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Commission for the Review of Social Assistance  
2 Bloor Street West  
4th Floor, Suite 400  
Toronto, ON  
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Dear Honourable Frances Lankin and Dr. Munir Sheikh,

I am writing on behalf of the thousands of low-income community members who rely on The Stop each year to both register our disappointment in the Commission's most recent discussion paper and offer some suggestions on how to move forward as you work toward your final recommendations in June. As a non-profit agency that works daily with social assistance recipients, we know the barriers to health and dignity that people in our west Toronto neighbourhood face due to the inadequacy of social assistance rates. Sadly, your discussion paper fails to address the flaws of a broken system in a coherent way and, in some cases, actually works to exacerbate them.

The Stop is located in a neighbourhood with a high number of low-income earners and recent and established immigrants. Our programs range from emergency food services such as a food bank and healthy meal programs to community kitchens, peer support, gardens, markets and children's food education initiatives. All of this work gives The Stop a front row seat on the havoc that is wrought—poor health, despair and social isolation—by inadequate social assistance rates.

In particular, I would like to highlight five major concerns that we have with the options discussed in the paper, as well as suggest alternative perspectives on each.

***Failure to address the absolute inadequacy of social assistance rates.***

For the past 3 years, The Stop has worked with thousands of people across the province to raise public awareness about the woeful inadequacy of social assistance rates through our Do The Math campaign and Eat The Math challenge, which asked Ontarians to calculate the monthly amount they think a single person needs in order to live with health and dignity. The average number was \$1,516.00, which was not far off the amount of \$1,314.00 that was calculated by the 18 MPPs from all three parties who also took the challenge. As part of the campaign, thousands of Ontarians also demanded a \$100 Healthy Food Supplement as an immediate first step towards income adequacy, and demanded a transparent way of setting social assistance rates to reflect the cost of living. In your report, you note that 79% of all written submissions made to the commission said that social assistance rates are too low. It is profoundly discouraging, then, that your discussion paper does not

The power of food

reflect calls by social assistance recipients, front-line social service agencies and the general public to *immediately* increase rates.

***Pitting working poor against non-working poor.***

Instead, you have chosen to set the working poor against social assistance recipients and further propagate stigma by claiming the need to balance “fairness, adequacy and incentive”. This framework is troubling – it appears to confirm a commonly held, yet highly problematic, belief that there are deserving (working) poor and undeserving (non-working) poor. Moreover, the notion that fairness can somehow be achieved by keeping social assistance rates below an already inadequate minimum wage is absurd. Instead of promoting this race to the bottom, you should be making strong recommendations in favour of *both* adequate rates and a liveable minimum wage. Doing this requires an analysis of the labour market, its shift towards more precarious work, limited hours, undermined employment standards and an eroding minimum wage. A major barrier to employment for people receiving Ontario Works is not lack of incentive—as you have found, many people want to work—but the instability that comes with living on inadequate rates, as well as a lack of well-paid jobs in Ontario.

***Muddying the waters with discussions of de facto irrelevant poverty measures.***

Another concern is that, in spite of the fact that the Low Income Measure (50% of median income) was chosen by the government as Ontario’s official income poverty line in 2008, you have decided to re-open this conversation and, as a consequence, impeded action on determining the adequacy of social assistance rates. Regardless of which measure is used, social assistance rates need to reflect the cost of living in one’s city or region, something that is most obviously not the case at present. We urge the Commission to stop delaying, confusing and distracting from urgently needed action on setting adequate rates.

***Troubling distinction between “able” and “unable” to work.***

We’re also concerned that the Commission’s latest discussion paper sets up problematic distinctions between those with disabilities who are “able” to work and those “unable” to work. According to discussions in your paper, those deemed “able” to work would need to prove that they are actively trying to do so or risk having their full disability withheld. Making the incomes of people with disabilities dependent on whether or not they participate in work-related activities is punitive and ignores the reality of their lives. You yourselves acknowledge how difficult it is to divide people up according to the severity of their disability, given that disability can be episodic and changeable; moreover, you further acknowledge the challenges in assessing work capacity for people with disabilities. We ask that you do not recommend a system that prioritizes simplicity and so-called “fairness” when disability is itself inherently complex.

***Lack of discussion around transparency of rate setting.***

Several years ago at one of The Stop’s Do The Math events, then-Minister responsible for the province’s Poverty Reduction strategy, Deb Matthews, was asked by a community member how social assistance rates were set. The Minister very candidly and telling replied, “I don’t know.” The fact is that no one knows how social assistance rates are set in Ontario because there is no method for setting them. As we all know, Ontario Works rates were slashed by 21.6% by Mike Harris’ government in the 1990s and have increased incrementally and minimally ever since, with perceived affordability and political palatability seemingly the only criteria used to determine the amount and the frequency of these paltry increases. This absurd “system” has been keeping thousands of Ontarians in deep poverty for over 15 years and it has to change. The only thing that makes any kind

The power of food

of sense would be to set the rates to somehow reflect the cost of living in a person's city of region and index them to the rate of inflation. The tools and data exist to make these calculations. For example, we know what the average costs of rental units are across the Province and the nutritious food basket measure is designed to calculate the costs of a healthy diet in different regions and for various family sizes. Whatever measures are used, there must be some logic employed in determining the rates and this must surely include what it actually costs to live.

The Commission you lead has a unique opportunity to take bold leadership and clearly articulate what is needed to increase the health and dignity of social assistance recipients in Ontario. Unfortunately, we have not seen this leadership demonstrated in your first two discussion papers. With the Drummond Report prescribing an austerity agenda, we need a strong voice that will stand up for the province's poorest citizens by creating a rate structure and social assistance system that enables them to live with health and dignity. Not only is this the ethical thing to do but also, as you already know, poverty affects us all: the costs of taking decisive action to lift hundreds of thousands of Ontarians out of poverty now is nothing compared to the downstream costs associated with lives lived in poverty.

We encourage you to keep these goals of dignity, health and equity foremost in your minds as your work unfolds over the next few months.

Sincerely,



Nick Saul  
Executive Director  
The Stop Community Food Centre