

Recommendations on Bill C-22, the *Canada Disability Benefit Act* to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA)

In keeping with the spirit of the *Canada Disability Benefit Act*, and as members of the Defend Disability Coalition, this brief from the Daily Bread Food Bank provides insights and data findings rooted in evidence-informed research to support the recommendations on how the framework legislation can be improved in the Bill, and additional and important design considerations for the Act's future regulations. As members of Defend Disability, we echo these three recommendations:

Recommendations

Proposed amendments to Bill C-22, the *Canada Disability Benefit* framework legislation

- **Recommendation 1:** Ensure a statutory minimum amount of the Canada Disability Benefit in Bill C-22, to ensure it will raise people with disabilities at least thirty percent above the Market Basket Measure poverty lineⁱ. This will account for the extra costs of living with a disability and raise people with disabilities out of deep poverty.

Design considerations for future regulations:

- **Recommendation 2:** In order to ease access, individuals receiving provincial and federal disability supports should automatically qualify for the Canada Disability Benefit.
- **Recommendation 3:** Ensure that the Canada Disability Benefit supplements provincial and territorial income support programs and engage with the provinces and territories to preclude the claw back of provincial and territorial income supports.

About Daily Bread Food Bank and the expertise informing our recommendations

The Daily Bread Food Bank welcomes the opportunity to provide input to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA) on Bill C-22, the *Canada Disability Benefit Act*.

Daily Bread Food Bank is a member-based organization whose mission is to collaborate with all to eliminate food insecurity and advocate for solutions to end poverty. As Canada's largest food bank, Daily Bread runs innovative programs to support individuals living on low incomes and experiencing food insecurity by distributing fresh and shelf-stable food and fresh-cooked meals to 126 member agencies and 189 meal programs across Toronto.

Daily Bread also publishes the influential *Who's Hungry* report – an annual survey that provides data and analysis about food insecurity and poverty in Toronto to all levels of government and sector stakeholders.

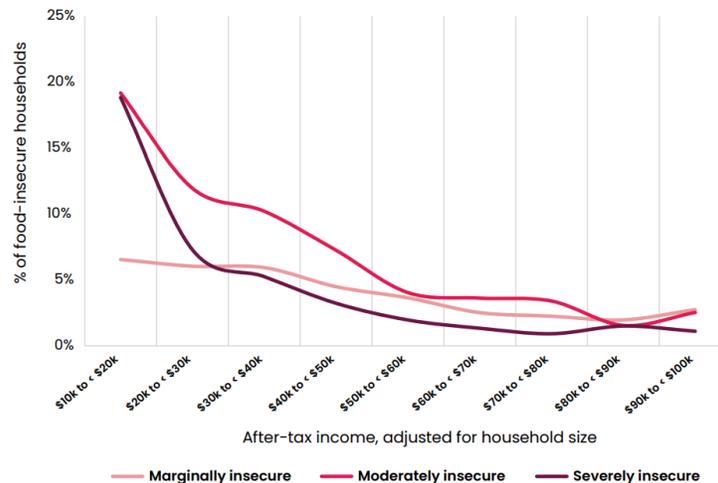
Insufficient income drives food insecurity

Over the past twelve months, there have been 1.99 million visits to food banks in Toronto. **This is the highest number ever reported in our city's history.** With record increases in the cost of living, combined with low incomes and soaring housing rents, demand will continue to grow.



While there are some issues relating to food access, the issue of food insecurity in Toronto is by and large driven by income insecurity. There is a strong correlation between income and food insecurity, with households with the lowest incomes most likely to experience food insecurity, and to experience more severe food insecurity.

Figure 8. Food insecurity by household income



Data Source: Statistics Canada, Canadian Income Survey (CIS) 2020.

In Toronto, the Ontario Disability Support Program (ODSP) provides a maximum of \$1,227 per month/\$14,724 annually for single individuals. This is barely more than half of Toronto's poverty line of \$2,060 per month/\$24,720 annually for single individuals. As a matter of fact, these rates are even lower than Toronto's deep poverty line, which is defined as having an income at or below 75% of the official poverty line, which is \$1,545 per month/\$18,540 annually for single individuals.

Therefore, people with disabilities face elevated rates and severity of food insecurity, due to insufficient social assistance rates that force them to sacrifice food security in order to pay for other competing necessities. People with disabilities are heavily dependent on food banks for their food supply.

While some may say, "why don't they just get a job?", many people with disabilities cannot work due to their condition. And for those who can work, they often face ableism when seeking employment and are unable to secure decent work due to systemic discrimination. These conditions function to keep them trapped in deep poverty and increase their likelihood of experiencing food insecurity.

What does the data tell us?

According to *Who's Hungry 2022*, 44% of clients reported a disability or health condition that limits their ability to perform daily tasks and is expected to last a year or more. Nearly 1 in 5 food bank clients (22%) reported their primary income source as ODSP.

