

# Written Submission for the Pre-Budget Consultations in Advance of the Upcoming Federal Budget

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## LIST OF RECOMMENDATIONS

- **Recommendation 1:** That the government transition the federally funded prison farms at Collins Bay Institution and Joyceville Institution in Kingston, Ontario, into a federally funded food bank project to address the threat of food insecurity during and after the COVID-19 pandemic.
- **Recommendation 2:** That the government provide funding in the amount of \$4.3 million to be spent over five years to convert the prison farms from dairy and meat production for the private sector to plant-based food production for food-insecure communities.
- **Recommendation 3:** That the government amend the Correctional Service of Canada's mandate to operate prison farms as a for-profit agribusiness in order to permit prison farms to operate as a non-profit social justice venture instead.
- **Recommendation 4:** That the government review the composition of the Prison Farm Advisory Panel in order to appoint experts in sustainable agriculture, transformative food justice, and social innovation.
- **Recommendation 5:** That the government instruct the Correctional Service of Canada to reassign its existing dairy cows and stocker beef cattle to establish a small-scale Animal Assisted Therapy program for inmates that can be maintained under strict supervision and public transparency.

## BODY OF SUBMISSION

Food security experts warn the global pandemic is leading to supply shortages and vulnerabilities in our food systems. As a result, the federal government is investing \$100 million for food banks facing an increase in demand and a drop in donations.<sup>1</sup>

Prison farms, as a federally funded program on federally owned farmland, are ideally suited to support this effort if they can be converted from a for-profit agribusiness using prison labour for the private sector, to a non-profit social justice venture.

### **PRISON FARM PROBLEMS:**

*Procurement of goats, misspending of public funds, competition with farmers*

The beef and dairy operations being introduced at Collins Bay Institution and Joyceville Institution in Kingston, Ontario, are fraught with difficulties. Since implementation began with the 2018 federal budget allocation of \$4.3 million over five years, very little progress has been made by the Correctional Service of Canada (CSC).

The major livestock enterprise was to be an industrial goat dairy operation producing 2,250 litres of goat milk per hour,<sup>2</sup> requiring more than 3000 milking does, which would be the largest goat farm in Canada and a federally subsidized operation competing with farmers in the open market.

Despite issuing two Requests for Proposals for dairy goat kids in 2018<sup>3</sup> and 2019,<sup>4</sup> CSC has not succeeded in procuring any goats or initiating construction of the multi-million-dollar industrial milking facility at Joyceville Institution, for which CSC has allocated an additional \$9.75 million from its existing capital budget.<sup>5</sup>

According to the President of Ontario Goat, “The concept of the prison farm being one of, or possibly, the largest dairy goat farm in Canada, is not right. The magnitude of work and proper care needed to make such an operation work, is immense. To include animal care and everything else to this scale with any livestock sector, is not responsible in any way.”<sup>6</sup>

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<sup>1</sup> <https://www.cbc.ca/news/politics/food-security-covid19-trudeau-1.5520492>

<sup>2</sup>

[https://buyandsell.gc.ca/cds/public/2018/12/17/aa23764efb657e0605006c7f7c56a263/ABES.PROD.PW\\_KIN.B630.E7646.EBSU001.PDF?fbclid=IwAR2XOfsNTRif4PVr7M\\_oEYhriSTeTEUuy6mRY7p5T3HmALioUI\\_B8v7R\\_lo](https://buyandsell.gc.ca/cds/public/2018/12/17/aa23764efb657e0605006c7f7c56a263/ABES.PROD.PW_KIN.B630.E7646.EBSU001.PDF?fbclid=IwAR2XOfsNTRif4PVr7M_oEYhriSTeTEUuy6mRY7p5T3HmALioUI_B8v7R_lo)

<sup>3</sup> <https://buyandsell.gc.ca/procurement-data/tender-notice/PW-KIN-630-7618>

