



January 9, 2025

Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA)
1 Stone Road West
Guelph, ON N1G4Y2

To Whom It May Concern,

Re: *Proposed Amendments to the Animals for Research Act (ARA) - 25-OMAFRA008*

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on regulatory proposal **#25-OMAFRA008** to amend the *Animals for Research Act* and Prospective Amendments to Regulations under the Act. BFO represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

We recognize and support the government's objective of ensuring the ethical and humane treatment of animals used in research, and we share a strong commitment to animal welfare across all livestock sectors.

We support the Ministry's proposed exceptions for veterinary and educational purposes, which are critical to ensuring the continuation of life-saving research, veterinary training programs, and strong animal-care oversight.

Veterinary education and research are essential to improving animal welfare, public health, and maintaining a skilled veterinary and veterinary-technician workforce in Ontario. Without these programs, Ontario risks shortages that could directly impact livestock health, emergency response capacity, on-farm animal care, food safety, and disease preparedness.

At the same time, BFO wishes to express serious concern on behalf of Ontario's cattle sector and the broader livestock industry regarding the potential precedent these changes may set for agricultural and livestock research in the province.

Livestock research is essential to improving animal health and welfare, advancing disease prevention and treatment, enhancing food safety, improving environmental sustainability, and strengthening productivity and competitiveness across Ontario's agri-food sector. Much of this research necessarily involves invasive or interventional procedures conducted under strict ethical review, veterinary oversight, and established animal care protocols. These activities are foundational to continuous improvement in livestock care and production systems.

While the current proposal is framed largely in response to public concern surrounding the use of cats and dogs in research, the broad scope of the ARA and the proposed new regulation-making authorities raise concerns that future regulatory changes could unintentionally restrict or complicate livestock research. In particular, the absence of clear statutory guardrails distinguishing companion animal research from agricultural research creates uncertainty for institutions conducting research involving cattle and other food-producing animals.

BFO is especially concerned that:

- Future definitions of “invasive medical research” or associated conditions could inadvertently capture routine, necessary livestock research activities.
- Expanded oversight and enforcement mechanisms, if not carefully tailored, could create duplicative or conflicting requirements with existing, well-established livestock research governance frameworks.
- Restrictions developed in response to public perception rather than scientific risk could discourage investment in Ontario-based livestock research and innovation.

It is important to note that livestock research facilities already operate under rigorous animal care committee review processes, science-based protocols, and professional veterinary standards. These systems have proven effective in balancing animal welfare with the need to conduct meaningful, responsible research that ultimately benefits animals, producers, and the public.

BFO strongly encourages OMAFA to:

- Clearly distinguish agricultural and livestock research from companion animal research in both legislation and future regulations.
- Ensure that any new requirements are proportionate, risk-based, and informed by scientific expertise and sector-specific realities.
- Engage directly with livestock organizations, researchers, and veterinary experts during the development of any future regulations to avoid unintended consequences.

Ontario’s beef sector is committed to continuous improvement in animal welfare, and research is a critical tool in achieving that goal. Regulatory changes should strengthen, not undermine, Ontario’s capacity to conduct responsible livestock research that delivers real-world benefits to animals and our economy.

We appreciate the opportunity to provide input and would welcome further engagement as this process moves forward.

Sincerely,



Craig McLaughlin
BFO President

Cc: BFO Board of Directors