



Mario Dion

Conflict of Interest and Ethics Commissioner

Office of the Conflict of Interest and Ethics Commissioner

Parliament of Canada

Centre Block, P.O. Box 16

Ottawa, Ontario K1A 0A6

CONFLICT OF INTEREST ACT CONTRAVENTIONS: MINISTER OF PUBLIC SAFETY RALPH GOODALE AND THE PRISON FARM ADVISORY PANEL

July 27, 2018

Dear Mr. Dion,

We are writing to report contraventions of the Conflict of Interest Act as it applies to Public Safety Minister Ralph Goodale and public office holders appointed by him to advise on the return of Correctional Service Canada's prison farm program. In this letter we will explain the circumstances and evidence of the breaches, and we formally request that you investigate this matter, on your own initiative, in defence of justice and Canadian democratic values.

In 2016, the federal government launched a feasibility study and public consultation process into reopening prison farms, which falls under the purview of Minister of Public Safety Ralph Goodale. In 2017, Minister Goodale appointed an advisory panel "to help us determine the best way ahead for re-establishing penitentiary farms."

The Prison Farm Advisory Panel was composed exclusively of leadership and supporters of the activist group Save Our Prison Farms, despite clear Conflict of Interest Act rules prohibiting Minister Goodale from "providing preferential treatment to any person or organization based on the identity of the person or organization." (s. 7)

All appointed members of the panel were prison dairy advocates, and the majority were livestock farmers, suggesting that only animal agriculture was under consideration. Our group, Evolve Our Prison Farms, advocating ethical and environmentally sustainable models for the rehabilitation program, immediately issued a letter to Minister Goodale expressing concern over the composition of the panel:

"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. Given that several members of the panel have already made clear that their single-minded goal is reinstatement of animal agriculture, the panel as it stands fails the test.

We call on you to ensure more balanced representation and less biased consideration of the options."

No response or review was issued, and the advisory panel proceeded to work in direct collaboration with CORCAN and Minister Goodale. To date, Minister Goodale has refused to meet or speak with our group, despite our many letters, meeting requests, phone calls, petitions and report submissions.

In March 2018, it was announced that prison goat dairy operations would be established at Joyceville Institution in Kingston, involving up to 1,500 goats, with milk being destined for the Feihe International infant formula factory to be processed and shipped to China.

The Save Our Prison Farms activists, while still engaged as members of the Prison Farm Advisory Panel, immediately and publicly lobbied for Minister Goodale to add cow dairy to the prison farms. In June 2018, in direct response to this pressure, it was announced that up to 60 cows would be added. Currently, these public office holders are lobbying to sell the descendants of the former “Pen Herd” cows – which they own – to the government for the prison farm program.

Minister Goodale is clearly bound by the Conflict of Interest Act, as is emphasized in his Mandate Letter from Prime Minister Justin Trudeau (November 2015):

“As Minister, you must ensure that you are aware of and fully compliant with the Conflict of Interest Act... As noted in the Guidelines, you must uphold the highest standards of honesty and impartiality.”

The Mandate Letter also points to the priorities that Minister Goodale is expected to uphold, including:

“constructive dialogue with Canadians, civil society, and stakeholders... the broader public sector... and identifying ways to find solutions and avoid escalating conflicts unnecessarily...”

If we are to tackle the real challenges we face as a country – from a struggling middle class to the threat of climate change – Canadians need to have faith in their government’s honesty and willingness to listen.”

The Conflict of Interest Act also applies to members of the Prison Farm Advisory Panel, as follows:

- The definition of public office holder includes (c) a ministerial adviser;
- A ministerial adviser includes a person who provides policy, program or financial advice to a minister, whether or not the advice is provided on a full-time or part-time basis and whether or not the person is entitled to any remuneration or other compensation for the advice;
- As such, the appointed members of the Prison Farm Advisory Panel constitute public office holders and are bound by the Conflict of Interest Act;
- Members of the Prison Farm Advisory Panel are therefore not permitted to exercise their power, duty or function to further their private interests.

The following are clear instances of contravention:

- Minister Ralph Goodale appointed a panel composed of members of a single advocacy group, in breach of **[7] Preferential treatment: No public office holder shall, in the exercise of an official power, duty or function, give preferential treatment to any person or organization based on the identity of the person or organization.**
- After the goat dairy decision was announced for Joyceville, members of the Prison Farm Advisory Panel who are leaders of the activist group Save Our Prison Farms and shareholders in the Pen Herd Co-Operative which owns the descendants of the Pen Herd cows, publicly lobbied Minister Goodale to add cow dairy and to purchase their cows for the program, in breach of **[9] Influence: No public office holder shall use his or her position as a public office holder to seek to influence a decision of another person so as to further the public office holder’s private interests** and **[16] Fundraising: No public office holder shall personally solicit funds from any person or organization if it would place the public office holder in a conflict of interest.**

The following are instances where further breaches may occur, but which lack public evidence as yet:

- According to the Kingston Economic Development Commission (KEDCO), there are only two major goat dairy brokers in Ontario. Although the KEDCO employee responsible for the Feihe file could not confirm which broker would be buying the milk from Joyceville Institution, she indicated that there are conveniently a handful of smaller independent goat dairy brokers, one of which is Mariposa Dairy, whose owner is an appointed member of the Prison Farm Advisory Panel. **If the sale of milk from Joyceville Institution involves Mariposa Dairy in any way, it would be in breach of multiple Conflict of Interest Act rules.**
- If Minister Goodale agrees to purchase the Pen Herd cows for the prison farm program as a result of the public activism of Save Our Prison Farms leaders while they were bound by and contravening Conflict of Interest Act rules as public office holders, such a decision by Minister Goodale would be in breach of **[21] Duty to recuse: A public office holder shall recuse himself or herself from any discussion, decision, debate or vote on any matter in respect of which he or she would be in a conflict of interest.**

When Evolve Our Prison Farms met with Kingston MP Mark Gerretsen in February 2017, he informed us that “unless you are Save Our Prison Farms, the government isn’t going to listen to you.” These words have proved true.

