



*Canadians for
Ethical Treatment of Food Animals*

Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environmental Policy Branch
1 Stone Road West, 2nd Floor
Guelph, ON N1G 4Y2

July 20, 2009

Dear Sirs and Mesdames:

Re: Proposed Animal Health Legislation for Ontario

Thank you for the opportunity to provide comments on the proposed animal health and traceability legislation for Ontario.

CETFA is greatly supportive of the proposal and pleased to see that collecting stations/assembly yards have been included as potential facilities for inspection by OMAFRA. As you know, our investigations have uncovered troubling practices at these facilities in Ontario, such as tusk trimming/tooth breaking and boar bashing.

Our inspectors have noted that collecting stations that have auction houses attached (unique to Ontario) are of a much higher standard than those without auctions attached. These facilities generally provide straw, feed and water for the pigs being assembled (also unique to Ontario). We've only come across this in one other collecting facility – Perlich Bros in Alberta). We've also noted far fewer badly injured, diseased or suffering pigs at these facilities – perhaps because of the OSPCA program that provided captive bolt pistols to all auction houses. This has made clear to us that routine inspections ensure better facilities, handling, body condition of animals accepted and overall use of best practices. The collecting stations without auction houses we've inspected in Ontario have many problems – primarily in handling and condition of the animals. We are certain that routine, ideally unannounced inspections of these facilities will bring these facilities up to par with the others.

We also appreciate the inclusion of making it an offence to impede an inspector's investigation and information-collection efforts, as we're intimately aware of how difficult management of some facilities can be.

While not directly noted in the regulations, we are hopeful that *welfare* concerns will be given the same consideration as health concerns (for example in the case of animals who arrive at collecting stations or auction houses in poor condition due to neglect or abuse) and that the new regulations and increased authority to inspectors would be applied to investigations and information-collection in these cases. This has unfortunately not been the case in Manitoba where such legislation specifically made clear that welfare improvements were not the intended purpose of the new traceability regulations and that no information would be shared in cases of neglect or abuse. We know OMAFRA is of a much higher standard, so suspect this will not be the case in Ontario.

Thank you once again and best wishes for the passage of this new legislation.

Sincerely,

Twyla Francois
Head of Investigation

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