

Communications Branch
Ministry of the Solicitor General
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The National Farmers Union – Ontario (NFU-O) is pleased to offer input as Ontario prepares to draft new animal welfare legislation. Our members are farmers across the province, many of whom own and work with agricultural animals. We are all concerned about the welfare of animals. We are pleased that the government has made it a priority to bring in new legislation in the wake of the January 2019 court ruling striking down the authority of the Ontario SPCA. We look forward to a new law filling the vacuum that currently exists. We sincerely hope that the new law will uphold public confidence in Ontario's animal welfare regime and bring comfort to concerned citizens who may fear that farm animals do not currently have adequate protection.

We note that it is widely recognized that animal welfare requires that they be provided with freedom from hunger and thirst; discomfort; pain, injury and disease; fear and distress; and with the freedom to express normal behaviour. Across Canada, the National Farm Animal Care Council's ***Codes of Practice for the care and handling of farm animals*** have been incorporated by reference into several provincial animal protection regulations. These *Codes of Practice* include both "required" and "recommended" practices. We would urge Ontario to mandate strict enforcement of "required" practices and mechanisms to promote a higher standard through compliance with "recommended" practices as well. See <https://www.nfacc.ca/codes-of-practice> for links to the codes of practice. Not only are high standards of welfare important in their own right, they are increasingly a positive factor in market differentiation.

We support having a publicly accountable animal protection regime that is adequately and publicly funded, which provides inspection and enforcement by properly trained personnel, including but not limited to municipal police. The NFU-O also urges the Attorney General to consider a model similar to that used by Manitoba, Saskatchewan, and/or Alberta which limit the authority of humane societies with regard to farm livestock and entering farm premises. Limitations on access to premises by Animal Protection Agencies and Animal Protection Officers are either in the statute itself or incorporated in the regulations, ensuring that these entities and individuals are publicly accountable.

While outside of the scope of the animal protection legislation, we would like to highlight the need for regulations and policies that support on-farm slaughter capacity as well as the viability of local and regional abattoirs to reduce the time and distances animals must spend in transportation. Food sovereignty and agroecology values are supported by a robust and well-integrated local and regional food system where farmers and customers work together for their common interests.

Respectfully submitted by

National Farmers Union – Ontario
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