All matters weighed, the decisions and actions taken by Minister Goodale, and the structure and actions of the Prison Farm Advisory Panel, contravene Conflict of Interest Act rules, betray the Minister’s mandate, prevent constructive dialogue, escalate conflict, and fail to tackle the challenges that we face as a country.

Prison farms are a federal program that will carry significant rehabilitative, environmental, and social impacts. The future of this Corrections program should not be dictated according to the private interests of a small group of local livestock farmers, yet this is precisely what is occurring.

We appeal to you, Mr. Dion, as Conflict of Interest and Ethics Commissioner, to “enhance the trust and confidence of the Canadian public in the conduct of elected and appointed officials” by investigating this matter on the grounds laid out above.

It would represent a great tragedy for Canada if this is how we conduct matters of democracy and rehabilitation. Private interests must not be permitted to direct the process and outcome of federal correctional programs, or to suppress opportunities and advantages that lie in underexplored possibilities for our prison farms.

Respectfully,



Calvin Neufeld & Franceen Neufeld
Co-Founders, Evolve Our Prison Farms

CC:

Justin Trudeau, Prime Minister of Canada
Ralph Goodale, Minister of Public Safety and Emergency Preparedness
Anne Kelly, Interim Commissioner of the Correctional Service of Canada
Ivan Zinger, Correctional Investigator of Canada



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

CONFIDENTIAL

August 21, 2018

Sent by email to: info@calvinneufeld.com

Franceen Neufeld and Calvin Neufeld
Co-Founders, Evolve Our Prison Farms
57 Foster Street, Box 2012
Perth, Ontario K7H 1R9

Subject: Request for an examination into the conduct of the Honourable Ralph Goodale and the members of an advisory panel

Dear Ms. and Mr. Neufeld:

I am writing in response to your letter dated July 27, 2018 requesting that I investigate the conduct of the Honourable Ralph Goodale, P.C., M.P., Minister of Public Safety and Emergency Preparedness, and the conduct of the members of the advisory panel for the reopening of penitentiary farms at the Collins Bay and Joyceville institutions. You wrote that the members of the advisory panel may have contravened sections 9 and 16 of the *Conflict of Interest Act* (Act), while Mr. Goodale may have contravened section 7 of the Act and, potentially, section 21 of the Act.

Section 9 of the Act prohibits public office holders from using their position to seek to influence the decision of another person so as to further private interests. Section 16 of the Act prohibits public office holders from personally soliciting funds if it would put them in a conflict of interest.

... / 2

As indicated in a news release dated May 11, 2017, Correctional Service Canada (CSC) announced the establishment of an advisory panel to provide advice about the potential reopening of penitentiary farms at the Collins Bay and Joyceville institutions. According to that news release, panel members were to engage with community stakeholders to help a rehabilitation program of CSC to “better understand farm industry operations, explore new business ideas, and promote partnerships to provide employment opportunities for released offenders.” According to public sources, CSC established the advisory panel, which reports directly to CSC in relation to the penitentiary farms.

In your letter, you wrote that the members of the advisory panel are public office holders as they fall within the scope of the definition of “ministerial advisers” as set out in the Act. You ask that I investigate whether those members, namely Ms. Bridget Doherty, Ms. Dianne Dowling, Ms. Catherine Latimer, Mr. Jeff Peters, Mr. Alec Ross, Mr. Tony Straathof and Mr. Bruce Vandenberg, have contravened sections 9 and 16 of the Act.

The definition of a ministerial adviser in section 2 of the Act reads as follows:

ministerial adviser means a person, other than a public servant, who occupies a position in the office of a minister of the Crown or a minister of state and who provides policy, program or financial advice to that person on issues relating to his or her powers, duties and functions as a minister of the Crown or a minister of state, whether or not the advice is provided on a full-time or part-time basis and whether or not the person is entitled to any remuneration or other compensation for the advice. (conseiller ministériel)

As the members of the advisory panel do not occupy a position in the office of a minister, nor do they report to a minister, they do not fall within the definition of a ministerial adviser and, as such, are not subject to the Act. Consequently, the conduct of the advisory panel’s members lies outside the jurisdiction of this Office.

I also note that the government can, pursuant to section 62.2 of the Act, designate any person or class of persons as public office holders or reporting public office holders, but did not do so in respect of any member of this advisory panel.

You also ask that I consider whether Mr. Goodale contravened section 7 of the Act, which reads as follows:

7 No public office holder shall, in the exercise of an official power, duty or function, give preferential treatment to any person or organization based on the identity of the person or organization that represents the first-mentioned person or organization.

According to your letter, Mr. Goodale is in breach of section 7 of the Act because he appointed a panel that includes members of a single advocacy group, Save Our Prison Farms.

According to the information my Office has gathered, Mr. Goodale did not appoint the members of the advisory panel as the advisory panel was established by CSC. As Mr. Goodale did not exercise any official power in relation to the appointment of the members of the advisory panel, section 7 of the Act does not apply.

In your letter, you also refer to potential further breaches of the Act by Mr. Goodale “which lack public evidence as of yet.” Allegations based on a possibility that there may be a contravention without any supporting evidence cannot give reason to believe that a contravention may have occurred.

For the above reasons, I will not be taking any further action in this matter at this time.

As you made your request for an investigation public by posting it on the Evolve Our Prison Farms website, I will provide Mr. Goodale with a copy of this letter.

Should you have any questions or require further clarification, please do not hesitate to contact Mr. Philippe Joly, Senior Investigator, at 613-996-6012.

Sincerely,

A handwritten signature in black ink, appearing to read "Mario Dion". The signature is fluid and cursive, with a large, stylized "D" at the end.

Mario Dion
Conflict of Interest and Ethics Commissioner

c.c.: The Honourable Ralph Goodale, P.C, M.P.

