September 29, 2017

Via Email: lawrence.macaulay@parl.gc.ca and FoodPolicy-PolitiqueAlimentaire@Canada.ca

Agriculture and Agri-Food Canada
1341 Baseline Road
Ottawa, Ontario K1A 0C5

Dear Minister MacAulay and staff of Agriculture and Agri-Food Canada:

On behalf of the City of Vancouver, I am pleased to provide a response to the federal Food Policy consultation questions. As a City of Reconciliation, we also wish to note that we are on the unceded homelands of the Musqueam, Squamish, and Tseil-Waututh. We are grateful to the Government of Canada for taking a leadership role in working to create a national food policy for Canada.

This response is one of three submissions that Vancouver has submitted to the federal government on priority issues. In November 2016, the City provided a brief on affordable housing and in June 2017, we responded to the call for a national poverty reduction strategy.

It is our hope that the federal government will take a coordinated, cross departmental approach to these topics given that housing, income and access to healthy food are core building blocks of social determinants of health. This is expressed in Vancouver’s Healthy City Strategy that provides our overarching framework for the health & wellbeing of all residents. Our vision for a just and sustainable food system is detailed in the Vancouver Food Strategy (2013), and through its implementation a wide range of partners have worked with us to increased food assets like neighborhood food networks, urban farming policy, gardens, kitchens, local food jobs, and an emerging food waste strategy.


However, there are a number of gaps and vulnerabilities facing Vancouver as well as other urban centres that are explained further in the attached submission. These include inadequate regional food reliance, food affordability and access, and the need to build resilience to mitigate climate change. The Lower Mainland which includes 21 municipalities including Vancouver, comprises over 80% of the BC population (or 3.5 million people), but is only 40% dietary self-reliant. About one in five of Vancouver’s residents are low income, and the increase in food costs of 27% between 2008 and 2016 has exacerbated the effects of poverty and dependency on food banks, and adds to the already challenging situation of affordability for lower and middle income residents. The realities of climate change, dramatic losses in agricultural land, and increasingly distant food supply chains means that bolstering the capacity of local and our national food system is critical for all Canadians.
Together we have a core need to feed ourselves well now and to ensure the flourishing of future generations. We would be pleased to meet with you or to discuss these over the phone in more detail. Please don’t hesitate to contact me.

Kind regards,

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City of Vancouver’s Recommendations to the Federal Government’s National Food Policy

A Just and Sustainable Food System for All

City of Vancouver submission to the Government of Canada
September 2017
1. Introduction

In January 2013, City Council adopted the Vancouver Food Strategy, an official plan and road map that integrates a full spectrum of urban food system issues within a single policy framework that includes food production, food processing, distribution, food access and food waste management. The five goals express how we want our food system to take shape now and in the future:

1. Support food-friendly neighbourhoods
2. Empower residents to take action
3. Improve access to healthy, affordable, culturally diverse food for all residents
4. Make food a centrepiece of Vancouver’s green economy
5. Advocate for a just and sustainable food system with partners and at all levels of government

The Vancouver Food Strategy integrates and aligns specifically with our City’s Healthy City Strategy and the Greenest City Strategy and food also plays an important role in our local economy. The Vancouver Economic Commission’s recent analysis of green jobs in the city indicates that local food jobs have increased 27% over three years, from 5992 in 2013 to 7604 in 2016. This is partly attributable to strong consumer demand for local, healthy food options. Of concern however, is that most jobs in the food sector pay below median income.

The City of Vancouver’s poverty rate (22%) is higher than most similarly sized cities in Canada.\(^1\) Vancouver has among the highest gap in income between rich and poor relative to other major cities in Canada, exacerbated by increased costs of housing and food combined.\(^2\) Over 40,000 of Vancouverites older than 12 report that they did not have enough to eat.\(^3\) Addressing income insecurity will have the greatest impact on food insecurity, and this underpins the need for federal government’s leadership on the development and implementation of a national poverty strategy.

Vancouver population is 24% of the Lower Mainland, but has only 1.3% of the farm land base.\(^4\) Our wider bioregion is only considered to be 40% dietary self-reliant.\(^5\) Given Vancouver’s dependence on the wider bioregion, the province and beyond for our food needs, we are strongly influenced by federal policy related to farm supports, agricultural research, trade, and food safety.

These issues form the backdrop for our responses to the consultation questions and our recommendations to the federal government.

