four proposed themes be reworked to include all of these components.

OFPC points out that this will require **horizontal policy-making**. Canada needs **government departments to work together** in an interdisciplinary manner to achieve consensus on policies/strategies that they are expected to implement.

Federal departments should also be expected to **work collaboratively with all actors in the value chain** – provincial, municipal, industry, non-governmental organizations, urban and rural, Indigenous – to contribute to the Food Policy for Canada and the general development of Canada’s agri-food policies.

Recommendation 2: Canadians need a food policy governed with transparency, accountability, and free from conflict of interest:

A Food Policy for Canada must be democratic and participatory. A new **multi-stakeholder body** should be created to oversee the development and implementation of the Food Policy for Canada and resourced to direct future policy adaptation. This body should include experts from multiple governmental departments but must **function independently** and should **not be tied to any existing departmental priorities**.

The governance body must **include a sizeable civil society component** with federated representation of local food policy councils. Indigenous communities must be integrated as a level of government parallel to the federal government, and not equivalent to a plurality of civil society interest groups.

Participation of private sector actors must be carefully considered and managed for identification and avoidance of conflicts of interest. Private sector actors should be limited to participating in discussion and debate, and excluded from decision making processes.

While it is important that the governance body provide for the input and engagement of all stakeholders, it must recognize the inequity among them. Impoverished Canadians struggling to feed their children, independent family farms struggling to maintain their solvency, and municipalities struggling to increase public health all have a stake in food systems design that is fundamentally more critical than large corporations or sector groups wanting to increase their profits. The governance body must ensure that primacy of **emphasis is given to the voices of those whose viability and existence are at stake**.

Measurement and evaluation must be an important part of a Food Policy for Canada. The policy must identify indicators for its objectives, establish baselines and track the progress against these objectives at set intervals. Tracking of identified indicator data is not enough; a Food Policy for Canada needs to mandate evaluation of indicators, and have the flexibility to adapt and evolve itself and its objectives to the outcomes of such evaluations.

Improved data collection and sharing for agri-environmental data is also essential. There is a need to establish objective and reliable reporting of aggregate environmental performance in the agri-food sector. **An open and transparent approach to data sharing** will generate measurable outcomes, encourage public engagement, and strengthen decision-making.

Recommendation 3: Canadians need a food policy that enhances literacy, health, and sustainability:

A Food Policy for Canada should promote an understanding of food systems and **enable access to healthy food options and sustainable diets**. It should support local and sustainable food production and facilitate links between these producers and consumers/eaters.

This can be achieved by:

- Promoting education about, and connection to, food and food systems for all Canadians;
- Supporting local farmers and harvesters, and by facilitating links between these producers and local eaters;
- Improving access (physical and financial) to local, fresh, and healthy food (e.g., in convenience stores, groceries, etc.);
- Ensuring local procurement policies to provide local, fresh, and healthy food in municipal institutions, schools, child care centres, hospitals, shelters, and other community organizations;
- Ensuring policies are in place to support urban agriculture initiatives, such as community gardens;
- Ensuring everyone has access to safe drinking water;
- Supporting the development and evaluation of income-based solutions to address household food insecurity; and
- Supporting the restriction of food and beverage marketing to children and youth.

A Food Policy for Canada should **support comprehensive food literacy opportunities in schools, the community and beyond**. Comprehensive food literacy would include the concept of food systems as well as nutritional knowledge and food preparation skill acquisition. Canadians of all ages need to be equipped to make sustainable and nutritious food choices. Education, especially among youth and adolescents, is the first step towards ensuring Canadians have the ability to prepare nutritious and balanced meals for themselves, and be involved in shaping future food systems. Adult and population education is also critical.

This can be achieved by:

- Revising all current food-related curricula to reflect the complexities of modern day food systems;
- Ensuring that there is at least one mandatory food preparation course at high school level (to ensure basic cooking skills, as well as macro-nutrition and food system literacy);
- Implementing a universal national school food program and enhancing instruction in schools on food preparation, nutrition, etc.; and
- Using behavioural marketing and community education techniques to promote healthy food choices and food system knowledge.