<sup>4</sup> <https://buyandsell.gc.ca/procurement-data/tender-notice/PW-KIN-630-8000>

<sup>5</sup> As confirmed by internal CSC documents obtained by Scott Reid, MP for Lanark-Frontenac-Kingston, and Access to Information documents obtained by Evolve Our Prison Farms

<sup>6</sup> Email to Evolve Our Prison Farms July 30, 2020

### *Prison labour for the private sector*

The establishment of for-profit prison farms selling to the private sector and possible export markets<sup>7</sup> is legally problematic. Prisoners working in federal penitentiaries are paid less than a dollar per hour.<sup>8</sup> According to the Queen's Business Law Clinic, associating underpaid prison labour with the private sector is a violation of human rights under International Labour Organization standards, since Canadian prison labour does not meet the required conditions of voluntariness and wages comparable to free workers.<sup>9</sup>

### *Beef cattle mismanagement, processing backlogs, research quota*

CSC's efforts to introduce beef production for the private sector have failed tragically. Of 19 bull calves acquired by CSC in December 2019, at least 14 have died under unknown circumstances.<sup>10</sup> CSC intends to acquire more beef cattle to replace these losses,<sup>11</sup> however CSC may encounter challenges in selling these cattle since the pandemic has resulted in a backlog in meat processing. COVID-19 outbreaks have caused closures and slowdowns at slaughter facilities across the country, with as many as 9,000 head of cattle a day being backed up within the Canadian beef supply system.<sup>12</sup> As a result, farmed animals are being culled by the millions in what has been described as "an orgy of waste."<sup>13</sup>

In addition to beef cattle, CSC intends to acquire up to 60 dairy cows.<sup>14</sup> Since the milk can't be sold to the private sector due to dairy quota restrictions, or served into prisons due to CSC's Food Service Modernization,<sup>15</sup> CSC will purchase an allotment of research quota from the Dairy Farmers of Ontario (DFO),<sup>16</sup> a category typically reserved for educational and research institutions. According to DFO board member Nick Thurler, the research quota has not yet been assigned.<sup>17</sup> As of July 2020, CSC's media department indicates that 24 young dairy cows have been acquired, although milking operations are not yet in place.

### *Zoonotic illness and agricultural pollution*

CSC has implemented security precautions to prevent the spread of COVID-19 within its institutions. The introduction of an indoor concentrated animal operation involving thousands

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<sup>7</sup> <https://evolveourprisonfarms.ca/prison-farms-feihe-connection/>

<sup>8</sup> <https://www.csc-scc.gc.ca/acts-and-regulations/730-cd-eng.shtml>

<sup>9</sup> <https://evolveourprisonfarms.ca/exporting-prison-produced-goods/>

<sup>10</sup> CSC media lines

<sup>11</sup> Ibid

<sup>12</sup> [https://www.cbc.ca/news/politics/agriculture-pandemic-covid-coronavirus-canada-1.5556670?fbclid=IwAR329MRMnPUXdpYeL7y1W1E-vtu7YTH\\_WG-GZCOAPgwpodALWdF7q3Q2ai0](https://www.cbc.ca/news/politics/agriculture-pandemic-covid-coronavirus-canada-1.5556670?fbclid=IwAR329MRMnPUXdpYeL7y1W1E-vtu7YTH_WG-GZCOAPgwpodALWdF7q3Q2ai0)

<sup>13</sup> <https://harvardpolitics.com/united-states/rather-than-cull-millions-of-livestock-lets-end-animal-agriculture/>

<sup>14</sup> CSC media lines

<sup>15</sup> Ibid

<sup>16</sup> Access to Information documents obtained Evolve Our Prison Farms

<sup>17</sup> "Planned prison farms have goat milk demand issues; Over 50 Freedom of Information requests unveil a planned \$9.75M expenditure in goats and dairy cows," Ian Cumming, *Ontario Farmer*, August 4 2020

of goats creates prime conditions for viral spread and potential exposure to zoonotic illness. According to the UN Environment Program (UNEP) and International Livestock Research Institute (ILRI), about 60 per cent of known infectious diseases in humans and 75 per cent of all emerging infectious diseases are zoonotic.<sup>18</sup>

