



The Salvation Army
Canada and Bermuda Territory

Response to request for
comments on the draft report

Taking Stock: Reducing Food Loss and Waste in Canada

Environment and Climate Change Canada
Environmental Protection Branch
Waste Reduction and Management Division



March 2019

We have read, with interest, the draft report titled ***Taking Stock: Reducing Food Loss and Waste in Canada*** and welcome the opportunity to provide comments regarding food loss and food waste in Canada.

In Canada, we are fortunate to have access to an abundant supply of quality, nutritious food. Unfortunately, however, too many Canadians struggle to make ends meet, and some of them turn to food banks for assistance in meeting their needs.

Thanks to the generous support of individual, small business and larger corporate donors, as well as community-minded groups such as churches, service clubs and sports teams, we are able to provide healthy, safe and nutritious food to more than 1 million people per year.

The Salvation Army is actively involved in food recovery and food redistribution through its network of more than 250 community and family services offices, community-based meal programs and emergency shelters across Canada. We operate in large urban centres, as well as small, rural and remote communities.

We are members of **Food Banks Canada** and several of the provincial food bank associations.

In addition, we have collaborative relationships with:

- **FoodRescue.ca**
- **Link2Feed**
- **7-11**
- **Sobeys**
- **Walmart**
- **Loblaws**
- **Metro**

Our Food Recovery and Distribution Efforts

In 2017-2018, we have:

- assisted **1,236,000 people** with food, clothing and other practical assistance;
- served **3.2 million meals** in shelters and community feeding programs;
- served another **223,000 meals** in school breakfast programs;
- helped **269,999 people** at Christmas with food hampers and toys;
- received more than **\$1.4 million** from **Food Banks British Columbia** to purchase refrigeration vehicles and equipment to enhance the capacity of our food banks in British Columbia to provide healthy, nutritious food to people in **17 communities** throughout the lower mainland and northern British Columbia.

In 2019 alone, we have already rescued more than **1,800 kgs (4,000 lbs) of food**, valued at **\$9,428** from 28 businesses in urban centres across Ontario thanks to **FoodRescue.ca**.

Our Responses to Your Questions

1. ***What is currently being done to reduce food loss and waste in Canada?***

A key strength in this area is the strong collaboration that already exists throughout the food supply chain between the private sector (e.g. food wholesalers and distributors, retailers and the food services industry), the not-for-profit sector (e.g. national and provincial food bank associations, local, community-based food banks, churches, service clubs and sports teams) and the consumer public (e.g. through retail, workplace and charity-led food drives).

The Salvation Army has benefitted greatly from surplus food donations from large corporate wholesalers and distributors, perishable food recovery programs established by major retailers and donations from small and medium local businesses.

We also benefit from our membership in provincial and national food bank associations which provide access to educational resources and best practices, donated food with corporate donors, grants and contributions to enhance the capacity of small community-based food banks to transport, store and distribute food.

2. ***What are key gaps and opportunities for improvement?***

In our experience, the key gaps are:

- confusion about food labelling and whether and when it is safe to consume, donate or distribute food that has passed its best before date;
- concern among smaller retailers and the food services industry about potential liability for donated food;
- food bank association membership models can create barriers to access to funding sources.

3. ***Where can we go from here?***

As stated at the outset, in Canada, we are fortunate to have access to an abundant supply of quality, nutritious food. We are also fortunate to have strong and effective collaboration between governments, industry, household consumers and the not-for-profit and charitable sector. Our remaining comments focus on those recommendations in ***Taking Stock*** where our own experience echoes or validates the observations made and recommendations set out in ***Taking Stock***.

Recommendations

We support the recommendations set out in *Taking Stock* to:

1. Educate food retailers and household consumers about best before/expiry dates on food labelling to reduce food waste.

Although we do not have verifiable data on potential donations lost and food wasted because of confusion over date labelling, anecdotally we note that some of our own volunteers and employees are concerned about distributing food that has reached its best before date.

Ongoing education to increase understanding of date labelling and support safe food recovery and distribution practices could assist to reduce food loss and food waste and enhance the recovery of healthy, safe and nutritious food donations.

2. Increase education for donors on the regulatory framework, liability protection, date labels and best practices for safe handling of donated food.

We benefit from strong partnerships with provincial and national food bank associations, which in turn have fostered strong relationships with the major food distributors and retailers – **Loblaws, Metro, Sobeys** and **Walmart**.

We agree that more work can be done to educate small and medium retailers, and those in the food service industry, about existing legislative protection for food donors.

3. Make infrastructure investments to enhance the capacity of the charitable sector to source food donations and transport, store and distribute food safely.

Relatively modest financial investments can have a significant impact on the ability of charities and non-profits to recover surplus food and distribute it to those in need.

For example, recent investments in **FoodRescue.ca** have permitted the organization to purchase insulated food bags to allow for safe transport of donated food from food services industry participants to distributors, and thereby increase the number of donations it can receive.

In 2017-2018, The Salvation Army received **\$1.4 million** from **Food Banks British Columbia** to purchase refrigerated vehicles and other equipment to enhance the capacity of food banks to serve their communities.

In addition to physical infrastructure such as refrigerated vehicles, insulated food bags and refrigeration equipment, investments that would permit the development of information systems to allow food bank associations and local food banks to track food donations needed, received, distributed and discarded would enhance the capacity of the sector to serve those who rely on their assistance to make ends meet.

4. Consider simplifying or enhancing tax incentives for food growers, producers and retailers who make in-kind donations of food to charities.

Although corporations may make gift-in-kind charitable donations out of their inventory, the administrative burden of establishing the fair market value of small quantities of food that may be safe for consumption without meeting retail standards may outweigh the perceived benefit of donating such food to charitable food recovery organizations, for both the food grower/producer and for the charity.

We recommend exploring options to simplify the calculation of fair market value in such circumstances, both to reduce the administrative burden and to encourage the donation of fresh produce or other food that might not meet retail standards. For example, **Food Bank Canada's** value of \$5.70/kg (\$2.60/lb) might serve as a proxy for the fair market value of donated food up to a certain weight or dollar value.

5. Educate the food industry and consumers about the environmental and economic impact of food loss.

While we support these goals, we would not want to lose sight of the importance of food recovery and distribution initiatives, which, in addition to reducing the environmental and economic impact of food loss, provide a number of positive intangible benefits such as:

- raising awareness of poverty and hunger in local communities;
- fostering connections between local businesses, non-profit and charitable organizations, schools and larger for-profit enterprises;
- reduced social isolation through the opportunity to connect with others in the community and volunteer in local food banks and meal programs.

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