To look at complementary activity going on in the area of food safety and food security, and to see how one might supplement the other, and where some of the divisions and requirements are, I am going to talk about the traditional food safety approach and a couple of initiatives we are undertaking in Toronto.
This fits into the paradigm of looking at complementarity and strengthening the system. In Canada, food safety is a shared responsibility.
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Board of Health policy can lead into places that are not legislated; and that’s certainly is the case in Toronto. Ability to follow policy may be hindered by time and resources.
Authority is under the Health Protection and Promotion Act and the food premises regulation. Toronto municipal code chapter 545 gives authority to post.
Food Safety Program Components

- Risk Assessment
- Compliance Inspections
- Complaint Investigations
- HACCP Audits
- Food Handler Training and Certification
- Investigation of Food borne illness
Enhancing Access – Street Food
From about 2005, we got more involved in street food issues.

- Was a push to enhance foods available – people wanted more than hot dogs and sausages.
- Other jurisdictions were increasing street options – Europe (Amsterdam, London), US (Oregon, New York City).
- Looking into enhancing street food options raised many interesting issues: policy issues, food safety issues and so on.
- Wanted to reflect cultural diversity and also the cuisines from all over the world. We wanted to promote local cuisine and we want to promote healthier fast food choices. Although if you take a look at that sentence, “healthier fast food choices,” it doesn’t necessarily equate sometimes, does it?
In July of 2007, Ontario regulation 562 was amended to allow street vendors to vend a wider variety of foods.
In June 2008, Toronto Public Health developed recommendations for the introduction of healthy, ethnically diverse street foods.

"Toronto a La Cart" was approved by City Council in November 2008 and was implemented in May 2009 with eight vendors.
Toronto a la Cart

City Council approved a pilot project (Jan.2008) to expand the menu for street food carts

- Regulating the sale of a variety of food alternatives to hotdogs and sausages in public places.
- Planning and consultation on the design and manufacture of up to 15 "Toronto a la cart" food-vending carts.
- Monitoring the program to ensure that the food is safe to eat.

- A La Cart Program suffered from “Mission Creep.”
- Started out relatively straightforward and simple, but councillors, community groups and various other folks wanted to be involved, and it imploded because of all the expectations that were laid on it.
- At its core it was a distinctive cart, a range of menus to reflect cuisine from around the world, properly trained food handlers, etc.
- Costs escalated, e.g. city required custom cart that cost $40,000 – carts were well designed but required trucks to move off street (unintended consequence)
- Environmental Health basic criterion: food safety (food premises regulation, properly trained food handlers, etc.)

- 15 Toronto A La Cart food vending carts were produced, but only 8 vendors – others dropped out because of cost, circumstances, etc.
Risk assessment approach:
• food that was being served
• where it was originating from (not preparing everything on the cart)

Street food pilot was in the context of the changes to the amendment in the regulation, allowing some more latitude than previously (i.e., hotdogs and sausages)

• Business opportunities were limited by other factors: e.g., local brick and mortar restaurants complained
Street Food Pilot

Prior to the changes in Regulation 562, street food vendors were limited to selling only pre-cooked meats in the form of a wiener or sausage.

*The revised regulations allow the selling of street foods which are:*

- **Pre-packaged**, and/or
- **Pre-cooked** in another food premise and re-heated on the street vending cart,
- **Non-hazardous** (meaning any food that is not capable of supporting the growth of pathogenic organisms or the production of the toxins of such organisms).
Provision that Medical Officer of Health has some authority effectively means environmental health protection. We have some authority to take a look at other foods, if they meet requirements. We do assessment on food, look at equipment, and say whether or not it is acceptable.
Coming out of the A La Cart experience was the creation of the street food vending working group to do comprehensive review of program. Looked at experience of other jurisdictions, restrictions, compliance requirements for public health permitting and licensing, zoning regulations and city bylaws, etc. All such factors need to be considered for success.
Even in jurisdictions that have been identified as supporting a vibrant street food culture,

*the restrictions and compliance requirements with respect to public health regulations, permitting and licensing requirements, and zoning regulations regarding where and when vending may occur, mirror many of the existing provisions in Toronto.*
Enhancing Access - The Community Food Skills and Employability Project
In early 2011, Toronto Food Strategy developed a Toronto cross-divisional pilot project that integrated food safety, food literacy and employment skills through a hands-on learning approach.