Intensive animal agriculture is a major cause of air and odor pollution, industrial traffic, and contamination of groundwater, local lands and waterways. Joyceville Institution borders the Rideau Canal system and the UNESCO designated Frontenac Arch Biosphere Reserve and is located in immediate proximity (1 km - 5 km) to an elementary school, a community playground, a golf and country club, a church, and numerous residential homes and family farms in an area interspersed with campgrounds, sensitive waterways, and tourist opportunities. The planned intensive livestock operation will adversely affect the health and quality of life of neighbouring residents and result in decreased property values.

### *Abuse of Indigenous labour*

Over 30% of Canada's federal prison population is Indigenous, despite being just 5% of the general population.<sup>19</sup> According to the Correctional Investigator of Canada, the Indigenous overrepresentation in Canadian prisons is "nothing short of a national travesty."<sup>20</sup>

The prison farms will inevitably see an overrepresentation of Indigenous labourers whose progress towards parole is dependent on completing work assignments. The coercion of Indigenous inmates to work in industrial farming ruptures Indigenous relationships to animals and contradicts the Truth and Reconciliation Call To Action #42 regarding Justice.<sup>21</sup>

Academics have highlighted the role that prison agriculture has played in relation to Canadian nation-making, having functioned as a means of prison expansion and settler territorialisation. According to Dr. Kelly Struthers Montford, "The prison farm ought to be viewed as an institution made possible by, and that reproduces, settler colonial power relations to animals, labour, and territory. Prison agribusiness is then an expression of colonial, agricultural, and carceral powers."<sup>22</sup>

### **PRISON FARM SOLUTIONS:**

There are nearly 1500 acres of prison farmland in Kingston, Ontario. This federally owned land can be utilized for the production of nutrient-dense food crops for direct human consumption to address the threat of food insecurity through a non-profit social justice venture.

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<sup>18</sup> <https://www.cbc.ca/news/technology/coronavirus-pandemic-climate-change-1.5639382>

<sup>19</sup> <https://www.cbc.ca/news/indigenous/indigenous-overrepresentation-prison-oci-statement-1.5434712>

<sup>20</sup> <https://www.theguardian.com/world/2020/jan/22/one-third-canada-prisoners-indigenous-report>

<sup>21</sup> [http://trc.ca/assets/pdf/Calls\\_to\\_Action\\_English2.pdf](http://trc.ca/assets/pdf/Calls_to_Action_English2.pdf)

<sup>22</sup> [https://www.pdcnet.org/radphilrev/content/radphilrev\\_2019\\_0022\\_0001\\_0113\\_0141](https://www.pdcnet.org/radphilrev/content/radphilrev_2019_0022_0001_0113_0141)

Currently, only a few hundred acres have been planted with monoculture crops (corn, soybeans, barley and hay for livestock feed and bedding).<sup>23</sup> Instead of proceeding with the planned livestock operations, there is a substantially more advantageous approach that can be implemented by converting Kingston's prison farmland into a federally funded food bank project.

This social justice measure could solve an array of problems:

- Address food shortages and preserve local food security;
- Supply produce for food banks, northern indigenous communities, and other at-risk communities;
- Relieve overcrowding in prisons as prisoners work outdoors on plant-based farms, lowering risk of COVID-19 outbreak;
- Salvage the prison farm program itself, which is in jeopardy due to the unfolding crisis and unfavourable public opinion, as well as the serious legal issues and human rights violations inherent in the planned for-profit industrial agribusiness model selling to the private sector and possible export markets.

