



July 11, 2017

Via Email

Government of Canada
FoodPolicy-PolitiqueAlimentaire@Canada.ca

To whom it may concern:

Re: A Food Policy For Canada Submission

Please accept these extended comments on A Food Policy For Canada on behalf of national animal law non-profit Animal Justice and our tens of thousands of supporters across the country.

Is there another objective that relates to growing more high-quality food that was not identified?

There are major current and emerging market opportunities in plant-based and cultured meat, dairy, and eggs. Plant-based replacements for these animal foods are more environmentally sustainable, better for personal health, better for public health (less food-borne illness, pandemic risk, and antibiotic resistance), and better for the animals not enduring intensive confinement conditions.¹

Canada's own Saskatchewan Food Industry Development Centre assists international clients in developing plant-based meat products and food products containing pulses, acknowledging that both areas are seeing increased consumer interest.² These home-grown innovations should be fostered.

Meat alternatives are drawing investors like Bill Gates and Li Ka-shing, showing there is international interest in solving the numerous issues associated with our over-consumption of animal foods. This is where trends are going.

The government should emphasize supporting growth in plant-based farming and food technology. Recognizing this trend and being an early adopter will help us position ourselves firmly as world leaders in plant-based foods, help us meet growing global food demand, help us meet our climate change reduction targets, be more sustainable, improve public health, reduce health care expenditures, and prevent animal suffering.

¹ See generally Good Food Institute, <http://www.gfi.org/why>.

² Saskatchewan Food Industry Development Centre, <http://www.foodcentre.sk.ca/>.

Conserving soil, water, and air

Research from internationally respected think tank Chatham House has found that reducing global meat consumption is essential if we are to keep global warming below the “danger level” of two degrees Celsius.³

Moreover, the public believes it is the responsibility of government to spearhead efforts to address unsustainable consumption of meat.⁴

Intensive animal agriculture contributes to soil, water, and air pollution. According to the United Nations Food and Agriculture Organization, animal farming:

is probably the largest sectoral source of water pollution, contributing to eutrophication, “dead” zones in coastal areas, degradation of coral reefs, human health problems, emergence of antibiotic resistance and many others. The major sources of pollution are from animal wastes, antibiotics and hormones, chemicals from tanneries, fertilizers and pesticides used for feedcrops, and sediments from eroded pastures.⁵

Animal agriculture also uses an enormous amount of water compared with plant agriculture. “Livestock” account for over 8 percent of global human water use, mostly for the irrigation of feedcrops.

Canadian pulse farmers should be supported in producing sustainable pulse crops for domestic consumption and export. According to Pulse Canada:

Canada's large and diverse agricultural land base is ideally suited for growing a range of pulse crops including pea, lentil, bean and chickpea. More than 2.3 million hectares are seeded to pulse crops each year. Long sunny days and suitable soil conditions provide Canada with a natural production advantage, which is enhanced by the use of the latest farm management technology and research. Cold winters not only protect Canadian pulses from disease and insects, but also reduce storage quality concerns.⁶

³ Chatham House, “Changing Climate, Changing Diets: Pathways to Lower Meat Consumption” (November 24, 2015) <https://www.chathamhouse.org/publication/changing-climate-changing-diets>.