A Food Policy for Canada **should ensure a socially, economically, and ecologically sustainable food system**. The current dominant form of food production is unsustainable and has been a significant contributor to climate change. Some practices in our food system deplete soils, contaminate groundwater and surface waters, and contribute to carbon pollution. The adoption of beneficial management practices throughout the food system can mitigate these

impacts. **Food systems also need to be socially and economically sustainable, remunerating and treating all actors at all levels in a just manner.**

This can be achieved by:

- Establishing a supportive environment for social and ecological innovation throughout the food system from production to waste;
- Promoting sustainable practices (e.g., beneficial management practices);
- Encouraging climate change mitigation strategies within the food system;
- Providing supports, incentives, and/or training for individuals within the food system to adopt sustainable practices;
- Protecting agricultural land; and
- Supporting organic and agro-ecological production, which can grow high quality food.

A Food Policy for Canada should **establish a supportive environment for social and ecological innovation throughout the food system.** A Food Policy for Canada should also include programs to incentivize the adoption of beneficial management practices. It should support farmers and harvesters to adopt beneficial management practices through incentivization and reward-based programs.

This can be achieved by:

- Collectively identifying lessons learned from existing incentive and reward-based federal (e.g., Growing Forward 2/Canadian Agricultural Partnership), provincial, and watershed initiatives;
- Widening the scope of these initiatives to include alternative practices (e.g., carbon sequestration) and funding mechanisms such as credit trading programs (e.g., water quality and quantity trading); and
- Ensuring these initiatives are flexible enough to be tailored to local watersheds and agri-regions and designed collaboratively with federal, provincial, watershed, and community organizations, ENGOs, commodity groups, etc.

A Food Policy for Canada should allow **small family farms the necessary tax and economic incentives** to operate in a highly competitive and global food supply system. **Small-scale farmers should be able to thrive** in a food production system that takes into account the unique operating environment of the more than 180,000 family farms in Canada, while also recognizing that 43,457 are registered as family farm corporations (as of 2016).

Consideration should be given to implementing Canada Income Tax Act amendments to enable family farms to continue to operate and allow for less complexity in succession planning, and elimination of other economic barriers, irrespective of their incorporation.

Possible indicators include:

1. Number of family farms in Canada is increasing
2. Average income of family farms in Canada remains constant or increases

Recommendation 4: Canadians need a food policy that increases access to food:

Over the past decade headlines have sounded the alarm that an increasing number of Canadians are needing to access food banks across the country. This phenomena has been attributed to numerous factors such as high student debt, the increasingly precarious nature of work, and a growing elderly population on fixed incomes. This increase in food bank usage indicates that greater measures need to be taken to address food accessibility that go beyond simply relying on the markets and charity to feed Canadians.

Canadians have come to live increasingly in car-dependent communities. With this we have seen the problem of “food deserts” emerge. Food deserts are spaces where those without access to a vehicle find themselves without nutritious food options, like supermarkets. A Food Policy for Canada could address food deserts by **assisting municipalities and unincorporated regions in developing the infrastructure necessary ensure Canadians have the ability to access locations where good food is available.**

Northern and remote communities have experienced difficulties with consistent and affordable access to good food. Reforms to the Nutrition North program eliminated the food mail component that sought to address northern food security. This program replaced the delivery of food with subsidies to profit-seeking food distributors. This reform has seen little impact on food accessibility in northern and remote communities. The Canadian Union of Postal Worker have made a suggestion for a new vision for Canada Post that includes the expansion of their facilities as food distribution hubs. A Food Policy for Canada could include such a vision for **new uses of existing infrastructure to address issues like access to good food**—with an emphasis on locally-harvested country food—in remote and northern communities.

Many Canadians already have access to affordable food; however, it is not often the case that such food is nutritious. A Food Policy for Canada should address food accessibility in a deeper manner than affordability. Accessibility needs to **ensure that the food that is available meets our criteria for Good Food.** Accessibility should also be defined in a deeper sense that goes beyond opportunities to purchase food. A Food Policy for Canada should additionally explore increasing accessibility through income-based solutions.

