



Ontario Federation of Agriculture

Ontario AgriCentre

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August 26th, 2016

Mr. Hyla Zeifman,
Strategic Engagements
Alcohol and Gaming Commission of Ontario
90 Sheppard Avenue East, Suite 200
Toronto, ON
M2N 0A4

Dear Mr. Zeifman,

Re: Proposal # 16-MAG008 under the Horse Racing Licence Act, 2015

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA appreciates the opportunity to provide comments to the Alcohol and gaming commission on Ontario (AGCO) on the future of Ontario horse racing, a vital industry creating jobs and supporting local businesses in rural communities.

OFA would like to take this opportunity to support the Horsemen's Benevolent and Protective Association (HBPA) of Ontario on three issues that will reduce the burden that current regulations have on the Ontario horseracing industry while enhancing equine welfare.

Process of investigating Positive test results

Under the current process of racehorse drug testing, any positive tests are made public before any follow up investigation is conducted. Publically announcing a positive test has serious repercussions and causes owners to drop trainers.

This process needs to be amended to allow for a more thorough investigation into the positive test, to determine the circumstances of the positive test and whether it's deemed an accident or intentional. There should be a distinction between those trying to game the system and honest trainers that made a simple mistake. Positive tests should be made public after the investigation is complete and full details of the investigation should be provided for context.

Requirement for Licencing of Horse Organizations

Ontario is one of the only jurisdictions in North America that requires horseracing associations to be licensed. An association representing the horseracing industry should never be put in a position to potentially have that licence taken away based off the actions of a member or director. Trainers need to be licensed but associations should not be required to do so.

Bio Security

Ensuring the bio security at horserace track is critical to horse health as this is where infected horses are most likely to co-mingle with healthy horses and spread infectious diseases. Adequate funding needs to be made available to develop and implement a uniform bio security protocol at all Ontario racetracks.

AGCO must work closely with industry including associations, veterinarians, trainers and owners when considering future changes to horseracing regulation to ensure these policies fulfill their intended purposes and are workable for the industry.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Don McCabe". The signature is fluid and cursive, with a prominent initial "D" and a trailing flourish.

Don McCabe
President