Calvin Neufeld

From: Calvin Neufeld <info@calvinneufeld.com>
Sent: May 2, 2019 9:00 AM
To: ciec-ccie@parl.gc.ca
Cc: CIEInvestigations@cie.parl.gc.ca; justin.trudeau@parl.gc.ca; Hon.ralph.goodale@canada.ca; anne.kelly@csc-scc.gc.ca; Hartle Kelly (NHQ-AC); Ivan.Zinger@OCI-BEC.GC.CA; [REDACTED]
Subject: Prison Farms: Further Evidence of Conflict of Interest Act Contraventions
Attachments: Letter to Commissioner Dion May 2 2019.pdf; Evidence 1 - Undated Letter pgs 88-91.pdf; Evidence 2 - Letter from Bridget Doherty p 250.pdf; Evidence 3 - Letter from Jeff Peters p 220.pdf; Evidence 4 - Letter from Dianne Dowling p 247-248.pdf; Evidence 5 - Letter from Bridget Doherty p 226-227.pdf

Dear Commissioner Dion,

Pursuant to our Conflict of Interest complaint submitted July 27 2018, and your conclusions issued August 21 2018, we are hereby submitting a subsequent report with further evidence detailing contraventions of the Conflict of Interest Act by Minister of Public Safety Ralph Goodale in regard to his involvement in exercising preferential treatment in the selection and appointment of the Prison Farm Advisory Panel.

We are formally requesting that you reopen your investigation in light of the new evidence submitted here.

For the time being we are not making this letter publicly available. We hope that you can understand our position. We have respect and appreciation for the individuals involved, yet due democratic process has not been followed, with serious consequences for prisoners, animals, and the environment. Minister Goodale persistently refuses to meet or speak with our group, despite our many letters, meeting requests, petitions and report submissions since the beginning of this process three years ago. Meanwhile, Save Our Prison Farms activists, while still engaged as members of the Prison Farm Advisory Panel, continue to have the exclusive ear of our government, meeting with and publicly soliciting Minister Goodale and CSC to purchase their cows for the prison farm program. In 2018, they were successful in lobbying the government to overturn its publicly announced decision to establish prison farms as goat dairy operations without cows. In direct response to this pressure, the government amended its plan to ensure that their cows could be included. If the panel exists merely to provide non-binding and objective advice, they would not have such leverage to alter decisions at the highest levels of government to advance their special interest objectives, while contributing to the alienation of other groups who have worked diligently and professionally to offer other models for consideration.

Thank you for your attention to this matter of national importance.

Respectfully,

Calvin Neufeld & Franceen Neufeld
Co-Founders, Evolve Our Prison Farms

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Evolve Our Prison Farms
www.evolveourprisonfarms.ca
www.facebook.com/EvolveOurPrisonFarms



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Ottawa, Ontario K1A 0A6

**SUBJECT: REQUEST FOR RE-INVESTIGATION INTO THE CONDUCT OF MINISTER OF PUBLIC SAFETY
RALPH GOODALE WITH REGARD TO THE PRISON FARM ADVISORY PANEL**

May 2, 2019

Dear Commissioner Dion,

We are responding to the conclusions of your investigation into the conduct of Minister Ralph Goodale regarding conflicts of interest in the appointment of the Prison Farm Advisory Panel, composed exclusively of people identified with Save Our Prison Farms and the Pen Herd Co-operative.

In our letter dated July 27 2018, we argued that Minister Goodale contravened section 7 of the *Conflict of Interest Act*, which prohibits “providing preferential treatment to any person or organization based on the identity of the person or organization.”

In your response dated August 21 2018, you concluded: “According to the information my Office has gathered, Mr. Goodale did not appoint the members of the advisory panel... As Mr. Goodale did not exercise any official power in relation to the appointment of the members of the advisory panel, section 7 of the Act does not apply.”

Through Access to Information, we now have evidence of Minister Goodale’s direct involvement in the process, which we believe warrants reopening the investigation. We draw your attention to the following portions of the enclosed documents, which provide evidence that:

1. Leaders of Save Our Prison Farms and the Pen Herd Co-op repeatedly campaigned for Minister Goodale to appoint them to an advisory role.
2. Prior to the establishment of the Prison Farm Advisory Panel, Minister Goodale met with leaders of Save Our Prison Farms and the Pen Herd Co-op on multiple occasions to discuss collaboration, including participation in a prison farms advisory committee.
3. The invitation to sit on the Prison Farm Advisory Panel came from Minister Goodale.

“Members of the Herd Co-Op and supporters of the Save Our Prison Farms campaign are willing to serve on an advisory panel to assist in the development, implementation and continuation of the prison farm program.” (p. 90)

- Signed “Dianne Dowling, for the directors of the Pen Farm Herd Co-op” (Undated)

“Dear Minister Goodale, We are writing to **thank you for the upcoming meeting**... to discuss re-establishing the prison farm at Collins Bay Institution in Kingston... **We look forward to working with you, our MP Mark Gerretsen, and your government [to] bring the cows home...**” (p. 250)

- Signed “Bridget Doherty, On behalf of The SAVE OUR FARMS Campaign” (February 12 2016)

“**Our campaign team is offering any assistance possible** in the review of this program... We also extend an invitation for you to come to the Kingston area to see some of the prison farm cows we own, as well as tour the original farm at Collins Bay.” (p. 220)

- Signed “Jeff Peters, Chairman of the Pen Farm Herd Co-op” (April 7 2016)

“Thank you for your attendance at the prison farms town hall meeting in Kingston, August 16... **During our meeting with you following the town hall gathering, you referred to the potential for partnerships that could be established...** We certainly are in favour of working with Correctional Service Canada **in an advisory role...**” (p. 247) “**We welcome the opportunity to work with your Ministry** and with CSC in developing more detailed options and plans for the farm, **including, if you wish, participation in a prison farms advisory committee...**” (p. 248)

- Signed “Dianne Dowling, on behalf of the Save Our Prison Farms committee and the Pen Herd Co-op” (September 1 2016)

“**Dear Minister Goodale, You invited us to sit on the Prison Farm panel...**” (p. 227)

- Signed “Bridget Doherty, On behalf of the Save Our Prison Farms campaign” (January 24 2018)

In your letter, you cited a news release dated May 11 2017, in which Correctional Service Canada (CSC) “announced” the establishment of the advisory panel. In our view, the terminology of this release does not support the conclusion that Minister Goodale “did not exercise any official power” in the selection and/or appointment of panel members. Indeed, in this same news release, he appears to take credit for the establishment of the panel:

“**I am very pleased that we have established this advisory panel** to help us determine the best way ahead for re-establishing penitentiary farms.”