A Food Policy for Canada should also consider the inclusion of **opportunities for a public, non-market means for acquiring food.** The creation of a universal (non-means tested) “public option” for food could take inspiration from the one-time U.K. Ministry of Food that sought as its mandate to ensure sufficient nutrition for all citizens. Examples of such programming can be seen in earlier, publicly-operated forms of the United States’ National School Lunch Program. Public options for food could double as a means of guaranteeing receipts for producers as a domestic public marketing body for agricultural producers beyond sectors that are already supply managed.

Recommendation 5: Canadians need a food policy that respects their food sovereignty:

A Food Policy for Canada **should improve access to fresh, healthy, culturally appropriate food for all**. All Canadians have the right to sufficient fresh, healthy and culturally appropriate food, and the right to define their own food and agricultural systems. This right should be exercised at all jurisdictions, but particularly through local and municipal systems. The Federal and Provincial Governments should work collaboratively to identify and reduce systemic and legal blocks to effective food governance at the Municipal level.

A Food Policy for Canada must ensure genuine Indigenous food sovereignty, including providing better support for food-insecure communities, engaging in a nation-to-nation relationship with Indigenous peoples, and advancing reconciliation. This needs to go **beyond symbolic politics of recognition and cultural accommodation, moving more towards commitments to territorial, economic, and political sovereignty for Indigenous nations**. This would include honouring commitments of the Crown contained within existing treaties, as well as a veto power for Indigenous nations over resource and infrastructure development on traditional territory without cessation of territorial claims.

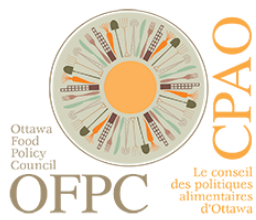
A Food Policy for Canada should provide delegation of mandate and resources for food policy within Indigenous nations. Indigenous Traditional Knowledge of country foods and food production should be incorporated into A Food Policy for Canada. It could also implement initiatives to support increased capacity for local food production, particularly in the North, and less reliance on imported, southern-grown and -harvested foods.

Canada's system of supply management is an important element in our nation's food sovereignty, and must be protected within international trade negotiations. At the same time, the system should be adapted to better meet the needs of Canadians and farmers, primarily through facilitating easier entry into production (i.e. through distributing quotes through a delegation of need rather than auctions), and introducing caps on the amount of quota that can be owned by individual farming operations.

Recommendation 6: Canadians needs a food policy that facilitates a safe and traceable food system:

A Food Policy for Canada should facilitate **a safe and traceable food system; that is, in which there is tracking of food throughout the supply chain** -- from growers and producers to suppliers, processors, brokers, retailers, and regulators -- to enable reductions in contamination response times, and increase fraud prevention (e.g., packaging claims such as "GMO-Free" or "Organic") and knowledge of place of origin (country of origin or specific farm).

Implementation of new technologies, such as blockchain, that enable end-to-end transparency in the Canadian food system should be considered. This would allow food suppliers to more efficiently source information about the origin, condition, and movement of food, and to trace contaminated food.



Possible indicators include:

1. % of food available to Canadians that is traceable is increasing
2. Response times for tracing contaminated food is declining
3. Fraud-related claims on foods sold in Canada are declining

In conclusion, OFPC thanks you for the opportunity to provide input into a Food Policy for Canada that will help improve our Canadian food system while addressing fundamental food issues for our citizens.

OFPC looks forward to receiving your response to this letter. You can contact us by email at info@ofpc-cpao.ca. For more information about OFPC please refer to www.ofpc-cpao.ca.

Sincerely,

Christopher Kelly-Bisson

Acting Chair, Ottawa Food Policy Council

CC:

The Honourable Catherine McKenna, Minister of the Environment and Climate Change

The Honourable Ginette Petitpas Taylor, Minister of Health

Paul Glover, President, Canadian Food Inspection Agency

The Honourable Jane Philpott, Minister of Indigenous Services

The Honourable Carolyn Bennett, Minister of Crown-Indigenous Relations and Northern Affairs

The Honourable Navdeep Singh Bains, Minister of Innovation, Science and Economic Development

The Honourable Patricia A. Hajdu, Minister of Employment, Workforce Development, and Labour

The Honourable Jean-Yves Duclos, Minister of Families, Children and Social Development

Christopher Kelly-Bisson, Acting Chair, Ottawa Food Policy Council