

January 17, 2019

## Recommendations of Dietitians Canada for Nutrition North Canada

Dietitians promote health and wellbeing through expertise in food and nutrition. Dietitians of Canada (DC) members practice in many settings including hospitals, primary care, public health, food industry and retail, and academic and research settings. We have provided evidence-based food and nutrition recommendations in response to Government of Canada consultations including the Healthy Eating Strategy for Canada, A Food Policy for Canada and Canada's First Poverty Reduction Strategy. We have followed and provided feedback on developments with Nutrition North Canada (NNC) since its inception.

We acknowledge the changes to NNC announced last December, including additions to the eligible foods list, increases to the retail subsidy and a new highest subsidy rate and plans to establish Inuit-Crown Partnership Committee Working Groups. We understand these actions are meant to achieve meaningful progress in the lack of access to healthy food for the most vulnerable in northern and remote communities.

We also acknowledge the focus of NNC as a retail subsidy program and that the program does not specifically target households experiencing food insecurity due to their dire financial circumstances. While the NNC program cannot address food insecurity on its own, the serious and persistent issue of high prevalence of food insecurity experienced in Canada's remote and northern communities – many of which are NNC-eligible and home to Indigenous Canadians – demands effective cooperation and commitment achievable through collaborations such as the proposed Inuit-Crown Partnership Committee. Research has demonstrated reductions in household food insecurity through social policies to improve the material circumstances of vulnerable households. In Canada, being on social assistance still poses an extremely high risk for experiencing food insecurity. Social assistance recipients are more likely than not to be food insecure, suggesting that these programs are not designed in ways that enable recipients to meet their basic needs. While the NNC subsidy is helping to offset the high cost of transportation of perishable foods to eligible communities, the impact of the program on affordability of healthy food for households with very low incomes remains a concern.

Effective solutions to food insecurity in Canada's remote and northern communities must address all causes of the inadequate access to food due to financial constraints, both high cost of food and low incomes. Progress on northern food insecurity will be achieved when the unique challenges of the individuals and communities are considered and addressed. We encourage NNC to adopt recommendations of representative groups and engage directly with local governments, community leaders and health service representatives.

The recommendations of Dietitians of Canada, for action by NNC and Intergovernmental and Northern Affairs and Internal Trade, as the responsible Ministry, are based on consultation and discussion with dietitians working in Yukon, Northwest Territories and Nunavut.

**1. Mandate full transparency and accountability of NNC.**

In its 2014 report, the Office of the Auditor General of Canada made recommendations to address concerns that the subsidy was of direct benefit to consumers, not retailers. We believe a new accountability process and report is needed to verify that concerns have been addressed and to build support for and trust in NNC.

In addition to the Auditor General, full transparency and accountability has been repeatedly called for by groups such as Inuit Tapiriit Kanatami (ITK), the Nunavut Tunngavik Inc (NTI), Assembly of First Nations (AFN) and others. We therefore support the new recommendation for an Inuit-Crown Partnership Committee as an opportunity for full transparency and accountability. While the goal of NNC is to make nutritious foods more affordable and accessible, the means for achieving these outcomes must be sufficiently flexible and responsive to accommodate local needs and preferences to the satisfaction of First Nations, Inuit and Métis representatives. We know, from analysis of 2014 CCHS data by [PROOF](#), prevalence of household food insecurity in Nunavut and Northwest Territories has risen to the highest levels observed since monitoring began in 2005.<sup>1</sup> The proportion of children living in food insecure households in Nunavut and Northwest Territories is 60% and 29% respectively. As announced in the launch of [Canada's First Poverty Reduction Strategy](#), household food insecurity prevalence will be monitored as part of the evaluation of impact and strategy success. Findings of this evaluation will be equally important in measuring the impact of the NNC program on household food insecurity and determining the program's future.

**2. Continue to support healthy eating and food literacy through health promotion activities in all vulnerable communities.**

Continue federal support for health promotion, nutrition initiatives and access to dietitians' services through NNC and Health Canada across the North. Coordinate education initiatives with retail marketing to promote healthy choices and restrict marketing of foods and beverages directed to children.