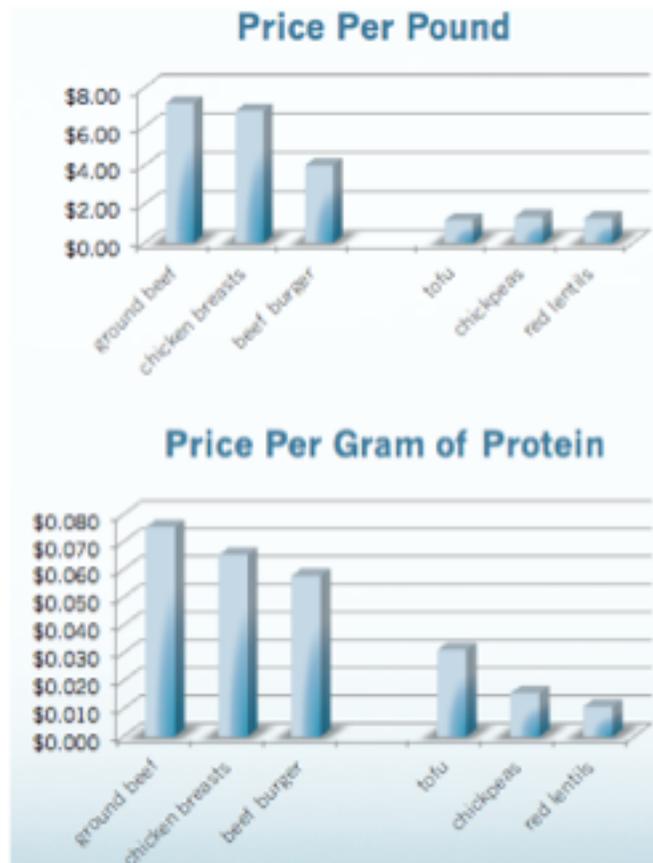
⁴ Chatham House, “Changing Climate, Changing Diets: Pathways to Lower Meat Consumption” (November 24, 2015) <https://www.chathamhouse.org/publication/changing-climate-changing-diets>.

⁵ Food and Agricultural Organization of the United Nations, “Livestock’s Long Shadow” (2006) www.fao.org/docrep/010/a0701e/a0701e00.htm.

⁶ Pulse Canada, “Canada’s Growing Regions” www.pulsecanada.com/canadas-growing-regions.

Affordable food

Plant-based sources of protein are significantly cheaper than animal flesh. At a Vancouver-based grocery store recently, animal proteins were far more expensive both per pound and per gram of protein than plant proteins. With extra lean ground beef costing \$7.19 per pound it is more than five times more expensive than tofu, chickpeas, or red lentils.



The government should develop policies to encourage consumption of healthful, sustainable, and affordable pulses.

Moreover, Statistics Canada reports that Canadians are not eating a sufficient quantity of fruits and vegetables.⁷ There is scientific consensus that plenty of fruits and vegetables are an essential part of a health diet.

⁷ Statistics Canada, "Overview of Canadians' Eating Habits" www.statcan.gc.ca/pub/82-620-m/2006002/4053669-eng.htm#vegfruit.

The government should ensure healthful fruits and vegetables are affordable and accessible to all, and focus on increasing their consumption.

Improving health and food safety

According to Dietitians of Canada, “A healthy vegan diet has many health benefits including lower rates of obesity, heart disease, high blood pressure, high blood cholesterol, type 2 diabetes and certain types of cancer.”⁸

Health Canada recommends Canadians eat more vegetables, fruit, whole grains and protein-rich foods, with a focus on plant-based sources of protein.⁹ Canada’s Food Guide recommends people eat beans, lentils, and tofu (instead of animal flesh) “often.”¹⁰

Yet, Canadians are consuming an unhealthful quantity of animal foods.¹¹ In 2016, Canadians consumed per capita 95.06 kg (209.57 lbs) of animal flesh and 19.93 dozen eggs¹²—far exceeding global averages.¹³

In Canada’s intensive animal farming operations, antibiotics are used to prevent disease in the crowded, squalid conditions. In fact, it is estimated that up to 80 percent of the world’s antibiotics are used in agriculture.¹⁴ According to the World Health Organization:

⁸ Dietitians of Canada, “Healthy Eating Guidelines for Vegans” (November 27, 2014) <https://www.dietitians.ca/Your-Health/Nutrition-A-Z/Vegetarian-Diets/Eating-Guidelines-for-Vegans.aspx>.

⁹ Susan Lunn, “New federal healthy eating strategy may lead to warning symbols on your cheese” *CBC News* (June 21, 2017) www.cbc.ca/news/politics/federal-food-guide-changes-healthy-eating-1.4170245.

