

March 7, 2022

Ministry of the Solicitor General
George Drew Building
25 Grosvenor St, 9th Floor
Toronto, M7A 1Y6

Sent via email to: animalwelfareconsultation@ontario.ca

To Whom It May Concern,

Re: EBR 21-SOLGEN027: Updates to Standards of Care for Outdoor Dogs under the Provincial Animal Welfare Services Act, 2019

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates this opportunity to comment on EBR 21-SOLGEN027: Updates to Standards of Care for Outdoor Dogs under the Provincial Animal Welfare Services Act, 2019. OFA firmly believes in and advocates for the humane treatment of all animals, including farmed livestock and poultry.

OFA supports the proposed definition of a “dog kept outdoors” as it applies to livestock guardian dogs (LGDs). The current definition in O. Reg. 44/19 of “dogs that live outdoors” is vague and subject to interpretation. The proposed definition is distinct and clear on what constitutes an “outdoor dog” and how the new regulatory standards would apply to LGDs.

OFA is pleased to see outdoor doghouse exemptions for LGDs in the proposed standards of care for dogs kept outdoors. It is critical to understand that the role of LGDs is different from dogs “kept outdoors” or used for companionship, and therefore their standards of care and husbandry practices differ. Livestock guardian dogs are common place on some types of livestock farms and are purpose-bred to protect the animals from predators. As working dogs, LGDs spend their days and nights keeping watch over and protecting their animals, living with their stock 24 hours a day, seven days a week. As LGDs always stay with their stock, the requirement for outdoor structures is different, and they are able to utilize the same structures as the animals if need be.

OFA supports the other proposed updates to the standards of care for outdoor dogs as it applies to LGDs, including containment, food and water, grooming and nail care, and health and welfare management.



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OFA appreciates this opportunity to provide an agricultural-based perspective on EBR 21-SOLGEN027: Updates to Standards of Care for Outdoor Dogs under the Provincial Animal Welfare Services Act, 2019. We look forward to working together as the additional regulations take shape.

Sincerely,

A handwritten signature in black ink, reading 'Peggy Brekveld', is positioned above the printed name.

Peggy Brekveld
President

cc: John Hemsted, Chair, Ontario Sheep Farmers
OFA Board of Directors