

Greater Vancouver Food Bank Society
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April 1, 2020

Dear Greater Vancouver Food Bank Board of Directors,

RE: Policy Changes at the Greater Vancouver Food Bank Society

I am writing on behalf of Pivot Legal Society regarding client identification policy changes the Greater Vancouver Food Bank (“GVFB”) announced, set to take effect April 1, 2020.¹

As an organization committed to dignity, justice, and human rights, Pivot recognizes that people rely on the GVFB to receive a consistent supply of healthy food. The policies that are set to come into effect today will exclude many people from receiving your vital services. In addition, the policies will have ripple effects that perpetuate stigma and social exclusion. Alongside clients, volunteers, food security advocates, community organizations, researchers, and broader members of the public, we are voicing their concerns with your new Client Re-Registration Policies.

About Pivot Legal Society

Pivot is a non-profit legal advocacy organization that works to undo the social stigma faced by marginalized people. Pivot’s mandate is to take a strategic approach to social change, using the law to address root causes of issues that undermine the quality of life of those most on the margins. Pivot takes a responsive approach to community needs through direct consultation with people most affected by laws, policies and actions that entrench poverty and stigma.

GVFB Policy Changes

The policy changes, advertised on the website as “Client Re-Registration,” are set to come into effect on April 1, 2020. The Re-Registration process identifies a number of original documents that clients must bring to the GVFB

¹ <https://foodbank.bc.ca/find-food/registration/>

head office, in Burnaby, in order to continue receiving food. These documents include current government-issued photo ID, proof of address, and proof of low income (2019 Notice of Assessment or three months' worth of income verification documents). Photocopies are prohibited.

Impact of Policy Changes

These new requirements implemented by the GVFB clearly discriminate against people who are disadvantaged because of poverty, homelessness, or reliance on government assistance. Cumulatively, stigma and exclusion stemming from these realms may be understood as discrimination based on “social condition.”² The Client Re-Registration Process is a high-barrier process that will effectively de-register clients who may have been previously eligible for services and exclude potential clients who cannot obtain the prescribed documents.

Program requirements that require clients to produce proof of address effectively exclude people who are unsheltered and those who rely on public space (ex. sheltering in parks, vehicles or couch-surfing). Requiring identification documents further discriminates against people who cannot produce original documents - documents that may have been lost, stolen, or disposed of by police or bylaw officers. In a 2019 interview, Rev. Carmen Lansdowne from First United notes that identification cards are frequently lost or stolen in the Downtown Eastside, and documents are costly and difficult to replace for low-income folks.³ Denying people services if they cannot provide an address or original ID is tantamount to punishing people for their social condition.

Addressing Stigmatizing Policies

We take a particular interest in GVFB's new policy as our work includes fighting to end the criminalization of homeless people, challenging discriminatory laws and law enforcement practices that violate human rights, asserting the rights of all to healthy and secure housing, and empowering people experiencing homelessness to take steps to improve their lives. We have an interest in any non-profit bylaws, policies, or regulations that are addressed at or impact people experiencing homelessness.

In 2018, we published *Project Inclusion: Confronting Anti-Homeless & Anti-Substance User Stigma in British Columbia* which revealed that a complex web of laws, regulations, and policies affect the lives and the health of people who are marginalized as a result of homelessness, substance use, or engagement in sex work.⁴ During our research for this report, we met people who relied on public space throughout BC and had to navigate completely inappropriate food bank policies — for example, “we were told the food bank won't hand out food to people without a home address and finding free food can be ‘ridiculously hard.’”⁵ The GVFB's high-barrier access policy has been identified in other communities as a threat to human rights and dignity. Securing the basic necessities of life — including food security — should not be a hardship. In the communities we work with, we recognize that restrictive policies have a particular impact on people who live with intersecting oppressions. When considering the nature of intersecting oppression, the 2019 *DTES Plan Community Fair Consultation Summary* notes:

For the DTES to be successful as a whole, the lives and voices of the vulnerable and marginalized must be at the forefront in the discussion and planning stages. For this to be a healthy area of the city, Vancouver must address the issues of physical safety, addiction, housing, racism, and affordable and healthy food (ie food desert) around Oppenheimer Park and Hastings.⁶

By creating policies that restrict and deny access to the GVFB, your organization is exacerbating issues of food insecurity and food justice spanning the entire Lower Mainland.

² http://www.pivotallegal.org/social_condition

³ <https://thetyee.ca/News/2019/03/04/BC-ID-Changes-Hurt-Marginalized/>

⁴ http://www.pivotallegal.org/project_inclusion_full at page 20

⁵ http://www.pivotallegal.org/project_inclusion_full at page 20

⁶ <https://vancouver.ca/files/cov/dtes-plan-community-fair-consultation-summary-june-2019.pdf> at page 26

Shifting Towards Inclusive Policies

Your policy changes will mean that people with precarious housing, work, and life circumstances who cannot provide a high level of documentation will not be able to access food. Pivot implores the GVFB Executive and Board of Directors to pause implementing this new policy and undertake the recommendations set forth by numerous organizations and individuals identified in the Open Letter to the Greater Vancouver Food Bank.⁷ As this open letter states, at a time of two public health emergencies — the COVID-19 crisis and the drug poisoning crisis — timely and dignified access to food is especially critical. The letter identifies three concrete demands:

- Conduct a thorough re-evaluation of the intake changes, and other recent GVFB policy shifts, that includes the voices of those directly affected, including clients, volunteers, and community partners;
- Complete a thorough external review of, and accountability for, the processes leading to these decisions;
- Ensure sufficient processes are in place for the stewardship of the organization and of its human, food, and financial resources in the future.

In addition to these demands, we recommend that the GVFB undertake an organizational stigma-auditing process and work with paid peer researchers to discuss stigma embedded in existing laws, policies, and decision-making practices. A stigma audit at the GVFB would ensure the organization can identify and improve gaps in knowledge and attitude which impact policies, regulations, and decision-making behaviour.⁸

Before passing policies and regulations that will impinge on the lives of people who rely on the GVFB, you must engage in meaningful consultation that is informed by the lived realities of the individuals and communities who are most acutely impacted by stigma and discrimination. We urge you to listen to the clients, volunteers, food security advocates, community organizations, researchers, and broader members of the public who have identified grave concerns with policy changes and the GVFB.

Sincerely,

Meenakshi Manno, MSW RSW
Criminalization & Policing Campaigner

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⁷ <http://www.openlettertogvfb.com/>

⁸ http://www.pivotlegal.org/project_inclusion_full at page 125