



Employment and Social Development Canada

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RE: Consultation on *Building a pan-Canadian school food policy*

To Whom It May Concern:

On behalf of the Canadian fresh fruit and vegetable industry, we welcome the opportunity to provide comments to Employment and Social Development Canada's consultation *Building a pan-Canadian school food policy*.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate, spanning the entire produce industry. The Association's members include major growers, shippers, packers and marketers; importers and exporters; transportation and logistics firms; brokers, distributors and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent over 830 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

As part of our consumer education efforts, CPMA leads the *Half Your Plate* initiative, in partnership with the Heart and Stroke Foundation, the Canadian Public Health Association and the Canadian Cancer Society, to improve fruit and vegetable consumption in Canada to support better overall health. CPMA has also developed a youth component to the *Half Your Plate* program, the *Freggie Children's Program*, with an in-school curriculum designed to encourage children to eat fruits and vegetables as part of their healthy lunches and snacks at school and to help them understand the benefits of making healthy food choices.

Comments

CPMA supports the targets of the Food Policy for Canada to promote long-term social, environmental and economic sustainability of the Canadian food system and increase Canadians' consumption of safe and nutritious food. Even prior to recent inflationary pressures on the cost of food, close to 80% of Canadians were not eating enough fruits and vegetables, resulting in an economic burden calculated at almost \$4.4 billion annually (*Krueger Report*, 2017). With food insecurity on the rise across Canada, we know this figure is undoubtedly getting worse.

In addition to the efforts being undertaken by the Association as noted above, CPMA members across the fresh fruit and vegetable supply chain, from grower-packer-shippers to wholesale to retail and others, are active in existing school food programs across the country. In a 2022 member survey, 68% of respondents indicated that they support school nutrition programs, evenly split between local and regional programs.

Canada is currently the only G7 country without a national school food program. CPMA strongly supports the development of a National School Food Policy and national school nutritious meal program as critical investments in the health of our children and our broader communities.

Comments on discussion themes for a pan-Canadian policy based on shared objectives

- The Food Policy for Canada has at its core the objective of working towards the following vision for the future of food in Canada: *All people in Canada are able to access a sufficient amount of safe, nutritious, and culturally diverse food. Canada's food system is resilient and innovative, sustains our environment and supports our economy.* CPMA is strongly supportive of this vision for our food system and emphasizes that ensuring that all Canadians can access nutritious food, no matter where they live, must be a top priority for the federal government.

Improve access to school food and mitigate financial barriers

- Food insecurity is widely recognized to have significant negative consequences on a person's health, both mental and physical. By contrast, increasing consumption of fresh fruits and vegetables has been linked to reduction in death due to chronic illnesses, reduction in the risk of cancer, and reduced risk for heart disease and stroke. Therefore, it is clear that promoting access to these nutritious products in all regions of the country can contribute significantly to the health and well-being of our communities.
- CPMA emphasizes that affordability and accessibility are mutually inclusive and should not be separated in government policy. Affordability should not equate to "cheap or inexpensive" food, which risks driving down food costs to a level that is economically unsustainable for producers, with negative consequences for Canada's food security. Instead, the federal government should create the opportunity for Canadians to have the appropriate financial means or assistance to afford and access nutritious food, no matter where they live.
- The pan-Canadian school food policy and a national school food program should include a core focus on mitigating any financial barriers to participation for children from coast to coast to coast. To achieve this goal, while also preventing stigma associated with participation and encouraging all children, regardless of income, to reap the benefits of eating healthy food at school, CPMA supports school food programs being open to all children, with a sliding-scale cost model based on household income. We are also strongly supportive of ensuring that school food programs are free at the point of participation and would emphasize that any application processes for parents should be designed to make participation as easy as possible.
- It is important to note that an overly complex sliding-scale model has the potential to create unintended administrative burden. The pan-Canadian school food policy should provide the necessary flexibility to allow provincial/territorial governments and local administrators to implement a sliding-scale model in a manner that best meets the needs of their communities.

