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Constituent Societies

Association of Ontario
Health Centres (AOHC)

Association of Public Health
Epidemiologists in Ontario (APHEO)

Association of Supervisors of
Public Health Inspectors of Ontario
(ASPHIO)

Canadian Institute of Public Health
Inspectors - Ontario Branch (CIPHIO)

Community Health Nurses'
Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public
Health Dentistry (OAPHD)

Ontario Association of Public Health
Nursing Leaders (OAPHNL)

Ontario Dietitians in Public Health
(ODPH)

Ontario Society of Physical Activity
Promoters in Public Health
(OSPAPPH)

Laura Pisko, Director
Health Improvement Policy and Program Branch
Ministry of Health
396 University Avenue | Suite 2100
Toronto | ON | M7A2S1

November 27, 2019

Dear Ms. Pisko,

I am writing on behalf of the Ontario Public Health Association (OPHA) to provide feedback on the proposed amendments to the Food Premises Regulation 493/17 under the Health Protection and Promotion Act (proposal number 19-HLTC028).

The OPHA supports the structural exemptions of the proposed amendments to the Food Premises Regulations provided that they only apply to food premises serving low risk foods. In addition, the exemption to having to have a trained food handler on-site should only apply to premises which serve pre-packaged foods.

We concur with the Association of Supervisors' of Public Health Inspectors of Ontario that a clearer definition of low risk foods and specific guidelines are required along with a risk assessment tool to ensure this regulation is applied in a consistent manner among health units across the province.

We recognize that the proposed amendments may help to alleviate some of the challenges operators of food premises that serve low-risk foods face with respect to hand-washing facilities, sanitizing equipment, and food handler certification and the financial and logistical costs associated with these requirements. That being said, it is important to have handwashing facilities available where food is handled, prepared or pre-packaged in order to prevent foodborne illness. We also support the Canadian Institute of Public Health Inspectors – Ontario recommendation that a food handler program be developed specially for groups such as non-profit organizations and charities that serve food to people in need.

Although the proposed amendments may make it easier for such groups, they may also unintentionally encourage these organizations to predominantly supply their patrons with foods of low nutritional value, such as pre-packaged foods higher in sodium, free sugars, and saturated fat. Given that adults of lower socioeconomic status are less

likely to have adequate intakes of vegetables and fruits¹ and that adults experiencing food insecurity are more vulnerable to chronic conditions with dietary risk factors such as diabetes, heart disease, and hypertension², it is imperative that food donation organizations and community feeding programs are able to safely offer health-promoting foods, such as vegetables and fruits.

Should the proposed amendments be accepted, the OPHA encourages the ministry to provide clear guidance to food premises serving only low-risk foods on which foods to prioritize and minimize. Priority should be given to foods consistent with the healthy eating recommendations of the 2019 Canada Food Guide. This includes encouraging food premises to offer vegetables and fruits, whole grains, and plant-based proteins while minimizing foods higher in nutrients of concern, such as sodium, free sugars, and saturated fat.

As noted by the Ontario Dietitians in Public Health, community feeding programs provide only temporary relief of hunger and are not a solution to food insecurity, as food insecurity is the result of inadequate or insecure access to food due to financial constraints.² OPHA encourages the ministry to work across government to develop strategies that adequately address the root causes of food insecurity in Ontario.

The OPHA looks forward to working with the ministry on this and other important public health initiatives.

Thank you for your consideration of our comments.



Pegeen Walsh, Executive Director

More about the Ontario Public Health Association

The OPHA is a member-based non-partisan, non-profit organization that brings together a broad spectrum of groups and individuals concerned about people's health. Established in 1949, the OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research, and knowledge exchange. Our membership represents many disciplines from across multiple sectors. OPHA is also home to Nutrition Connections (formerly the Nutrition Resource Centre) which advances nutrition knowledge and collaboration and supports health professionals, community organizations, educators, researchers, and others working in food and nutrition to build capacity, connect, and share information.

¹Cancer Care Ontario and the Ontario Agency for Health Protection and Promotion. The burden of chronic diseases in Ontario: key estimates to support efforts in prevention [Internet]. Toronto: Queen's Printer for Ontario; 2019. Available from: <https://www.publichealthontario.ca/-/media/documents/cdburden-report.pdf?la=en>

²PROOF: Food Insecurity Policy research. The impact of food insecurity on health. Toronto: PROOF; 2016. Available from: <https://proof.utoronto.ca/resources/fact-sheets/#health>