

December 22, 2023

Consultation, Canada Disability Benefit Regulations
c/o Office for Disability Issues
Employment and Social Development Canada
105, rue de l'Hôtel-de-Ville, 1st floor, Bag 62
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By email: CDB@hrsdc-rhdcc.gc.ca

To whom it may concern:

On behalf of the Peterborough Food Action Network (PFAN), and the Council for Persons with Disabilities (CPD), we would like to express appreciation for the passage of the *Canada Disability Benefit Act* and current efforts underway to engage the public in the development of its associated regulations. In particular, the emphasis on collaborating with persons with disabilities is a welcome and appropriate part of the process, as is adherence to the definition of disability as outlined in the *Accessible Canada Act*, which we hope will universally apply to all federal policy.

A key objective of CPD is “to liaise with all levels of government and agencies on policies and legislation affecting persons with disabilities”. The work of PFAN focuses on “building community food security as part of local poverty reduction efforts”. As such, both organizations share a common interest in improving the lives of persons with disabilities through meaningful change, including income-based solutions.

CPD and PFAN recognize that persons with disabilities in Canada disproportionately experience household food insecurity, which is defined as, “inadequate or insecure access to food due to financial constraints.”¹ Food insecurity impacts the wellbeing of children and families, and places people at greater risk for poor physical and mental health outcomes, which may in turn exacerbate an existing disability or result in a complicating condition. In short, food insecurity presents an additional barrier with which many persons with disabilities have to contend on a daily basis.

Data from the report, [Addressing Food Insecurity in Peterborough: An Urgent Call to Action](#), recently released by Peterborough Public Health, provides some illustrative local examples. Scenarios 6, 8, and 9 on page 18 all point to the challenges faced by persons with disabilities on fixed incomes in meeting even the most basic of expenses. Indeed, Scenario 6 provides a striking example of how a one-person household accessing the Ontario Disability Support Program (ODSP) is spending 111% of its monthly budget on rent and food alone.²

A similar pattern is reflected in the data provided by the Peterborough and District United Way's Living Wage Report 2022, [The Gap](#). The report indicates that single adults earning the maximum eligible benefit for ODSP were at that time earning 44% of a living wage, and were \$1,365.92 short of covering their basic monthly expenses.³ Given the continued impact of inflation on the cost of food and housing, it is likely that this disparity will be even greater when calculated for 2023.

¹ Tarasuk V, Li T, & Fafard St-Germain AA. (2023). Household food insecurity in Canada, 2022. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from: proof.utoronto.ca/

² Peterborough Public Health. (2023). Addressing Food Insecurity in Peterborough: An Urgent Call to Action. Retrieved from: [Addressing Food Insecurity in Peterborough \(peterboroughpublichealth.ca\)](#)

³ United Way Peterborough and District. (2022). Living Wage Report: The Gap. Retrieved from: [Living Wage V3 Online.pdf \(uwpeterborough.ca\)](#)

The above examples are brought to life by members of CPD with lived experience of disability who generously shared the following insights regarding their own situations:

“I think the Canadian disability benefit fund would be helpful for all of us because odsp [sic] does not give us enough money to make healthy food items and sometimes go out and do other things with friends and family . . . I hope that the Canadian government will help us with the issue at hand.”

“There is no question that the Canada Disability Benefit Act will be a major boost to individuals living on fixed incomes. As a person working and living on ODSP, I still find it difficult to balance my income in a way that allows me to pay my bills and rent and still make healthy choices at the grocery store . . . It often seems like it might be cheaper to eat at a fast food restaurant then buy the necessary items to cook a healthy meal.”

As clearly indicated by the above data and lived experiences, “healthy living comes with a price tag”, but it is something worth investing in. The Canada Disability Benefit can help to address these income shortfalls by enabling persons with disabilities to live with greater dignity and access to the essentials that support their wellbeing, including healthy food.

CPD and PFAN very much hope that the federal government will take this information into account when developing the regulations for the *Canada Benefit Disability Act* and, in particular, any regulation that relates to an established benefit amount. This process presents an important opportunity to use an income-based solution to meaningfully improve the lives of working-age persons with disabilities.

Thank you for taking a proactive approach to giving the appropriate level of thought and care to this process. By establishing an adequate benefit amount from the outset, and creating an eligibility process that takes a dignified rather than punitive approach, the potential exists for immediate positive change for persons with disabilities.

Sincerely,

Lauren Kennedy, MScFN, RD, CDE, Registered Dietitian, Chair, Peterborough Food Action Network

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On behalf of the [Peterborough Food Action Network](#) and [Council for Persons with Disabilities](#)