Prevent stigma

- The pan-Canadian school food policy can and undoubtedly should serve to strengthen food security across the country and improve health outcomes for communities with higher levels of food insecurity. It is also important to emphasize that increasing consumption of nutritious foods at school benefits all children, regardless of income. Therefore, CPMA agrees strongly that the policy should be designed and implemented with a deliberate focus on preventing any stigma being attached with participation in school food programs.
- As noted above, CPMA supports school food programs being available to all children, with a sliding-scale cost model based on household income, and with a strong emphasis that there should be no cost to the child at the point of participation.
- Finally, the current patchwork of school food programs across Canada often relies upon charitable donations of product or funding, which may contribute to stigmatizing student participation. CPMA emphasizes that the pan-Canadian school food policy must put in place a framework for school food programs backed with sufficient funding and resources from all levels of government, so that these programs are viewed, rightly, as critical investments for all in our school communities rather than as charitable endeavours.

Enhance nutrition and promote lifelong healthy practices

- CPMA strongly urges the government to prioritize the enhancement of nutrition and the promotion of healthy eating practices as a core objective of the pan-Canadian school food policy and any national school food program, and to promote the consumption of fresh fruits and vegetables as critical to meeting this objective.
- Fruits and vegetables are an important source of vitamins, minerals, and fibre. As noted above, increasing consumption of fresh fruits and vegetables has been linked to reduction in death due to chronic illnesses, reduction in the risk of cancer, and reduced risk for heart disease and stroke. Higher fruit and vegetable consumption in childhood is also associated with a decreased risk of adult chronic disease and obesity (Maynard et. Al, 2003 & Maynard et. Al, 2005).
- Despite these health benefits, Statistics Canada has found that, year over year, Canadians are eating fewer vegetables and fruits. The latest Statistics Canada numbers suggest that almost 80% of Canadians over age 12 are eating less than five servings per day ([Statistics Canada](#), 2022).
- It is important to note that Statistics Canada has found that Canadians who reported living in food secure households were more likely to report consuming fruit and vegetables five or more times per day than those in moderately or severely food insecure households ([Statistics Canada](#), 2019). Recent food price inflation has put further strain on household budgets and increased food insecurity across Canada, which is likely to have negative consequences on Canadians' health.
- CPMA is strongly supportive of the recommendation in *Canada's Food Guide* that Canadians fill half their plates with fruits and vegetables, which is reflective of the critical contributions to health and well-being made by these products. The *Food Guide* can and should serve as a foundational resource for ensuring that the pan-Canadian school food policy and school food programs across the country are based in sound nutritional science.

- In our 2022 CPMA member survey, the majority of respondents currently supporting school nutrition programs indicated that these programs specifically promote the consumption of fresh fruits and vegetables. The Government of Canada should build on these existing efforts to promote the consumption of fresh produce to support better health outcomes and student learning, and ultimately reduce health care costs across the country.
- In addition, CPMA strongly urges the Government of Canada to work with the provinces and territories to include the promotion of food literacy and food preparation skills as a core component of the pan-Canadian school food policy, to forge a connection for children between nutritious food programming at school and making healthy food choices at home for years to come. Research has shown that food and cooking programs have a positive impact on the behaviours and attitudes towards food and nutrition by kids, such as higher self-efficacy, higher consumption of fruits and vegetables, increased nutrition knowledge, and more (Thoman & Irwin, 2011). Existing successful programs such as Agriculture in the Classroom and the [Freggie Children's Program](#) should be supported to expand their reach to students across the country.

Ensure a flexible approach that leaves room for local adaptation

- While food insecurity is on the rise across Canada, it is important to note that the challenges of food insecurity vary across different communities and are complex and multi-faceted.
- For example, Indigenous, Black, northern and remote communities are more likely to experience food insecurity. Canadians living in rural and remote areas are less likely to consume at least five daily servings of vegetables and fruit than people living in urban settings. In fact, even prior to the recent rise in food prices, in a September 2020 Nielsen survey, more than 10% of respondents living in rural areas indicated that their intake of fruits and vegetables had decreased as a result of the COVID-19 pandemic.
- As noted in the Government of Canada's discussion paper, existing school meal programs vary widely across the country, differing in funding and cost models, approach and objectives and food delivered. This patchwork currently only reaches about 21% of school-age children, with significant gaps in coverage depending on the jurisdiction.
- The current patchwork of existing programs was also reflected in the responses to our 2022 CPMA member survey, with more than 58% of respondents indicating that the programs they support are administered by an NGO and another 26% reporting supporting programs administered by a school board. It is also important to note that only 16% of respondents indicated that the programs they support are administered by a provincial government.
- In order to successfully advance a pan-Canadian school food policy and a national school food program that serves the needs of all children across Canada, the Government of Canada should work with the provinces and territories to expand government resources dedicated to the funding, infrastructure and/or administration of school food programs.
- At the same time, CPMA strongly agrees that a one-size-fits-all approach will not meet the needs of all children or communities. Instead, the pan-Canadian school food policy should provide a clear

framework of core objectives and measurable outcomes with the flexibility for local communities to achieve these outcomes in a manner that best reflects their particular geographic and demographic realities.

