

May 17, 2023

Re. ERO number 019-3685 - Proposal to allow the issuance of licences for new dog train and trial areas and the transfer of licences

To the Public Input Coordinator for the above-noted consultation:

Please allow me to express Humane Canada's complete opposition to this proposal to extend dog training and trialing using penned hunting facilities in Ontario, due to the severe animal welfare implications it entails. We find the proposal to be completely inhumane and unethical, and we sincerely hope that through considering the extensive feedback you will receive from other organisations and individuals across the province who are similarly opposed, this proposal will be retracted.

The activity of penned dog hunting runs counter to a number of Humane Canada's position statements:

- We are opposed to hunting using dogs due to the distress, injury and inhumane death caused to wildlife, in addition to the risk to dogs. Therefore, we do not support any activities to teach dog hunting skills or conduct trialing competitions.
- We are also opposed to holding wild animals in captivity, as they cannot be provided with adequate care.
- We are furthermore opposed to hunting in which the target animal is confined.
- Prevalent trapping practices to capture wildlife from their habitat are not humane and cause great risk to non-target animals and humans.

This inhumane, unethical activity is completely unacceptable in contemporary Canadian society, which is why steps were taken to phase it out more than a quarter of a century ago. This complete reversal of the past decision is illogical. Rather than re-igniting this activity, the Government of Ontario should be working toward ensuring existing facilities are finally phased out and eliminated, and other requirements are strengthened to make hunting practices more ethical.

We believe the assessment of environmental consequences included in the regulatory impact analysis cannot possibly be neutral, since an increase in trapping wildlife to supply animals to be hunted in proposed new facilities will disturb and harm those targeted species as well as

others who are incidentally affected, as well as the habitat and other species where traps are set. The proposal and continuing activity of penned hunting for dog training and trialing goes in the exact opposite direction of what is needed to responsibly consider the conservation of nature, particularly given the current compounding biodiversity and climate change crises. While there is an urgent need today to drastically curtail human impacts on wildlife, the activity and proposal heads precisely counter to the approach that is needed.

Humane Canada embraces the One Health/One Welfare perspective, which recognizes that the health and welfare of animals is inextricably linked to human health and wellbeing and environmental integrity. This perspective is increasingly being adopted and understood by those who seek to understand the complex inter-relationships of the social, health, and environmental policy issues being dealt with today, and to adopt more holistic, cross-disciplinary approaches to better address them.

Finally, allow me to take the opportunity to inform you about our project, [Measuring Progress Toward a Humane Canada](#), under which we have developed a list of indicators that will help to measure the status of diverse issues affecting wild animals, as well as companion animals, farmed animals, animals used in science, and, indeed, all animals. Our most recent report under this project, [Toward a Humane Justice System for Animals](#), measures indicators of Canada's legal framework for animals and whether there is accountability to the law when animals are harmed. The next report under this project will be released later this year and addresses a number of indicators related to wildlife issues. We urge you to review and consider our findings. You will find all the reports at humanecanada.ca/indicators. Please do not hesitate to contact me directly at toolika@humanecanada.ca should you have any questions.

Sincerely,



Toolika Rastogi
Senior Manager, Policy and Research



About Humane Canada

Humane Canada, previously known as the Canadian Federation of humane societies, is the national organization representing humane societies and SPCAs. As such, we represent the largest animal welfare community in Canada. We drive positive, progressive change to end animal cruelty, improve animal protection, and promote the humane treatment of all animals through the enactment of effective legislation. Our 53 member organizations (listed below) include societies in every province and two territories. Approximately 30% of these organizations act as enforcement authorities for provincial and federal legislation pertaining to animal cruelty and abuse. Many of these organizations were founded just after Canada's Confederation and are among the oldest and most trusted social institutions in the country.

Humane Canada Member Organizations

Alberta Animal Rescue Crew Society	Hamilton Burlington SPCA	Regina Cat Rescue
Alliston and District Humane Society	Happy Valley Goose Bay SPCA	Regina Humane Society
Animatch	Humane Society Dawson	Royal City Humane Society
Association of Animal Shelter Administrators of Ontario	Humane Society Kawartha Lakes	Saskatchewan SPCA
BC SPCA	Humane Society of Kitchener Waterloo & Stratford Perth	Saskatoon SPCA
Burin Peninsula SPCA	Humane Society London & Middelsex	Sault Ste. Marie & District SPCA
Burlington Humane Society	Lincoln County Humane Society	Société protectrice des animaux de Québec
Calgary Humane Society	Medicine Hat SPCA	SPA de l'Estrie
Canadian Association for Humane Trapping	Miramichi SPCA	SPA de l'Outaouais
Central Alberta Humane Society	Montreal SPCA	Spayaid PEI
Charlotte County SPCA	New Brunswick SPCA	SPCA Péninsule Acadienne
Cochrane & Area Humane Society	Newfoundland & Labrador SPCA (St. Johns SPCA)	Thunder Bay and District Humane Society
Edmonton Humane Society	Northwest Territories SPCA	Toronto Humane Society
Exploits Valley SPCA	Nova Scotia SPCA	Victoria Humane Society
Fredericton SPCA	Oakville & Milton Humane Society	Windsor Essex County Humane Society
Gander & Area SPCA	Ontario SPCA	Winnipeg Humane Society
Georgian Triangle Humane Society	Oromocto & Area SPCA	Wood Buffalo Humane Society (Fort McMurray SPCA)
Guelph Humane Society	Ottawa Humane Society	
	Prince Edward Island Humane Society	



THE FEDERATION OF SPCAs AND HUMANE SOCIETIES
FÉDÉRATION DES SOCIÉTÉS D'ASSISTANCE AUX ANIMAUX