**3. Support Indigenous Canadians traditional food ways for long-term program sustainability.**

As mentioned earlier, dietitians feel strongly that an important priority of the program impact the affordability of healthy food for households with very low incomes. While many Northerners welcome the subsidy on market or store-bought food, traditional food continues to be both nutritionally and culturally essential. Research has shown that traditional foods, and the sharing of traditional foods, provide a foundation for better nutrition and well-being as well as impacting food security for First Nations people.<sup>2</sup> Although remote geographical locations can increase the cost and availability of healthy traditional and store-bought foods, living in these communities allows Northerners to remain connected to their land and traditional food systems.

In the 2016 community consultations, barriers to accessing traditional food were a widespread concern. Although commercially produced country food is technically subsidy-eligible, the absence of licensed processing facilities in the North means few subsidy dollars go towards improved access to local food. Other significant barriers that restrict access

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<sup>1</sup> Tarasuk, V, Mitchell, A, Dachner, N. (2016). Household food insecurity in Canada, 2014. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from <https://proof.utoronto.ca/>

<sup>2</sup> First Nations Information Governance Centre, National Report of the First Nations Regional Health Survey Phase 3: Volume Two, (Ottawa: 2018). Published in July 2018.

to traditional food include provincial, territorial and federal regulations that restrict selling and serving these foods through local markets.

We acknowledge the new funding for harvester support programs. At the same time, we question the appropriateness of the amount of the funding for harvester support in comparison to NNC's annual budget given the high nutritional and cultural value of these foods to Northern residents – approximately \$8M of the \$105M annual budget. Subsidies for harvesting equipment, such as fishing nets, tents, shells, and fuel were identified during the consultations. Other identified needs include support for community hunts and community freezers, and for family-to-family food shipments between communities. Greater flexibility in program funding, to allow communities to determine their own priorities, such as developing community gardens and expanding hunter support programs to more communities, has also been called for.

Again, dietitians believe it is critically important that NNC adopt recommendations of representative groups and engage directly with local governments, community leaders and health service representatives to find acceptable solutions to the barriers that restrict access to nutritionally and culturally essential traditional food.

**4. Evaluate the impact of changes to the eligible foods list and subsidy rates on affordability of foods and family-friendly items in northern and remote communities.**

Recent changes to the eligible food lists are noted and commendable, especially the inclusion of family-friendly items, such as diapers and non-prescription drugs. In the community consultations, calls for assistance with the high cost of items such as personal and household hygiene products such as toothpaste and cleaning products were widespread. Changes to subsidies for frozen fruit and vegetables, milk, infant food and infant formula is acknowledged as good progress too. However, food prices in these communities continue to be disproportionately high compared to food prices in the rest of Canada. We suggest that regular food costing be implemented using either the Revised Northern Food Basket or a variation of the Nutritious Food Basket for typical compositions of Northern households and application of the information by NNC. In so doing, building confidence in NNC benefit to Northern residents while alleviating some challenges with access to nutritious food.

**5. Improve program responsiveness to changing community realities.**

Noted are changes to the rules regarding eligibility for communities that become isolated due to lack of surface access and incur price shocks with unanticipated changes and the annual review of all communities' supply chain. These are positive steps forward. The requirement for a 4 week isolation period is excessive in our view and could create real and significant hardships for residents cut off from regular access to healthy food. Also, many communities are accessed by poor roads with routine short and seasonal periods of isolation. We therefore recommend that NNC devise a process for more timely response to communities experiencing challenges with food access in the short term.

Dietitians of Canada offers the above recommendations to the NNC program and Intergovernmental and Northern Affairs and Internal Trade, as the responsible Ministry. At the convenience of the Minister, we are available to provide further input and dietitians' perspective on the public health challenges due to limited access to nutritious foods and other necessities.

**Submitted on behalf of Dietitians of Canada, by:**



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About Dietitians of Canada

Dietitians of Canada is the national professional association for dietitians, representing 5,000 members at the local, provincial and national level. As the voice of the profession, Dietitians of Canada strives for excellence in advancing health through food and nutrition.