

January 24, 2020

Ms. Julia Douglas
Clerk
Standing Committee on Finance and Economic Affairs
Queen's Park, Whitney Block, Room B-304
Toronto, Ontario M7A 1A2
comm-financeaffairs@ola.org

RE: 2020 Pre-Budget Consultations

Dear Ms. Douglas:

Dairy Farmers of Ontario (DFO) is pleased to have the opportunity to provide input and recommendations for Ontario's 2020 Budget.

Our submission provides three recommendations to assist dairy farmers in continuing to contribute to the Ontario economy, and to being a pillar of Ontario's rural economy:

1. Investing in training for animal welfare inspectors and for those enforcing the protection of farmers and food safety;
2. Ensuring food policy and provincial institutions' meal planning are guided by peer-reviewed evidence;
3. Advocating to the federal government about the need to protect trade and market access for dairy.

Dairy Farmers of Ontario

As background, the Dairy Farmers of Ontario (DFO) is the marketing group representing Ontario's more than 3,400 dairy farms and 10,000 farmers. DFO is owned and operated by the farm families of Ontario's dairy farms. Dairy is the largest industry in Ontario's agricultural sector, with dairy representing about 20% of Ontario's primary agriculture economy. Ontario's dairy industry supports almost 76,000 full-time jobs and the dairy value chain contributes over \$6B to Ontario's GDP. Dairy farmers are proud to produce high-quality milk for consumers through a safe and reliable system, that includes concern with the welfare of the animals under our care (ensuring they are healthy and well-cared-for).

Animal Welfare and Protection of Farmers and Food Safety

Recommendation: Ensure funds are budgeted for specialized training for animal welfare inspectors and for enforcing protections in Bill 156.

DFO would like to commend the work of the provincial government to pass *Bill 136, Provincial Animal Welfare Services (PAWS) Act*. We believe this Act establishes a proper regime for animal welfare and protection in Ontario. The legislation identifies that one of the duties of the Chief Animal Welfare Inspector is "to ensure that animal welfare inspectors receive appropriate training

respecting their powers and duties". To that end, we are pleased that the Act provides for the Minister to make regulations "governing the training of animal welfare inspectors". It is highly important that animal welfare inspectors receive training that is specific to the animal species and the applicable standards of care. DFO would be pleased to provide support to the Government in finding experts for this training. At the same time, DFO notes money needs to be set aside to provide for this necessary training of the animal welfare inspectors.

We would also like to express our gratitude for the commitment of this government in addressing farmer and food safety, evident through the introduction of *Bill 156, the Security from Trespass and Protecting Food Safety Act, 2019*. Bill 156 will protect farmers, our homes, our animals and livestock transporters from harm by unauthorized visitors who risk exposing farm animals to disease and stress, as well as risk contaminating the food supply. DFO wants to make clear that, for this Bill to be effective, funds need to be budgeted for the necessary training to enforce the security it enshrines.

Food Policy and Provincial Institutions' Meal Planning

Recommendation: Work with relevant professionals and experts to gain specific guidance on how best to promote healthy eating and to improve public health outcomes which support fiscal priorities, based on best-available peer-reviewed evidence.

In January 2019, Health Canada released a new version of the Food Guide, which unlike previous additions, no longer classifies food into different groups or provides recommended serving counts for intake. The Guide recognizes that both milk and dairy products are an important source of protein. However, dairy no longer has a distinct category; it is in the same category as other proteins, including fortified soy beverages, legumes and nuts.

The changes to the Food Guide are a change in perspective but not a change in the fundamentals of what constitutes a healthy diet. In meal planning for provincial institutions, the new Food Guide needs to be used in conjunction with the best available scientific peer-reviewed evidence. Unfortunately, this evidence was not fully captured in this new Food Guide. A subsequent publication targeted to health professionals and policy-makers, *Canada's Healthy Eating Pattern*, is to provide more specific guidance on the recommended amounts and types of foods, particularly with regard to life stage (i.e. different requirements for children and for older adults). This publication was expected in December 2019, but has still not been released.

It is difficult to compare cow's milk with alternative plant-based beverages in terms of nutrition because of the different varieties of products, the variation in the way they are processed and the variation in fortification that is added to some products. Research shows that cow's milk products are a key source of calcium, magnesium, zinc, vitamin A, vitamin D, and potassium, which are 6 of the 8 nutrients that most Canadians do not consume enough of. The calcium in cow's milk is also in a form more easily absorbed by the body. Research also demonstrates that cow's milk products are important for children for optimal growth and development, while in aging adults it helps preserve healthy bones and muscles. Like the alternative plant-based beverages, Canadian cow's milk is free from antibiotics and growth hormone.