Started with training and certifying food handlers – began working with other divisions in Toronto Public Health with agendas related to food, food security, food access, etc. – e.g., employment and social services.
The Community Food Skills & Employability Pilot Project

- The cost of the training is a barrier for many low-income residents
- Residents who are looking for work in the food services industry have a much better chance if they have obtained Food Handler Certification
- More community members would be successful in the Food Handler Training if it was delivered in community locations where participants feel comfortable and offered in ways that met a range of learning styles.

Cost of food handler training is a barrier to many low income residents

- Program addresses that barrier
- Residents looking for work in the food service industry have a much better chance of getting employment if they are certified

Reached out to community, realized the types of barriers that they were facing, and needed to find a way to address that

- Bringing the training to where the local communities
- Keeping groups small enough and coherent enough
Holistic approach to try and ensure that all the levers that local government has are being employed for us to come up with a successful conclusion, at no cost to participants at multiple sites. Going to where they are, removing the financial barrier, has made quite a difference.

The Community Food Skills & Employability project

*It enabled Toronto Public Health (TPH), Toronto Employment & Social Services (TESS), Social Development, Finance & Administration (SDFA), Economic Development and other City divisions to work together and provide food literacy and Food Handler Training certificate and employment skills at no cost to participants at multiple sites in Toronto.*
The Community Food Skills & Employability project

- **Food skills training:** Hands-on food preparation and cooking facilitated by a Public Health Dietitian or a community partner staff to promote food safety, culturally appropriate meals and snacks, affordable and easy to prepare recipes; promote the use of local ingredients and minimize waste.

- **Food Handler Training and Certification:** Delivered by a Public Health Inspector to ensure all food handlers (commercial and residential) are educated about safe food handling practice to prevent food-borne illness.

- **Employment services and case management supports:** Delivered by TESS staff to assist participants in learning about career paths into the food services industry and connecting to suitable educational and employment opportunities.

All 3 aspects of project work together to try and ensure that you have suitable qualified food handlers.

Addresses employability and the support system needed for people to succeed

- Includes employment counselling
- Connecting people to the food services industry
- making sure that there are suitable educational and employment opportunities
- bringing all those various compartments together

Opportunity to enhance what awe are trying to do.
Pilot program demonstrated successful collaboration – the city reduced duplication, fragmentation of services, and achieved synergy and outcome greater than each could have attained by themselves.

The success rate has been really quite dramatic. Of the folks who have taken this pilot program, I believe 70+% were able to get employment in the food services industry. Would have been much more difficult for them on their own and without food handler certification.
Enhancing Access - Menu Labelling
There will be a health report going forward in the fall. Menu labelling fits a number of different criteria: right to know, transparency, giving people the necessary information to make informed choices. Menu labelling is an important component to a comprehensive approach, in addition to food security and food safety programs, to ensure that people are making informed choices. Rationale includes obesity and diabetes control.

Toronto is not the first to do this. There are many jurisdictions in Europe and North America already doing it. Many of the chains are already adopting some of these practices. I believe there is a federal regulation in the USA that is also coming into play.
• Currently involved in voluntary menu labelling pilot with 15 restaurants confirmed.
• Tried to pick independents, primarily, because we will be focusing on independents and on chains.
• There are a number of supports that are available to folks in the industry in terms of enabling this to happen.
• We wanted a complementary approach: dietitians working with health inspectors. We want to make sure there is no confusion about who does what. The health inspector still has a regulatory role to play.

• Some independent restaurants are already starting to put the information, so is a successful pilot.
• Ontario Restaurant Association executives have practical concerns – a lot of work for a large menu, expensive, menus need reprinting, menus change regularly, etc. Working with them, and some who own independent restaurants are participating in the pilot.
There is value in terms of providing the information to the customers, making it as transparent as possible, making it easy for people to see. We want to make it as simple as possible. And it is feasible to do this.
It’s going to require some new resources.
Menu reformulation is not appropriate for franchise chains.
Nutrient analysis is less flexible to ongoing recipe changes. (Many chefs don’t measure, and change formulations regularly.)
Conclusions

- TPH provides a standard food safety program and has substantial policy and program interest in food security
- TPH programs collaborate on food safety and food security issues while fulfilling their primary mandates
- Public health and safety is enhanced
- Environmental Public Health practice is enhanced