Those receiving social assistance face some of the starkest levels of food insecurity. Almost half (47%) of clients whose primary income source was ODSP reported that they sometimes or often did not have enough food to eat in the past twelve months. 38% of clients who reported ODSP as their primary source of income were hungry at least one day a week in the past three months.

FIGHTING TO END HUNGER

Deep Poverty, our review of 12 years of data, found:

- 94.5% food bank users on ODSP, through the years, would be considered in deep poverty.
- Others who report having a disability but who are not on ODSP are most likely to be on OW.

In fact, in almost every year reviewed, those living with a disability comprised the majority of food bank users living in deep poverty (defined as the 75th percentile of the Market Basket Measure).

Year	Percentage of food bank client with disability living in deep poverty
2010	46%
2011	45%
2012	46%
2013	47%
2014	50%
2015	51%
2016	61%
2017	65%
2018	64%
2019	60%
2020	59%
2021	53%

In October 2022, Daily Bread also conducted a survey on ODSP rates, as yet unpublished, through the client voice *Click/Hear* program. We reached out to food bank clients who receive ODSP as their primary source of income and gathered insights of their day-to-day lives. We received an overwhelming number of comments about the food insecurity our clients are experiencing.

Here are some of the more powerful voices we heard:

- “I don’t remember the last time I ate an apple or salad. 15-20 years I haven’t bought anything new and I can’t afford it. I’m not mobile, I don’t move, only go to doctors’ appointments. I’m kind of a prisoner in my own apartment. Can’t afford to go anywhere.”
- “I never get out because I can’t even afford to buy a Timmy’s coffee and it makes me depressed. Sometimes I go for a walk at the Beaches and browse. I am so tired of browsing. I want to buy myself something. Even a new book.”
- “Thank you for calling me because I was going to give up my life. I was awake since 2 o’clock in the morning. I don’t know what to do, I was very stressed out. I talked to my daughter, and she said cancel everything. I canceled the TV, but I can’t cancel Wi-Fi. They increased Wi-Fi to twenty dollars. It’s too much money if I pay it, I won’t be able to eat and get my meds.”



- “I eat 1 or 2 meals a day. I can't afford 3 meals a day because of the cost. If it were not a food bank, I would not be able to make it, it would be 8-10 days without food per month. Groceries are expensive and because I'm visually and physically impaired I have no choice but to come by taxi from grocery stores. It costs me 20 bucks every time I go shopping.”

The survey also asked them about their spending aspirations, if they had an extra \$100 in their monthly incomes. Most people said they'd buy more food or better food.

When asked “What about an extra \$1000 a month?” bringing them above the poverty line, nearly half of respondents said they'd move into better housing. This is evidence of how many people with disabilities live in precarious housing that is unsuitable for their needs, varying from accessibility design to simple safety issues.

Lastly, we asked about any other expenses, and the two most common responses were off-list supplements and/or medications as well as travel costs. This illustrates how many people with disabilities face additional expenses that others do not, and in the case of life-saving medications, these are not expenses they can cut corners on. This emphasizes the urgency of this Benefit to support people with disabilities in covering these additional expenses that are absorbing disproportionate amounts (if not all!) of their fixed incomes.

We know that disability and poverty discriminate. The survey shows the horrifying levels of food insecurity experienced by our clients who receive ODSP, due to social assistance rates that keep them trapped in deep poverty and deprivation.

Conclusion

Food insecurity increases health care costs, worsens mental health, increases the risk of injuries and illnesses, and causes premature death. Therefore, Daily Bread will continue to advocate for income security for the people we serve with the aim of eliminating food insecurity in our communities.

We urge members of the Committee to move with dispatch on this issue. Governments are charged with creating the conditions for all to enjoy a standard of living adequate for the health and well-being of each person. (UN Charter of Human Rights). In Canada, our own values, as framed in the Canadian Charter of Rights and Freedoms, compel us to ensure that everyone can live with dignity.

We recognize adopting a new Canada Disability Benefit is a challenge. The Committee is compelled to ensure that the new legislation addresses the complexities raised by definitions of disability, inter-governmental boundaries, consultations, and collaborations with those with lived experience, and the creation of new program pathways. However, we still hold the hope this Benefit can be handled with some dispatch as it is a matter that has been long called-for and one that mimics other federal supports, and so it might be able to get a jump-start from similar pre-existing programs.

We are pleased to be able to support its swift introduction and to underscore how important the Benefit is to ensuring people with disabilities can live a dignified life without relying on food charity.

Thank you very much.

ⁱ Cattari, L. (2021). *Beyond Basic Need: The Financial Cost of Disability*. Hamilton Roundtable for Poverty Reduction. <https://hamiltonpoverty.ca/preview/wp-content/uploads/2021/01/HRPR-Policy-Brief-The-Financial-Cost-of-Disability.pdf>.