May 2, 2018

Hon. Dr. Helena Jaczek
Minister of Health and Long-Term Care
Minister's Office
Hepburn Block,10th Floor
80 Grosvenor Street
Toronto, ON   M7A 2C4

Dear Minister,

RE: Regulatory Amendments to O. Reg. 567, Rabies Immunization, 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 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 is extremely disappointed that the Ministry of Health and Long-Term Care disregarded the advice OFA provided in its November 8, 2017 letter submitted during the 14-day comment period on proposed regulatory changes to O. Reg 567 made under the *Health Protection and Promotion Act.* Even though OFA strongly recommended that the proposed amendments to O. Reg 567 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, the Ministry of Health and Long-Term Care proceeded to make amendments to this regulation as filed on December 15, 2017.

On July 1, 2018, this regulation will require that all livestock "for which a rabies vaccine licenced for use in Canada is available" shall be immunized against rabies with the exception being made only for livestock "that is accessible only to the person or persons who are responsible for the care and control of such animal".

Many in the farm community are greatly concerned with these requirements and how they might be interpreted and enforced. It is very unfortunate that the Ministry did not appreciate the need to consult and understand the needs of the farm community before amending this regulation. We believe that if a targeted, risk-based approach had been taken, then a much better worded regulation could have been drafted.

It is currently unclear as worded in this regulation as to who is considered to be a person "responsible for the care and control" of livestock and what measures need to be taken to make livestock inaccessible to any other person or persons. It is therefore difficult to determine when a rabies vaccine is required to be administered to livestock.

According to *Recommendations to Prevent Disease and Injury Associated with Petting Zoos in Ontario* released by the Ministry of Health and Long-Term Care, rabies vaccines must be administered to "unvaccinated mammals and mammals not up-to date on their rabies vaccination at least 1 month prior to contact with the public because of the extended incubation period for rabies". Education and awareness regarding the amended regulation from the Ministry is not planned until after the upcoming June 7th election, leaving some livestock owners unaware that their animals require the rabies vaccine effective July 1, 2018. This would not allow for the recommended 30-day period after rabies immunization for the vaccine to be effective, potentially placing livestock owners in legal non-compliance with this regulation.

After consultations between OFA and the Ministry of Health and Long-Term Care, these concerns and many additional questions, remain unanswered. On behalf of our affected farming members concerned with the rabies immunization requirement, OFA strongly recommends that the effective date of July 1, 2018 be delayed allowing for further time to address the challenges with the December 2017 amendments to this regulation.

We would be pleased to provide further clarification of our perspective, should you require it. We look forward to your response to our request.

Sincerely,

Keith Currie
President

cc: Hon. Jeff Leal, Minister of Agriculture, Food and Rural Affairs
Dr. Bob Bell, Deputy Minister, Ministry of Health and Long-Term Care
OFA Board of Directors