The alternative plant-based beverages are difficult to compare in terms of environmental impacts because all stages of production need to be factored in to assess the impact. What is clear, though, is

that each alternative plant-based beverage has different environmental issues when compared to each other and to cow's milk. For example, a soy beverage made from soybeans requires a lot of land compared to other alternatives, while almonds used to produce an almond beverage have a very large water footprint compared to other plants (not to mention that a sizeable portion of the almond crop is grown in drought-ridden California).

At the same time, the dairy industry has worked hard to improve productivity, improve resource management and reduce waste. In fact, the Canadian dairy industry has worked to reduce their environmental impact and Canada now has a dairy industry with among the lowest carbon footprints in the world. Farms are also working to increase their sustainability through environmentally-friendly farm practices like crop rotation. In the past five years, they have significantly reduced the water consumption and land use associated with milk production.¹

Many individuals are considering the nutrition, sustainability and environmental impact of their food choices. Based on peer-reviewed evidence, Canadian dairy products are a nutritious, sustainable source of protein and other important nutrients.

Canada's Food Guide is a federal document that is supposed to be used by all, including institutions under provincial jurisdiction (i.e. schools, long-term care homes, hospitals, etc.) to help guide food policy and meal-planning. As noted earlier, Health Canada previously indicated that they would release additional resources related to the Food Guide, directed at health professionals in different institutional settings. But these additional resources have yet to be made public. As a result, the new Food Guide does not provide enough guidance to institutions for meal planning and needs to be used in conjunction with other peer-reviewed evidence. These institutions are supposed to make sure that meal planning promotes healthy eating and that residents receive a complement of nutritious food needed to maintain their health. At the same time, these institutions work to meet nutritional standards within tight food budgets and must be cognizant of the health impacts on individual residents of shifts in diet from what residents have been eating for decades.

The Auditor General's Report issued in December 2019 reported on Food and Nutrition in Long-Term-Care Homes and provides an example of one type of institution's ability to provide proper nutritional care. While the audit acknowledged that most long-term-care homes were in the process of transitioning to the new Food Guide, it highlighted the requirement that long-term-care homes provide a variety of food each day from all food groups in keeping with the Guide, as indicated in a regulation under the *Long-Term Care Homes Act, 2007*. This same Act, by regulation, also requires that a long-term-care-home follow the current Dietary Reference Intakes, values established by a scientific body to provide adequate nutrients, fibre and energy for residents. For example, the Dietary Reference Intakes recommended standard for people over the age of 70 years is a dietary allowance of 1,200 mg of calcium per day. The audit found that most of the menus examined did not meet the Dietary Reference Intakes and were not providing adequate nutrition. This indicates that poor meal planning is occurring, leading to improper food and nutritional care which can have detrimental impacts on the health of the residents. The change to the Food Guide will likely amplify the problem since the new guide is less specific and encourages more plant-based protein.

¹ In 2016, Canadian milk production was responsible for using 0.02% of Southern Canada's freshwater supply and 2.9% of Canada's total agricultural land use. <https://dairyfarmersofcanada.ca/sites/default/files/2019-06/PLC-Info-%20EN.pdf>

The Government needs to provide greater guidance on food policy, specifically to provincial institutions, to ensure meal planning in these institutions leads to healthy eating and to improved public health outcomes. DFO would like to work with the relevant ministries responsible for these institutions to assist in identifying experts that can advance this menu planning.

Trade and Market Access

Recommendation: Advocate to the federal government to place a moratorium on further market access openings while the industry adjusts to its diminished market share.

DFO thanks all parties for their continuing support of supply management to date. Supply management has helped us to maintain a high-quality dairy industry and has reduced the environmental impact of the dairy industry by discouraging over-production. The recent federal trade deals have left supply management intact but have created greater access to the Canadian market for foreign milk and dairy products. According to Dairy Farmers of Canada, market-share losses from recent trade deals with Asia, Europe and now North America total 18 per cent, or about \$1.8 billion to milk producers. The federal government has promised compensation to dairy farmers to offset the loss of market share resulting from the free trade agreements. DFO would appreciate provincial support in receiving this compensation. DFO requests the Province to advocate to the federal government for a moratorium on further market access openings for a period, given the level of change and adjustment in the sector. Further changes to the sector will have economic impacts on rural communities and could lead to a loss of jobs in the sector.

Conclusion

Dairy farmers are proud of our contributions to Ontario's communities and economy. We are pleased to provide recommendations for the 2020 Budget that will ensure Ontario's dairy farmers continue to be a driver of Ontario's rural and overall economy.

Sincerely,

Murray Sherk,
Chair