

November 21, 2019

Dr. Alfred Aziz
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Dr. William Yan
Director of Nutritional Sciences
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Health Canada
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Re: National Nutritious Food Basket and National Food Costing Protocol

Dear Dr. Aziz and Dr. Yan:

To facilitate consistent and effective provincial/territorial and local monitoring of food affordability, the Middlesex-London Board of Health requests that Health Canada update the food list in the National Nutritious Food Basket to reflect recommendations in the 2019 Canada's Food Guide and develop a national food costing protocol.

Food insecurity, the inadequate or insecure access to food due to financial constraints, is a key social determinant of health that contributes to health inequities. It impacts one in seven households in Middlesex-London, Ontario, and Canada, with negative effects on physical and mental health. Routine monitoring of food affordability is needed to help generate evidence-based recommendations for collective public health action to address income inadequacy and food insecurity.

In 2019, 29 Ontario public health units utilized the Ontario Nutritious Food Basket (ONFB), along with local rental costs and various income scenarios to monitor food affordability and income adequacy. The data from Middlesex-London demonstrates that people with low incomes cannot afford to eat healthily after meeting other essential needs for basic living. Please find attached the 2019 Middlesex-London Nutritious Food Basket survey results, included within Report No. 070-19, "*Monitoring Food Affordability and Implications for Government Public Policy*".

With the release of the new Canada's Food Guide (CFG) in 2019, the types and proportions of food included in the most current [National Nutritious Food Basket](#) (2008), the basis for the 67 food items in the Ontario Nutritious Food Basket (ONFB), have become outdated. Additionally, the In-store Food Costing Form for the ONFB (Appendix A in the [Nutritious Food Basket Guidance Document](#), 2010) has become outdated with the defined 'preferred purchase unit' invalid for many food items.

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The ONFB Protocol and Guidance Document, previously developed by the Ministry of Health and Long-Term Care, has also been the basis for protocols used by other provinces and territories. There is currently no indication that the Ontario Ministry of Health will be involved in future development or revision of a protocol. Health Canada leadership would help to facilitate consistent and effective provincial/territorial and local monitoring of food affordability; updating the food list in the National Nutritious Food Basket to reflect recommendations in the 2019 Canada's Food Guide and a national food costing protocol would provide consistency in measurement across Canada.

We thank you for your consideration of this matter and your ongoing commitment to the health and well-being of all Canadians.

Sincerely,

Trish Fulton, Chair
Middlesex-London Board of Health

Attachment – Report No. 070-19, “Monitoring Food Affordability and Implications for Government Public Policy and Action”