- The Honourable Ralph Goodale, Minister of Public Safety and Emergency Preparedness, Newswire, May 11 2017 <https://www.newswire.ca/news-releases/advisory-panel-for-the-reopening-of-penitentiary-farms-at-collins-bay-and-joyceville-institutions-announced-622051503.html>

We also draw your attention to numerous other media articles crediting Minister Goodale with the appointment of the panel:

“**Jeff Peters, a beef producer at Inverary, Ont., has been appointed to a panel by federal Public Safety Minister Ralph Goodale.**”

- Canadian Cattlemen, June 13 2017 <https://www.canadiancattlemen.ca/2017/06/13/canada-beef-welcomes-a-new-executive-vice-president/>

“**Dowling is co-chair of the Prison Farm Advisory Council that was struck by Goodale in 2017.**”

- iPolitics, June 21 2018 <https://ipolitics.ca/2018/06/21/the-cows-are-coming-home-two-prison-farms-to-reopen-in-kingston/>

“**In 2017, Minister Goodale appointed a prison farm advisory panel**”

- AgriNews, July 4 2018 <https://agrinews.ca/prison-cows-coming-home/>

Anecdotally, in a meeting with Kingston MP Mark Gerretsen on February 28 2017, Mr. Gerretsen told us candidly that “Minister Goodale has regular phone calls with Dianne Dowling” and added that he has “never seen someone at that level routinely calling a private citizen to discuss matters of policy.”

We therefore maintain the following: that there is a transparent trail of evidence connecting Minister Goodale with the process of selecting and appointing the panel members; that the selection was directly related to their identities with Save Our Prison Farms and the Pen Herd Co-op; that this is well known among members of the Kingston community; and that any effort on the part of Minister Goodale to distance himself from the process did not occur prior to our Conflict of Interest complaint.

We therefore also have reason to believe that Minister Goodale provided false or misleading information to the Ethics Commissioner in the course of your investigation last year.

For the reasons outlined above, we hereby request that your investigation be reopened in light of the evidence that Minister Goodale’s actions are in contravention of section 7 of the *Conflict of Interest Act*.

Furthermore, if Minister Goodale has indeed provided false or misleading information to the Ethics Commissioner, we urge your Office to take immediate and appropriate action.

As campaigners for an alternative model for the prison farms, we at Evolve Our Prison Farms have experienced a persistent pattern of exclusion from this process, exacerbated by an advisory panel with deep-seated personal and professional objections to our proposal for animal-assisted therapy as an alternative to animal agriculture. There are reasons why the *Conflict of Interest Act* specifically prohibits preferential treatment based on a person’s identity or affiliation. If the government had taken a balanced, open, and non-partisan approach in establishing the Prison Farm Advisory Panel, these and other complications could have been avoided. The selected model for the prison farms (intensive dairy, reportedly to supply infant formula for the Chinese market) surely would have been substantially different if the panel had allowed healthy diversity. This failure to adhere to democratic principles isn’t just a procedural problem; it has prejudiced the entire process and outcome, and presented a barrier against perspectives that do not align with the objectives of the aforementioned special interest groups.

Commissioner Dion, please ensure that the *Conflict of Interest Act* is honoured, in the letter and the spirit of the law, so that our government does not neglect its obligation to “*uphold the highest standards of honesty and impartiality.*”

Respectfully,



Calvin Neufeld & Franceen Neufeld
Co-Founders, Evolve Our Prison Farms

CC:

Justin Trudeau, Prime Minister of Canada
Ralph Goodale, Minister of Public Safety and Emergency Preparedness
Anne Kelly, Commissioner of the Correctional Service of Canada
Kelly Hartle, CEO of CORCAN
Ivan Zinger, Correctional Investigator of Canada

A Model for the Restoration of the Prison Farm Program at Collins Bay and Joyceville Institutions

submitted by directors of the Pen Farm Herd Co-op, Kingston

The Value of the the Prison Farm Program

The prison farm program, as it operated before its closure in 2010, had positive effects for the Correctional Service Canada (CSC), for inmates and for all Canadians. It is time to restore the prison farms as a progressive, effective, humane corrections program, where inmates have the opportunity to grow and change in a meaningful endeavour.

Inmates who participated in the program gained skills such as: operation, maintenance and repair of equipment; food processing, including safe food handling; animal husbandry; and practical application of trades skills learned in the prison workshops (welding, electrical, plumbing, carpentry etc).

In addition, inmates learned employability skills such as being reliable and responsible for proper completion of tasks, working alone and in a team, relating with work supervisors and co-workers, being on time and working toward medium and longer term goals.

Thirdly, inmates, CSC staff and others in contact with inmates reported positive changes in attitudes and behaviors as a result of improved self-concept, empathy and understanding. These qualities contributed to reducing stress and conflict within the institution, increasing safety for staff, inmates and visitors.

The acquisition of this combination of knowledge, skills and attitudes allowed inmates to be more employable after release and helped inmates to integrate into Canadian communities. As a result, the prison farm program helped CSC meet the goals of contributing to the rehabilitation of inmates and to reducing the incidence of re-offending (recidivism), making Canadian society safer.

We believe that all these benefits would be realized in a restored prison farm program, and that a proactive approach to integrating other community resources with the farm program would increase the advantages for CSC and for the community at large.

Consequently, we advocate that CSC and the Ministry of Public Safety regard the prison farm program as an effective correctional and training program that leads to inmates being more employable in a wide variety of jobs, and better suited to integrating into the community upon release. The prison farm program should not be seen as an agriculture training program, although inmates could work in agriculture and agriculture-related businesses while serving their sentences or after release.

The Prison Farm Model

At the town hall meeting in Kingston in August, 2016, the consultants reported a high percentage of respondents to the online survey said they believed farming plays a particularly valuable role in programming for inmates. We agree.

A. Stage One -- highest priority action -- restoring the dairy farm

We propose that CSC restore the prison farm program at Collins Bay and Joyceville Institutions in stages, beginning as a dairy farm at a smaller scale than in the past. The main operations of the farm at Collins Bay Institution will be a dairy herd of 40 to 60 cows and a cheese-making plant, with the cheese used within the prison system and donated to food banks in the area. Cheese-making creates a product that is easier to handle and less perishable than fluid milk; as well, inmates will learn skills that could lead to post-release employment in the cheese industry, or in food processing in general.