Offer culturally appropriate programming that is mindful of dietary requirements

- CPMA strongly agrees that the pan-Canadian school food policy should offer culturally appropriate programming that is mindful of dietary requirements. It is also important to note that not providing culturally appropriate food or accounting for dietary restrictions can create stigma and hinder program participation.
- We would also emphasize that school food programs can offer children from different cultural communities an opportunity to learn from each other and to try new nutritious products, all of which can contribute to a lifelong healthy relationship with food.
- CPMA strongly recommends that the pan-Canadian school food policy should take an outcome-based approach that allows local communities to meet the policy's objectives in a manner that best meets the needs of their students.

Ensure accountability and governance

- CPMA strongly agrees that the pan-Canadian school food policy should be underpinned by a framework of clear, evidence-based objectives and outcomes that are backed by consistent data collection and reporting to assess progress.
- The policy should also encourage ongoing sharing of information and lessons learned among school food programs to support the development of innovative solutions and the implementation of best practices.

Supporting local and sustainable food systems and economies

- In addition to the food security benefits of providing healthy food to children at school, the pan-Canadian food policy has the potential to provide multiple community benefits in terms of encouraging local production and fueling employment and broader economic development. At the same time, we must note that, while we are fully supportive of Canadian producers, and growing our agricultural production in Canada, it is imperative that school food programs provide a variety of nutritious and affordable food to children across Canada year-round, not just during our growing season, and not just providing foods we grow or produce in Canada.
- The pan-Canadian food policy must include as a core objective taking an integrated, inter-governmental approach to ensure adequate access to culturally appropriate fruit and vegetables, including in northern, rural, and remote areas. All food sectors such as exporters, importers and distributors therefore have an important role to play in supplying school food programs with safe, nutritious food, year-round, in all locations of the country.
- In our 2022 CPMA member survey, respondents indicated that donation of product was the most common form of support (63%), followed by paid provision of product (32%) and financial support (26%). This support was mostly given on a weekly basis (53%) or a monthly basis (32%).

- CPMA emphasizes that, in order to advance its goals of supporting local food systems and economies, as well as reducing stigma associated with program participation, the Government of Canada should work to ensure that the pan-Canadian food policy and any national school food program do not rely heavily on charitable donations of product, but are instead backed by sufficient government resources to secure a consistent supply of healthy food, and create real opportunities for beneficial partnerships between food producers/suppliers and program administrators that ensure the economic viability of supplying product to school food programs.
- One CPMA member also reported supporting a provincially funded school nutrition program through the provision of logistics and procurement services. Transporting perishable food, including healthy fresh fruits and vegetables, can be extremely expensive, particularly in rural, remote and northern communities, and is made more complicated by the need for infrastructure to support the maintenance of the cold chain.
- Increasing overall access to a variety of nutritious food for all children across Canada, year-round, means supporting the entire agri-food value chain, including support for innovation in areas such as storage, distribution and transportation. In considering the design and implementation of the pan-Canadian school food policy, the Government of Canada should partner with industry and other stakeholders to leverage existing expertise in logistics and procurement to support the effective, efficient supply of fresh and perishable products to school food programs.

Other Comments

CPMA is hopeful that the recent success of the federal, provincial and territorial governments in negotiating agreements to support early learning and child care can offer a path forward towards an effective pan-Canadian school food policy and a national school food program.

We thank you for taking the time to review our comments and would be pleased to meet with you for further discussion or to answer any questions you may have. CPMA and Canada's fresh produce industry are keen to partner with government to ensure that the pan-Canadian school food policy achieves its core objectives and improves health outcomes for children from coast to coast to coast.

Regards,



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Canadian Produce Marketing Association