#### *Year-round food production*

Investment in innovative technologies such as agrotunnels developed by Food Security Structures Canada would permit prison farms to pilot emerging technologies that can contribute to year-round sustainable, local, and ecological food production in any Canadian climate.<sup>24</sup>

#### *Ethically integrating animals*

Instead of selling or slaughtering the 24 young dairy cows and five surviving bull calves that CSC has already acquired, these animals can form the basis of a small-scale Animal-Assisted Therapy (AAT) program that would complement social-justice-oriented prison farms. This is a model that has proven effective in other prisons in the United States,<sup>25</sup> Italy,<sup>26</sup> and elsewhere.<sup>27</sup>

AAT would preserve the therapeutic benefits of animal interaction without the disbenefits and complications of animal agriculture (e.g. insemination, birthing, milking, slaughter), and it

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<sup>23</sup> <https://www.thewhig.com/news/local-news/prison-farm-properties-up-and-running-on-limited-basis>

<sup>24</sup> <https://www.foodsecuritystructures.ca/>

<sup>25</sup> <https://www.keyssso.net/farm>

<sup>26</sup> <https://www.theguardian.com/world/2020/aug/06/gorgona-italys-last-penal-colony-where-100-criminals-care-for-180-farm-animals>

<sup>27</sup> <https://www.telegraph.co.uk/news/2018/12/27/prisoners-allowed-stroke-feed-goats-nhs-animal-therapy-sessions/>

would align with CSC's own strict guidelines for AAT, also referred to as PFT (Pet-Facilitated Therapy) and AFT (Animal-Facilitated Therapy)<sup>28</sup>:

- The welfare of animals engaged in PFT programs is a crucial concern and should be given primary consideration when developing/implementing the program.
- The therapy animal is in every way an individual.
- The animal's safety and humane care precedes any therapeutic goals.
- Incorporate close monitoring and structure into the program.
- Animals benefit from this program as they are often saved from certain death and given a second chance.
- PFT programs, when implemented effectively, demonstrate a positive addition to any facility. These programs benefit all parties involved and impact in such a way as to make a real difference in the lives of inmates, staff and the animals.

According to Keryn Denroche of Kindred Farm Sanctuary in B.C., which provides AAT for at-risk and traumatized children and youth: "Cows, goats and any farm animal can be specifically socialized and trained for animal-assisted therapy. They are in a distinct line of work with structured outcomes and therapeutic goals."<sup>29</sup>

#### *Evidence-based decision-making*

In 2017, the Correctional Service of Canada appointed a seven-member Prison Farm Advisory Panel consisting primarily of conventional livestock farmers. In order to facilitate the prison farm transition, the composition of this panel should be reviewed. New appointments could include farmers from Kingston's vibrant organic plant-based farming community, experts in the rehabilitative potential of human-animal relationships, and academics who specialize in transformative food justice, carceral food systems, and social innovation. A citizen advisory panel appointed by the federal government must aspire to a high level of balanced representation and commitment to evidence-based policy recommendations.

#### **CONCLUSION:**

For the above reasons, we recommend that the 2021 Federal Budget allocate \$4.3 million over five years to transition Kingston's federal prison farms to a non-profit social justice model feeding food banks and food-insecure communities. This would fund the conversion of a failing

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<sup>28</sup> <https://www.csc-scc.gc.ca/publications/fsw/pet/pet-eng.shtml>

<sup>29</sup> <https://briarpatchmagazine.com/articles/view/whats-wrong-with-milking-prison-labour>

model into a timely response to problems posed by COVID-19, and would ensure the long-term sustainability of prison farms in Canada.

Such a transition would support CSC's mandate to prepare prisoners for safe release through provision of appropriate social, educational, vocational and correctional programming, while contributing to the government's broader goals in the areas of greenhouse gas reduction, sustainability, food security and public health.

Crucially, this transition would also form the basis of a new pilot project for prison farms to become a network of food security in Canada, rather than the current trajectory of prison farms becoming a network of prison labour for the private sector.