A small pork operation will be established to make use of the whey from the cheese-making operation. Crops will be grown to feed the dairy and pork herds, with the possibility of any surplus crops being sold.

Inmates will be involved in growing, processing, cooking and eating the food, developing valuable work and life skills and creating a sense of wholeness and completion in the work. We advocate that the prison farms include both plant and animal farming activities, because the two interconnect and support each other (crops feed animals and animal manure feeds the soil that crops grow in). Furthermore, animal therapy is well established as a means to improve mental health. With a significant percentage of inmates with mental health concerns, we believe that working in close contact with animals (such as dairy farming involves) could be very important to the rehabilitation and healing of inmates.

Work on the farm will provide opportunities for inmates to earn certification in job skills such as cheese-making and safe food-handling, as well as certification in many other safety and training courses that are applicable across a wide range of industries (eg. WHMIS courses in safety, equipment operation and workplace regulations).

Maintaining the abattoir at Joyceville is essential to integrating the production, processing and use of food from the prison farm; as well, the abattoir is a critical service to many farmers in the region because it allows them to market their livestock to local customers (individuals, restaurants and butcher shops) at a better return than selling in the conventional livestock market. Continuing the abattoir service is critical to the success of the prison farm and to the local farm economy.

B. Stage Two -- adding other agricultural operations and exploring collaborations with community partners

i) The farms will eventually form a balanced, integrated, diversified and sustainable system that is connected within and between the two farms, and with other organizations in the Kingston area. Livestock other than dairy cattle -- for example, beef cattle, chickens (for meat and eggs), sheep or goats -- could be raised at Collins Bay or Joyceville Institutions.

Products (other than eggs and cheese) that are surplus to the needs of the prison system could be sold to other federal departments or possibly in the open market.

Eventually, vegetable production in greenhouses and gardens, fruit orchards and bee-keeping could be incorporated into the farms, allowing inmates to learn life skills and job skills useful in Canada's agriculture and food sector.

ii) When the dairy and cheese operations are well-established, CSC could develop additions to the prison farm program through collaborations with community partners.

St. Lawrence College (SLC), Kingston, offers renewable energy and culinary programs that could be integrated with the prison farms at Collins Bay and Joyceville.

Working with SLC staff and students, renewable energy projects (eg. wind, solar and biogas) could be established at the farms and inmates could complete training (online and on-site) in construction and operation of these projects. The energy produced would be used on site to reduce operating costs for the institution.

Similarly, inmates could complete culinary courses, online and on-site, in food storage, handling and preparation, thus gaining valuable job and life skills.

Other links to the renewable energy economy in the Kingston area could be made through contacts with Switch, "a network of businesses, research and educational institutions, public sector participants, and community-minded volunteers dedicated to making Southeastern Ontario a leading centre for sustainable energy" <<http://www.switchontario.ca>>

Queen's University and KEDCO (Kingston's economic development organization) work together for innovation and economic development, including in agriculture and food. There may be opportunities to collaborate with these organizations in the fields of social service, corrections, technology or other fields.

Agriculture Canada research stations may be interested in working with the inmates on research projects; in the US, such collaborations have been beneficial to both the research organizations and to the inmates.

Costs for Restoration of the Dairy Herd and a Cheese-making Facility

The federal government realized revenue from the sale of the prison farm assets in 2010; that money should be allocated to the restoration costs.

Engineering studies may show that at least one of the barns at Collins Bay can be refurbished for a role in the dairy operation -- a heifer or calf facility, or for the milking cows.

Should new barn construction be required, we are aware of two local family farms that recently constructed tie stall barns for about 80 cows; each was built for less than one million dollars. We believe restoring the necessary dairy infrastructure is possible without being cost-prohibitive. The same applies to building a cheese-making facility.

Support for the Restoration Process

Members of the Herd Co-op and supporters of the Save Our Prison Farms campaign are willing to serve on an advisory panel to assist in the development, implementation and continuation of the prison farm program in the Kingston area. We can offer expertise in farm

infrastructure and operations, and familiarity with community resources that could assist in making the restored prison farms successful.

For instance, we have contacts with a dairy farm in the Kingston area that has a small on-farm cheese-making plant. As well, a qualified cheese-maker has offered to work with CSC to develop and operate the cheese facility.

One of our Co-op directors is active in representation at Dairy Farmers of Ontario (DFO) meetings. We understand that DFO will be making a decision on their position on restoring the prison farm dairy operation at their next board meeting. We believe that DFO will support the initiative described here because it is the option most acceptable to the dairy industry.

Thank you for the opportunity to give input on a model for the restored prison farm program in Kingston. We welcome the chance to discuss the submission further and to facilitate the restoration process.

Respectfully,
Dianne Dowling, for the directors of the Pen Farm Herd Co-op
613-546-0869

02/12/2016 12:39 6135319805

SISTERS OF PROVIDENCE

PAGE 02/02

The Honourable Ralph Goodale
House of Commons Ottawa,
Ontario, Canada
K1A 0A6

February 12, 2016

Dear Minister Goodale,

DOC:	GDL-002097
OP/BPR:	CSCCB
D.D./D.E:	3-16-2016
ACTION:	REPLY
FILE #/DOSSIER:	4000-1

We are writing to thank you for the upcoming meeting with our new member of parliament, Mark Gerretsen. We are very pleased that you are taking the time to discuss re-establishing the prison farm at Collins Bay Institution in Kingston.

As you are aware, the prison farm program offered valuable employment and rehabilitation for inmates who are ultimately returned back into our community. Working with the cows was animal therapy, a very successful form of anger management and rehabilitation. The farms also offered inmates skills in a variety of areas, from machine maintenance to shipping and receiving.

Since the cows have been removed, members of our local community have been holding a weekly vigil. Every Monday evening they stand at a street corner in front of the institution with signs, for example, "Farm skills = Life skills". A reporter from the New York Times, who came last month to document the prison farm campaign, was surprised to discover that passing drivers started honking before the vigil keepers even had a chance to set up. The Kingston community sees these farms as a program that keeps our community safer.