¹⁰ Health Canada, “Eating Well With Canada’s Food Guide” www.hc-sc.gc.ca/fn-an/alt_formats/hpfb-dgpsa/pdf/food-guide-aliment/view_eatwell_vue_bienmang-eng.pdf

¹¹ Meagan Campbell, “The dangers of our protein diet obsession” *Macleans* (October 4, 2015) www.macleans.ca/society/life/the-dangers-of-our-protein-diet-obsession/.

¹² Agriculture and Agri-Food Canada, “Per capita disappearance” www5.agr.gc.ca/eng/industry-markets-and-trade/market-information-by-sector/poultry-and-eggs/poultry-and-egg-market-information/industry-indicators/per-capita-disappearance/?id=1384971854413.

¹³ OECD, “Meat Consumption” <https://data.oecd.org/agroutput/meat-consumption.htm>.

¹⁴ Kelly Crowe, “Health Canada’s quiet move to end use of antibiotics to fatten up animals” *CBC News* (July 9, 2014) www.cbc.ca/news/health/health-canada-s-quiet-move-to-end-use-of-antibiotics-to-fatten-up-animals-1.2700972

- Antibiotic resistance is one of the biggest threats to global health, food security, and development today.
- A growing number of infections – such as pneumonia, tuberculosis, and gonorrhoea – are becoming harder to treat as the antibiotics used to treat them become less effective.
- Antibiotic resistance leads to longer hospital stays, higher medical costs and increased mortality.

The WHO advises the animal agriculture sector not use antibiotics for growth promotion or to prevent disease.¹⁵

Methicillin resistant *Staphylococcus aureus* (MRSA) is considered a concerning superbug responsible for a number of untreatable or difficult-to-treat infections in humans.¹⁶ In 2008, researchers in Ontario discovered MRSA colonization in 45 percent of pig farms, 24.9 percent of pigs, and 20 percent of pig farmers.¹⁷ According to the Ontario researchers, “This study demonstrates that MRSA is common in pigs in Ontario, Canada, and provides further support to concerns about transmission of MRSA between pigs and humans.”

Food-borne pathogens like salmonella, *E. coli*, listeria, and campylobacter originate in the intestinal tracts of farmed animals.¹⁸ Each year, about 4 million (1 in 8) Canadians are affected by food-borne illnesses, leading to 11,600 hospitalizations and 238 deaths.¹⁹

Animal agriculture also directly contributes to pandemics and pandemic risks. According to World Bank:

Pathogens with pandemic potential continue to emerge, and most of them are of animal origin (zoonotic). During the past 10 years alone the world has witnessed, among others, H5N1 avian flu, H7N9 avian flu, and two kinds of coronavirus:

¹⁵ World Health Organization, “Antibiotic resistance” (October 2016) www.who.int/mediacentre/factsheets/antibiotic-resistance/en/.

¹⁶ Wikipedia, “Methicillin-resistant *Staphylococcus aureus*” https://en.wikipedia.org/wiki/Methicillin-resistant_Staphylococcus_aureus.

¹⁷ Khanna T, Friendship R, Dewey C, Weese JS, “Methicillin resistant *Staphylococcus aureus* colonization in pigs and pig farmers” *Vet Microbiol.* 2008 Apr 30;128(3-4): 298-303 online: <https://www.ncbi.nlm.nih.gov/pubmed/18023542>.

¹⁸ Physicians Committee for Responsible Medicine, “Antibiotic Resistance from Animal Agriculture: Foodborne Illness and Medical Care, www.pcrm.org/health/health-topics/animal-agriculture-resistant-pathogens-food-supply.

¹⁹ Government of Canada, “Yearly food-borne illness estimates for Canada” <https://www.canada.ca/en/public-health/services/food-borne-illness-canada/yearly-food-borne-illness-estimates-canada.html>.

severe acute respiratory syndrome- SARS and Middle East Respiratory Syndrome -MERS.²⁰

Plant-based agriculture minimizes the antibiotic resistance, food-borne illnesses, and pandemic risks associated with farming animals, particularly intensively.

Thank you for your attention. We would be pleased to further participate in the development of A Food Policy for Canada.

Yours truly,



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²⁰ The World Bank, "Pandemic Risk and One Health" www.worldbank.org/en/topic/health/brief/pandemic-risk-one-health.