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LONG-TERM THINKING FOR TODAY'S ISSUES

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November 29, 2019

Roman Baber, MPP

Chair, Standing Committee on Justice Policy

Room 1405 Whitney Block

Queen's Park

Toronto ON, M7A 1A2

Delivered to the Standing Committee on Justice Policy via email: [comm-justicepolicy@ola.org](mailto:comm-justicepolicy@ola.org)

Dear Mr. Roman Baber,

### **RE: Bill 136, An Act to enact the Provincial Animal Welfare Services Act, 2019**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

As stewards of creation, the CFFO is concerned for the importance of animal care on farms, for household pets, and more broadly for the welfare of animals in nature.

The CFFO wants to see a credible, transparent, and effective animal protection system across the province. The proposed Provincial Animal Welfare Services Act, 2019 is an important step in establishing a new system of animal welfare legislation in Ontario.

The CFFO supports the proposal for an animal welfare system that is publicly accountable and publicly funded. Furthermore, the requirement for appropriate training for all inspectors is key to keeping the system effective and fair. We have some further recommendations for your consideration.

#### **Recommendations:**

1. Remove "psychological" from the definition of "distress" in the Act.
2. Clarify that guardian dogs do not apply under Section 16 on Animal Fighting Prohibitions, either within the Act or within regulations.
3. Ensure that the regulations set reasonable fines in keeping with the offense for first-time offenders.

The proposed Act makes a significant distinction between penalties for individuals and penalties for corporations. It is important to consider that many family-owned farm operations, which may be owned by a single family or individual, are incorporated. This is done primarily to facilitate succession of the farm from one generation to the next. Family farms should not be subject to undue punishment for penalties as a result of being incorporated.

We appreciate this opportunity to comment on this proposed Provincial Animal Welfare Services Act, 2019 and thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clarence Nywening', with a long horizontal flourish extending to the right.

Clarence Nywening, President  
Christian Farmers Federation of Ontario  
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**CC:** Hon. Ernie Hardeman, MPP, Ministry of Agriculture, Food and Rural Affairs