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\(^1\) Statistics Canada, 2016 Census of Population.
\(^2\) For example, the My Health My Community survey conducted by Metro Vancouver area health authorities found that people with lower incomes were less likely to report a strong sense of belonging or to have four people in their social support network: [http://www.myhealthmycommunity.org/](http://www.myhealthmycommunity.org/)
\(^3\) Canadian Community Health Survey, 2012 data.
\(^5\) Kwantlen Polytechnic University. The Future of our Food System – Summary of the Southwest BC Bioregion Food System Design Project, 2016.
2. Responses to the Federal Consultation Questions

General question 1
What issues concern you most when it comes to thinking about food? What are the opportunities?

1. **Income security and food security** – The City of Vancouver is concerned about the increasing level of food and income insecurity among residents. About 44% of people in Vancouver, or more than 250,000 live in families with incomes less than the living wage\(^6\) and Vancouver’s child poverty rate is 22%.\(^7\) For further background and recommendations related to poverty reduction and income security, please see the City of Vancouver’s recent submission related to the national poverty reduction strategy, available at http://vancouver.ca/files/cov/prosperity-for-all-through-a-healthy-communities-approach.pdf

Individuals living with food insecurity report poorer health, higher rates of obesity, poorer mental health and more mood and anxiety disorders.\(^8\) Health care costs are 76% higher for individuals who are food insecure.\(^9\) Sustainable and adequate sources of income for households are foundational to achieving sustainable food security; the charitable model will not resolve food insecurity.

**Opportunity**: Integrate the federal poverty reduction strategy with the emerging national food policy, because addressing income security is required in order to address food insecurity. There is potential to improve housing affordability, access to public transportation and child care thereby increasing disposable income. A recent article suggests that a Basic Income Guarantee would more effectively address food insecurity than more targeted policies and programs, such as interventions that increase minimum wage, raise social assistance rates, or offer in-kind supports to specific at-risk groups.\(^10\)

Additionally, ensure adequate and regular food insecurity data are available by making the Household Food Security module of the Canadian Community Health Survey (CCHS) mandatory.

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\(^6\) The analysis presented here assumes that the hourly living wage is applicable to a two-parent family with two children, to a lone parent-led family with one child, or to a single person living alone. For other family sizes, income is adjusted by the square root of the number of persons. Note that the assumption of the living wage being applicable to a lone parent family requires more robust redistributive social programs than currently exist, so this understates the share of lone parent families who may struggle to make ends meet. See Ivanova, I., “Why the Metro Vancouver living wage is not enough for single parents and how to fix it,” www.policynote.ca/living-wage-and-single-parents/.

\(^7\) Statistics Canada, 2014 T1 Family File, Accessed through Community Data Program (CCSD)


2. **The cost of food** – The cost of food continues to increase. It cost $974 for a healthy food basket for a family of four in BC in 2015, an increase of 27% since 2006, and an increase of 56% since 2001. Coupled with the increasing costs of housing, childcare and other services, this cost increase is most felt by families and individuals with low income who spend proportionally more of their income on food. These cost increases put stress on individuals and families and make it difficult to eat well.

*Opportunity:* Given the influence of climate change on food prices, there is a critical opportunity for Canada to achieve and exceed climate change targets, and to build the resilience of our own agricultural system through adaptation and mitigation. It’s important that any policies to address the cost of food maintain or increase the incomes of growers and food producers, otherwise food insecurity among these groups would be unintentionally worsened.

3. **Climate change - ecological and economic impacts - and social justice** - Our food system is inextricably linked to our environment, contributing to greenhouse gas emissions, soil degradation, decreases in water quality and availability, and wildlife loss. Simultaneously, climate change threatens our food production and food security. While climate change impacts all Canadians, it can have a greater impact on those with the least financial resilience.

*Opportunity:* Ensure the concept of health includes all social determinants of health, and recognize that other sustainability goals – environmental and economic – are all equally interconnected. There is an opportunity to marry the value that Canadians place on a healthy environment with agricultural, economic, health and equity goals.

