

Hon. David Piccini
Minister of the Environment, Conservation, and Parks

May 17th, 2023

Dear Minister Piccini,

The Ontario SPCA and Humane Society opposes the use of animals in activities, contests, or events that have a high probability of causing death, injury, distress, or illness as these activities do not enable the animal's ability to achieve the Five Freedoms.

The proposed regulation, to allow for the transfer of existing train and trial licenses and a 90-day window to purchase new licenses, is highly problematic.

The Ontario SPCA has specific concerns with both the overall purpose of existing licenses and the specific animal welfare implications these regulations might allow, including:

- activities carried out in licensed facilities by their nature provided the opportunity for "canned hunts" of wildlife under the guise of a trial and train license;
- keeping wild animals in an enclosed area, for the purpose of being prey in competitions and "canned hunts" crosses a line from genuine hunting practices to a form of entertainment that results in the significant increase risks of injury or death of animals due to their confinement. This is unacceptable and should not be allowed, much less expanded;
- that a 90-day licensing window will eventually be extended or replaced with a permanent availability for new licenses.

For these reasons, the Ontario SPCA opposes the continued operation of these facilities, the ability to transfer licenses, and the issuance of new licenses by the province due to the significant animal welfare implications.

Sincerely,



Drew Woodley
Director of Government Relations
Ontario SPCA and Humane Society