



Ontario Federation of Agriculture

Ontario AgriCentre

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November 8, 2017

Ministry of Health and Long-Term Care
777 Bay Street, 19th Floor
Suite 1903
Toronto, ON M7A 1S5

To Whom It May Concern:

RE: Regulatory Registry Proposal 17-HLTC042 – Proposed Amendments to Regulations made under the Health Protection and Promotion Act

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA objects to the extremely short comment period for this proposed regulatory amendment. A 14-day comment period is not sufficient to allow for a proper investigation and assessment of the proposed amendments.

We strongly recommend that the proposed amendments to O. Reg. 567, Rabies Immunization, be set aside and that consultations with Ontario's livestock commodity organizations and Ontario's Chief Veterinarian occur before any such regulatory amendment is made.

OFA agrees with the stated objective to "modernize requirements for rabies immunization of animals". However, inviting public health units who are currently not subject to the requirement to have certain livestock in specific health unit jurisdictions immunized against rabies to be added to Tables 1 and/or 2 of the regulation appears not to be consistent with a risk-based approach. In fact, we recommend a risk-based approach be taken to determine if the certain livestock in the specific health unit jurisdictions currently listed should remain listed.

Sincerely,

Keith Currie
President

cc: Hon. Jeff Leal, Minister of Agriculture, Food and Rural Affairs
Hon. Eric Hoskins, Minister of Health and Long-Term Care
Hon. Kathryn McGarry, Minister of Natural Resources and Forestry
Beef Farmers of Ontario
Dairy Farmers of Ontario
Ontario Sheep Marketing Agency
OFA Board of Directors