4. **Food System Resilience** - As an urban centre, we rely heavily on food from outside of our city limits. Local food supplies and local food self-reliance helps buffer against food system disruptions (e.g. droughts in our supply chain, local earthquakes) and also provides local control over food quality.\(^\text{11}\) As such, we are concerned by threats to agricultural land from development and financial pressure, the reduction in the total farm area in BC and the increase in farm size\(^\text{12}\), the loss of farmers\(^\text{13}\), and poor working conditions for migrant farm labourers.\(^\text{14}\) Additionally, trade agreements, like the proposed CETA and TPP can restrict our city and other local institutions from specifying a preference for locally grown and processed foods thereby limiting our ability to support our local farmers and food processors.

*Opportunity:* Encourage domestic food production for domestic consumption and not just for export. Food should be designated as a basic right and specific healthy, whole foods should be exempted from trade agreements. There is also an opportunity to work with the Provinces to preserve farm land, provide extension services to farmers, and address the documented concerns related to the Seasonal Agricultural Worker Program.

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Thematic question 1

How do you think the federal government could help increase access to affordable, nutritious, and safe food?

1. Embrace the ‘Right to Food’ in principle and in practice and ensure sustainable and adequate sources of income for households. Income security is critical to achieving sustainable food security. Charity as a response to poverty does not provide long-term sustainable solutions. It is also important to recognize and ensure that any work to make food more ‘affordable’ does not compromise food growers’ / producers’ livelihoods and their food security.

2. Provide financial subsidies for a specific set of healthy, locally grown whole foods. Contributing financial support to a specific set of healthy whole foods (‘staple foods’) for all would enable healthy food access by reducing the cost of those foods for individuals, families, and non-profit service providers; ensure stable market development for farmers; and provide food security both short and long term.

3. Work with Provinces and Territories to create a cost-shared universal healthy school food program to ensure that all school children learn basic food skills and have access to healthy, nutritious meals every day. The City of Vancouver invests $450,000/year in school food programs which complements BC’s $1.6 billion for Vancouver elementary school meal programs. These financial investments only allow 10-20% of Vancouver’s elementary students to access a formalized school meal program. School meal programs not only benefit classroom learning, but also model healthy eating, teach food skills, and can increase the market for domestic food production. Similarly, the kitchens and cafeterias at three City of Vancouver facilities have been actively involved in providing Vancouver’s most vulnerable adults with nutritious meals at low cost ($2-3.75) for 20-30 years. This model of subsidized food outlet would be well placed in communities across the country while working towards income security for all. The benefits are numerous, including capacity building / training, community engagement, and processing seasonally abundant food.

Thematic question 2

What health and food safety issues concern you the most when it comes to the food you eat?

1. As outlined by a submission to the national food policy consultations on behalf of our local health authority Vancouver Coastal Health, key issues include
   - Food insecurity, as caused by income insecurity
   - Preventable rates of food-related chronic diseases
   - Childhood health, including eating habits and illnesses
   - Indigenous food sovereignty

Food also plays an important role as social connector and community builder. These roles build community resiliency. It’s important to consider the health impacts of how, where,
and with whom food is consumed, and we are pleased to see that early drafts of the Food Guide acknowledge this important aspect of eating.

2. City of Vancouver is pleased to see and encourages continued Federal leadership on:
   - limiting marketing to children
   - revising Canada’s food guide
   - improving food labelling

We are particularly pleased to see Federal efforts to limit industry influence in these areas given that food companies and farmer’s associations have a long history of pushing for weaker nutrition guidelines which lead to ill health. We also support efforts to include the integration of environmental sustainability principles and guidance into these initiatives.

Thematic question 3

What concerns, if any, do you have about the environmental impact of the production of food, including farming, fishing aquaculture, and food processing?

The City of Vancouver is concerned about food waste and climate change, and is therefore:
- Developing a Zero Waste strategy that has a goal of eliminating the use of landfill or incinerator by 2040; Food is one of key focus areas; and
- Addressing climate change through our Greenest City Action Plan areas including in renewable energy, green buildings, and green transportation

To support this work, our recommendations for federal level support are:

1. Invest in climate change resilience, both in terms of adaption and mitigation
   Our food system is inextricably linked to our environment, contributing to greenhouse gas emissions, soil degradation, decreases in water quality and availability, and wildlife loss. Implementing adaptation strategies in the agricultural sector is critical, as the impacts of climate change on agricultural production are already being felt.

2. Tackle wasted food and unnecessary food packaging
   Up to 40% of food produced in Canada is never consumed, which is a significant waste of resources to grow, transport, and process this food. Wasted food is an area that has received little attention in recent past, and it is a growing area of focus for cities as we deal with a large component of that waste. Food waste occurs all along the food system from production, processing, transportation and consumer wastage in the home.