Mr. Gerretsen will be forwarding you a copy of the documentary "Til the Cows Come Home", explaining the value of the prison farm programs and our efforts to save the farms. We hope you can find the time to view the film before the meeting.

We also sent you an information pamphlet "Pen Farm Herd Coop", which details how a large group of our members have successfully sustained a nucleus of the heritage herd of Holsteins with the goal of returning them to the restored prison farm at Collin's Bay.

We look forward to working with you, our MP Mark Gerretsen, and your government bring the cows home and see a meaningful rehabilitation program return to our community.



Bridget Doherty
Bridget.doherty@providence.ca
On behalf of: The SAVE OUR FARMS Campaign

COPY TO: Mark Gerretsen, Mark Holland, Wayne Easter

RECEIVED 12-02-16 11:53 FROM- 6135319805

TO-

P0002/0002
000250

April 7, 2016

APR 14 2016

DOC	GDL-003641
OP/EP/R	CSC
D.O./D.E.	5-19-2016
ACTION	REPLY
FILE #/# COSSIER	5350-2

To the Honourable Ralph Goodale,

Congratulations on your re-election as a Member of Parliament, and your appointment as Minister of Public Safety.

I am part of the campaign team that has continued to pursue the goal of restoring the prison farms in Kingston since their closing in 2009. I also serve as chairman of the Pen Farm Herd Co-op, a group of 200 members who own some of the original herd and their descendents.

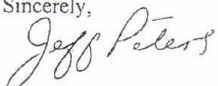
In recent media coverage from the New York Times and the CBC, it is evident that your ministry is undertaking a review of the dairy farm at Collins Bay Institution and will evaluate the viability of re-opening that prison farm program.

s.19(1)

Our campaign team is offering any assistance possible in the review of this program that successfully rehabilitated inmates and ultimately made our communities safer. We also extend an invitation for you to come to the Kingston area to see some of the prison farm cows we own, as well as tour the original farm at Collins Bay Institution.

We greatly appreciate the work of our former and present MPs, Ted Hsu and Mark Gerretsen, in advocating for restoration of the prison farm program in Kingston, and look forward to further discussion with you and your staff on this matter.

Sincerely,



Jeff Peters
Chairman
Pen Farm Herd Co-op
(613) 353-2403

DOC.GDL-005425
FILE #/ DOSSIER 5350-2
COPY/COPIE CSC
Add-To-A

From: Public Safety MCU / Sécurité publique UCM (PS/SP)
To: Arsenault, Roger (PS/SP)
Subject: FW: Response from prison farms groups in Kingston
Date: Thursday, September 01, 2016 11:21:04 AM

Add-to to GDL005425 with copy to CSC.

Nathalie

From: Goodale, Ralph E. - M.P. [mailto:ralph.goodale@parl.gc.ca]
Sent: Thursday, September 01, 2016 9:47 AM
To: Public Safety MCU / Sécurité publique UCM (PS/SP)
Subject: FW: Response from prison farms groups in Kingston

From: P & D Dowling [mailto:dowling@kos.net]
Sent: September 1, 2016 9:47 AM
To: Goodale, Ralph E. - M.P.
Cc: Justine Villeneuve; Gerretsen, Mark - M.P.
Subject: Response from prison farms groups in Kingston

To the Hon. Ralph Goodale, Minister of Public Safety and Emergency Preparedness,

Thank you for your attendance at the prison farms town hall meeting in Kingston, August 16. We greatly appreciate your engagement in the feasibility study for the restoration of the two prison farms in Kingston. At the town hall meeting, you were able to hear first hand how committed people in the Kingston area are to this issue.

During our meeting with you following the town hall gathering, you referred to the potential for partnerships that could be established at the farms. We certainly are in favour of working with Correctional Service Canada (CSC) in an advisory role, or for businesses, institutions and organizations to partner on aspects of the program.

However, we are very concerned that you may be considering the idea of removing the operation of the farms from CSC. We are completely opposed to this possibility. The prison farm program worked well under CSC's management, and rightly belongs as a correctional program under CSC's mandate to provide inmates with effective rehabilitation and re-integration into society. Community participation in a renewed prison farm program is attractive for many reasons, but, to succeed, the program needs to stay under strong, progressive and proactive leadership from CSC.

We see the restoration of the prison farms at Collins Bay and Joyceville Institutions as an opportunity for your government to set a new course for corrections in Canada. Kingston has been called the prison capital of Canada -- we would rather be known as the capital of progressive rehabilitation and restorative justice, and the home of a model that can be adopted or adapted to other facilities.

We believe that CSC should have a farm manager, who is an experienced farmer, and farm supervisors for each institution, to run the program fully integrated with other rehabilitation

and work training programs at the institution. The farm should be developed to offer as many work and training opportunities as possible to inmates, fully integrating the production and processing of the food, as well as, ideally, its preparation and consumption. The therapeutic potential of growing and working with food has been demonstrated in many situations, including the past history of the prison farms.

We welcome the opportunity to work with your Ministry and with CSC in developing more detailed options and plans for the farm, including, if you wish, participation in a prison farms advisory committee, with members who have expertise and experience in farming. We are enthusiastic about the potential in working, in the future, with groups such as educational institutions (for example, Queen's University and St. Lawrence College), community organizations, federal agricultural research stations, green energy businesses, the trades and so on.

We understand that CSC needs time to complete the feasibility study, analyze its results and communicate recommendations to you, for a decision on the future of the prison farms. Should that decision be to restore the prison farms, and we urge you to do so, we are ready to work with your Ministry and with CSC to move the project forward as quickly as possible. If we can assist in the process in any way, please let us know.

