

MNRF Fish and Wildlife Policy Branch – Wildlife Section
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The Canadian Veterinary Medical Association (CVMA) is the national voice of 25,000 veterinarians and veterinary technicians in Canada. The CVMA joins our colleagues from the Ontario Veterinary Medical Association (OVMA) in calling for reconsideration of the recent proposal to the proposed changes to the [Fish and Wildlife Conservation Act, 1997 \(Schedule 14\)](#) proposed as part of the larger *Less Red Tape, Better Economy Act*.

The proposed changes as described would result in increasing numbers of captured and relocated wildlife being subjected to significant suffering and would pose a risk of injury and potential disease transmission including zoonotic diseases such as rabies to the dogs involved as the prey animals attempt to defend themselves. This proposal runs counter to a previous Ontario Conservative government decision to slowly close these facilities via attrition.

The CVMA holds that the hunting of captured, relocated and penned prey animals by dogs for any purpose is inhumane. As it would often involve dog to dog-like species interactions, it is not dissimilar from organized dog fighting which been illegal in Canada since 1892 ([see Criminal Code of Canada section 445.1 \(1\)\(b\)](#)). As well, this type of planned predator-prey interaction would be considered a level E category procedure “above the tolerance threshold” by the Canadian Council on Animal Care and as such, would not be proposed or approved by any Canadian institution as part of the commitment to social license and evolving societal expectations. Lastly, the Canadian Association of Zoos and Aquaria, despite the potential for hedonic reward in predators permitted to hunt live prey, does not permit the provision of live prey to resident animals, as part of the ethical standards of practice.

The welfare of animals is increasingly important to the majority of Canadians, and this includes wildlife under the authority and care of the various levels of government. The CVMA calls on the Government of Ontario to carefully consider the submission made by the OVMA and this letter of support that request the province discard the proposed changes and adhere to the previous plan to continue to work toward closing these facilities.

If you would like more information, please feel free to contact the CVMA CEO Mr. Joel Neuheimer at [jneheimer@cvma-acmv.org](mailto:jneuheimer@cvma-acmv.org). We are able to connect with the appropriate subject matter experts to provide additional evidence-based information.



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