   In the City’s forthcoming Zero Waste strategy, and as advocated by the National Zero Waste Council and Metro Vancouver, there is opportunity for the Federal government to:
   - Set a national food waste reduction target;
   - Revise labelling regulations to reduce consumer confusion about expiry dates including terms such as ‘best before’, ‘use by’, ‘sell by’;

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15 David Ludwig and Marion Nestle. Can the food industry play a constructive role in the obesity epidemic? *JAMA*, 2008: 300(15).
• Stimulate innovation in food and energy recovery technologies by ensuring their eligibility in existing research and development streams;
• Partner with municipalities and Zero Waste agencies to develop educational tools and campaigns for consumers and food industry stakeholders.

Thematic question 4
When it comes to growing more high-quality food in Canada, what initiatives do you think would help?

1. **Enable and encourage institutional food purchasing of local and sustainable food** to leverage the full health, economic and sustainability impacts of public dollars, and support local producers. Drive demand for local products, and thus support Canadian farmers, by enabling institutional food procurement. Currently, trade agreements, like the proposed CETA and TPP can restrict our city and other local institutions – such as schools, universities or hospitals - from specifying a preference for locally grown and processed foods thereby limiting our ability to support our local farmers and food processors. Similarly, focus supports and policies on meeting and increasing the Canadian demand for local products, rather than focusing on exports.

2. **Work with Provinces and Territories to preserve and protect agricultural lands** to ensure land is available, maintained and used for agricultural production and activities. Agricultural land continues to be under threat from other competing land uses, and it is imperative that land is preserved and enhanced.

3. **Invest in all scales of agriculture, and in particular small and medium scale agriculture that utilizes environmentally sustainable practices.** Include financial supports for infrastructure, education, land preservation, and extension services to mitigate and adapt to climate change. In addition to investing in agriculture, invest and support small and medium-sized food processing infrastructure and entrepreneurs. In order to support more localization, better support for infrastructure and entrepreneurship that can handle the value-added processing, distribution or transportation logistics is needed.

4. **Invest in innovation that supports sustainable, organic and ethical methods of increasing the quantity and quality of food.** Not all farming is the same, and it’s important to support innovation that promotes principles of a just and sustainable food system such as sustainable, organic and ethical farming practices that contributes to health of the people and planet. This includes not investing in, or allowing, the research for and growing of genetically engineered foods.
3. Other recommendations

1. System-wide intersections: Whether municipally, provincially, or federally, the food system impacts and intersects with many departments and files. At the federal level: health, environment, Aboriginal affairs, agriculture, transportation, fisheries, social development, and the economy and trade are all affected by food policy.

   While sustainable development identified through the Bruntland Commission\textsuperscript{16} sought to integrate social (including cultural), economic, and ecological goals, along with the physical and political environments, to reflect people's lived realities, these concepts are rarely connected or implemented in public policy. The risk in not doing so masks the complexity of the issues and we will continue to rely upon narrow approaches and inadequate results.\textsuperscript{17}

   **Recommendation**

   To focus on the leverage points where action in one goal area / ministry / department can support goals in another / ministry / department, and also to ensure that action in one area does not negatively affect another. The process to do so would be enabled by:
   - structures for inter-departmental collaboration and goal setting specifically related to food policy and food systems
   - system-wide coordination to ensure food security, health, and environmental sustainability are each considered in all areas of food policy development

2. As a City of Reconciliation, Vancouver is only at the earliest steps of considering what Reconciliation means in terms of our food system policies and decision making. We are working to strengthen local First Nations and Urban Aboriginal relations, promote Aboriginal peoples' culture, awareness, and understanding, and incorporate First Nations and Urban Aboriginal perspectives for effective city services and sustainable food systems.

   **Recommendation**

   We encourage the federal government to take leadership in working with First Nations, Metis and Inuit peoples to ensure they have more sovereignty over their food lands and to ensure that traditional knowledge is at the heart of food policies and practices. Incorporating Indigenous knowledge and decision making about land management, and about methods of harvesting, preparing, preserving, sharing and celebrating food will improve and strengthen the national food policy itself and strengthen cross cultural collaboration and acceptance.

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\textsuperscript{17} Mary Clare Zak draft thesis. Creating a Culture of Flourishing in the City of Vancouver. 2017.