Respectfully,

Dianne Dowling,
on behalf of the Save Our Prison Farms committee and the Pen Farm Herd Co-op

"Incarceration alone does not produce the long-term changes that many offenders require to lead productive, law-abiding lives in the community. Correctional programs, in institutions and in the community, are essential to help bring about positive changes in behaviour."
<http://www.csc-scc.gc.ca/about-us/006-0009-eng.shtml>

From: Goodale, Ralph E. - M.P.
To: Public Safety MCI / Sécurité publique UCM (PS/SP)
Subject: Fwd: Canada's Prison Farms
Date: Wednesday, January 24, 2018 11:02:15 AM
Attachments: Prison Farms Jan2018.docx
Inmate's letter.pdf

DOC. GDL-016182
OPWBPR CSC
D.D./D.E. February 22, 2018
ACTION Reply
FILE ## DOSSIER 5350-1

From: Bridget Doherty <bridget.doherty@providence.ca>
Date: January 24, 2018 at 11:01:02 AM EST
To: Poilievre, Pierre - M.P. <pierre.poilievre@parl.gc.ca>, Trudeau, Justin - Député <justin.trudeau@parl.gc.ca>, Griffin, Diane :Sen <Diane.Griffin@sen.parl.gc.ca>, Hon.ralph.goodale@canada.ca <Hon.ralph.goodale@canada.ca>, Pate, Kim :Sen <Kim.Pate@sen.parl.gc.ca>, Easter, Wayne - M.P. <wayne.easter@parl.gc.ca>, Goodale, Ralph E. - M.P. <ralph.goodale@parl.gc.ca>, Bernard, Wanda Thomas :Sen <WandaThomas.Bernard@sen.parl.gc.ca>, Gerretsen, Mark - M.P. <Mark.Gerretsen@parl.gc.ca>, Dusseault, Pierre-Luc - Député <Pierre-Luc.Dusseault@parl.gc.ca>, Holland, Mark - M.P. <Mark.Holland@parl.gc.ca>
Cc: Villeneuve, Justine (PS/SP) <justine.villeneuve@canada.ca>
Subject: Canada's Prison Farms

January 24, 2017

Minister Goodale
Minister of Public Safety and Emergency Preparedness
House of Commons
Ottawa, Canada K1A 0A6

Dear Minister Goodale,

You invited us to sit on the Prison Farm panel with Correctional Service Canada (CSC) to explore rehabilitation programs for inmates including offenders struggling with mental health issues, Indigenous offenders and youth.

We thought you may be interested in knowing the potential outcome of our meetings.

In the spring, after several panel discussion, CSC submitted three proposals to you. Since then we have continued to meet, more recently with Indigenous elders, to explore rehabilitation and work skills within the farms.

As you are aware, these farms were closed in 2010. We like to draw your attention to a project called 'Work 2 Give' which started two years later, in 2012. This project is a federal prison-community partnership between the Tsilhqot'in First Nation in the Central Interior of

BC and the Correctional Service of Canada.

When we were made aware of this program we were perplexed how on one side of Canada the prison farms were closed and on the other side a program, which aims to be replicated across Canada, is precisely the program that was lost with the closure of the farms. See (start at 3.24min) <https://nursing.ubc.ca/events/2017/helping-men-inside>

Investing in the re-vitalization of the farms offers an opportunity to bring 'Work 2 Give' to eastern Canada which I believe CORCAN is currently aiming to achieve.

I have attached a letter from an inmate who is working at the abattoir. He wrote this letter on Monday. Without any prompting or information from us he so succinctly gives testimony to everything we have been saying since the closure of this valuable program.

We wait with great anticipation for the budget announcement and look forward to working with you as we bring the cows back to prison.

Best regards,
Bridget Doherty

On behalf of the Save Our Prison Farms campaign

Cc: Prime Minister Trudeau, MP Mark Holland, MP Mark Gerretsen, MP Wayne Easter, MP Pierre Poilievre, MP Pierre-Luc-Dusseault, Senator Kim Pate, Senator Wanda Thomas Bernard, Senator Diane Griffin, Justine Vileneuve



INQUIRY OF MINISTRY DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
 PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./N° DE LA QUESTION Q-1158 ²	BY / DE Mr. Allison (Niagara West)	DATE September 19, 2017
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Reply by the Minister of Public Safety and Emergency Preparedness
 Réponse du Ministre de la Sécurité publique et de la Protection civile

The Honourable Ralph Goodale, P.C., M.P.

PRINT NAME OF SIGNATORY
 INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
 MINISTER OR PARLIAMENTARY SECRETARY
 MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

With regard to official “advisory councils” or “advisory boards” set up by the government since November 5, 2015, and broken down by department, agency, crown corporation or other government entity: (a) what is the complete list of councils and boards; (b) who are the members of each council or board; (c) what are the details of each meeting, including (i) date, (ii) location, (iii) topic; (d) how much is each member financially compensated for their participation on a board or council, broken down by board or council and individual; (e) who is the chair of each board or council; (f) how much is each chair financially compensated for their participation in the board or council; and (g) which minister is responsible for selecting the members and chair of each board or council?

REPLY / RÉPONSE

ORIGINAL TEXT
 TEXTE ORIGINAL

TRANSLATION
 TRADUCTION

Public Safety Canada (PS)

PS did not set up any “advisory councils” or “advisory boards” since November 5, 2015.

Canada Border Services Agency (CBSA)

The CBSA did not set up any “advisory councils” or “advisory boards” since November 5, 2015.

Canadian Security Intelligence Service (CSIS)

CSIS did not set up any “advisory councils” or “advisory boards” since November 5, 2015.

Correctional Service of Canada (CSC)

The requested information is provided in Annex 1.

Parole Board of Canada (PBC)

The PBC did not set up any “advisory councils” or “advisory boards” since November 5, 2015.

Royal Canadian Mounted Police (RCMP)

The RCMP did not set up any “advisory councils” or “advisory boards” since November 5, 2015.

