

December 7, 2018

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

To Whom it May Concern:

RE: Proposed Amendments to Ontario Regulation 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 38,000 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 supports the proposed regulatory amendments to Ontario Regulation 567, Rabies Immunization, under the *Health Protection and Promotion Act*, intended to clarify when a rabies vaccine is required and in which species.

Simplifying the wording to limit rabies vaccination only to horses, cows, bulls, steers, calves and sheep will help eliminate any uncertainty as to which animals require a rabies vaccine in Ontario. Exempting the stated species from rabies immunization requirements when they are at a seasonal fall fair, unless intended for public interaction, will help ease the burden associated with cost and labour of rabies vaccination on livestock owners and handlers. OFA believes the proposed regulatory amendments will help to reduce unnecessary red tape and expenses for livestock owners and handlers associated with rabies vaccination, while ensuring a consistent provincial approach to rabies immunization in animals.

OFA is concerned that the proposed regulatory amendments still do not address the timeliness of rabies vaccination in animals prior to public interaction. According to *Recommendations to Prevent Disease and Injury Associated with Petting Zoos in Ontario*, released by the Ministry of Health and Long-Term Care, animals must be vaccinated against rabies "at least one month prior to contact with the public" to be considered fully immunized. It is not clearly stated in the regulations to refer to the *Recommendations* for vaccination schedule, therefore livestock owners would be unaware that 30 days prior to general public interaction is needed to be considered

adequately immunized. OFA recommends that the regulations reference *Recommendations to Prevent Disease and Injury Associated with Petting Zoos in Ontario* for vaccination schedule, or clearly state that a minimum of 30 days is needed between rabies vaccination and public interaction for animals to be considered fully immunized.

In addition, vaccine withdrawal periods have not been addressed in the proposed amendments. With the potential increase in number of animals requiring rabies vaccination, monitoring and enforcement of vaccine withdrawal times prior to slaughter is crucial to ensure food safety. While withdrawal periods prior to slaughter are listed on the vaccine packaging, OFA recommends that inspection of animal veterinary records at abattoirs is increased, to ensure appropriate withdrawal times are being obeyed.

OFA takes this opportunity to recommend the Ministry further increase information and education activities related to rabies vaccination, to ensure consistency in awareness across the agricultural sector.

On behalf of our more than 38,000 farm family businesses across Ontario, OFA appreciates the opportunity to comment on the proposed amendments to Ontario Regulation 567, Rabies Immunization, under the *Health Protection and Promotion Act*.

Sincerely,



Keith Currie
President

- cc: Hon. Christine Elliott, Minister of Health and Long-Term Care
Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
Beef Farmers of Ontario
Dairy Farmers of Ontario
Ontario Equestrian
Ontario Sheep Farmers
OFA Board of Directors