Q-1158

NAME OF ORGANIZATION: Correctional Service of Canada (CSC)

(a) what is the complete list of councils and boards	(b) who are the members of each council or board	(d) how much is each member financially compensated for their participation on a board or council	(e) who is the chair of each board or council	(f) how much is each chair financially compensated for their participation in the board or council	(g) which minister is responsible for selecting the members and chair of each board or council
Advisory Panel for the Reopening of Penitentiary Farms	Community members: Dianne Dowling; Jeff Peters; Tony Straathof; Bruce Vandenberg; Sharon Vandenberg; Catherine Latimer; Brigit Doherty; Alec Ross. Government employee members (CORCAN, Correctional Service of Canada): Kelly Hartle, Acting Chief Executive Officer; Craig Chinnery, Operations Manager; Terry Lister, Operations Manager; Chris Stein, Construction Manager	The community members are not compensated for their participation, although travel expenses are reimbursed in accordance with the National Joint Council Directive, as applicable. Government employee members receive their regular salary, and travel expenses are reimbursed in accordance with the National Joint Council, as applicable.	The Advisory Panel is co-chaired by Dianne Dowling, community member, and Kelly Hartle, Acting Chief Executive Officer, CORCAN, Correctional Service of Canada.	The co-chairs do not receive compensation for this role, although their travel expenses are reimbursed in accordance with the National Joint Council, as applicable. Kelly Hartle, as a government employee, receives her regular salary.	The Minister of Public Safety and Emergency Preparedness is responsible for selecting the community members of the Advisory Panel for the Reopening of Penitentiary Farms. These community panel members selected the community co-chair.

(c) what are the details of each meeting		
Council or Board name	(i) date	(ii) location
Advisory Panel for the Reopening of Penitentiary Farms	June 20 and 21, 2017	Kingston, Ontario
Advisory Panel for the Reopening of Penitentiary Farms	August 2, 2017	Kingston, Ontario
Advisory Panel for the Reopening of Penitentiary Farms	September 29, 2017	Kingston, Ontario
		(iii) topic
		Options related to the Collins Bay Institution and Joyceville Institution farms, including livestock, operations, and land utilization.
		Detailed discussions on land base and steps for implementation of farming operations including infrastructure and equipment needed, as well as environmental considerations.
		Options for business models for operations, identification of stakeholders and governmental regulatory requirements for farming operations to re-open.



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

CONFIDENTIAL

November 19, 2019

Sent by email to: info@calvinneufeld.com

Calvin Neufeld and Franceen Neufeld
Co-Founders, Evolve Our Prison Farms
57 Foster Street, Box 2012
Perth, Ontario K7H 1R9

Subject: Request for an examination into the conduct of the Honourable Ralph Goodale

Dear Calvin and Franceen Neufeld:

I am responding to your letter of May 2, 2019, in which you alleged that the Honourable Ralph Goodale, P.C., Minister of Public Safety and Emergency Preparedness, may have contravened section 7 of the *Conflict of Interest Act* (Act) with regard to the appointment of members of the Farm Advisory Panel, and requested that I commence an examination under the Act into the matter.

Your request follows up on an earlier request for an examination of the same matter, to which I responded on August 21, 2018. At that time, I wrote that the members of the Panel were not subject to the Act and that since Minister Goodale had not appointed the members of the Panel and therefore had not exercised an official power in that respect, section 7 did not apply.

In your letter of May 12, 2019, you claimed that my response to your earlier request was based on false or misleading information provided by Minister Goodale. Please note that any conclusions articulated in that response were not based on statements by the Minister but rather on information gathered from you and from public sources.

... / 2

PARLIAMENT OF CANADA

66 Slater Street, 22nd floor
Ottawa, Ontario K1A 0A6

PARLEMENT DU CANADA

66, rue Slater, 22^e étage
Ottawa (Ontario) K1A 0A6



ciec-ccie.parl.gc.ca



@CIEC_CCIE | @CCIE_CIEC

TEL/TÉL

613.995.0721

FAX/TÉLÉC

613.995.7308

In your recent correspondence, you asked me to reconsider the matter in light of new information and developments, as well as documents you obtained through access-to-information requests. In your view, these new elements show that Minister Goodale exercised preferential treatment in the selection and appointment of the members of the Farm Advisory Panel based on the selected individuals' association with the Save Our Prison Farms group and the Pen Farm Herd Co-operative.

The documents you obtained and forwarded to this Office indicate that in 2016, members of the Save Our Prison Farms group contacted Minister Goodale to suggest the creation of an advisory body to assist with the fulfilment of a plan to reopen the prison farms that were shut down by the previous government.

In a briefing note to Minister Goodale dated March 16, 2017, the then-Commissioner of the Correctional Service of Canada (CSC) Don Head sought and obtained approval to proceed with the establishment of a Farm Advisory Panel to provide non-binding advice to CSC. The note also submitted names and brief bios of proposed panel members, including those of Ms. Dianne Dowling and Mr. Jeff Peters, identified as members of the Save Our Prison Farms group as well as directors of the Pen Farm Herd Co-operative, and of Sister Bridget Doherty, also a supporter of Save Our Prison Farms. The Panel as it was announced on May 11, 2017, included a fourth member associated with the group.

In your view, the new information and developments in this matter support your allegation that Minister Goodale may have contravened section 7 of the Act in relation to the appointment of Panel members.

Section 7 reads as follows:

No public office holder shall, in the exercise of an official power, duty or function, give preferential treatment to any person or organization based on the identity of the person or organization that represents the first-mentioned person or organization.

Section 7 is very limited in its application. It only applies to cases where preferential treatment is based on the identity of the person or organization that represents the person or organization that receives preferential treatment.

Even though it now appears that Minister Goodale did approve the appointment of Farm Advisory Panel members, concerns of preferential treatment in contravention of section 7 would still require a connection between the Minister and one of the Panel members associated with Save Our Prison Farms or the Pen Farm Herd Co-operative. The only information you provided suggesting such a connection is found in comments you cited by Member of Parliament for Kingston and the Islands Mark Gerretsen on February 28, 2017, regarding telephone calls between the Minister and Ms. Dowling.

Given that no other information to that effect has come to my attention, I find the notion that any person's identity may have played a role in the matter to be too remote to give reason to believe a contravention of section 7 of the Act may have occurred. As a result, I will not be pursuing the matter further.

Since Minister Goodale was in receipt of your letter of May 2, 2019, I am providing him with a copy of this response.

Should you have any questions or require further clarification, please do not hesitate to contact Mr. Sylvain Gauthier, Investigations Officer, at 613-996-1358.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mario Dion', written in a cursive style.

Mario Dion
Conflict of Interest and Ethics Commissioner

c.c.: The Honourable Ralph Goodale, P.C.