October 16, 2026

Ministry of the Solicitor General
25 Grosvenor Street
Toronto, ON M7A 1Y6

Sent via the Ontario Regulatory Registry

RE: Record Keeping Related to Prohibited Procedures under the Provincial Animal Welfare Services Act, 2019 - 26-SOLGEN019

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on 26-SOLGEN019 *Record Keeping Related to Prohibited Procedures under the Provincial Animal Welfare Services Act, 2019*. 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.

This proposal states that the current record-keeping requirements prescribed under the PAWS Act are limited to dogs, with a proposal to expand these requirements to include cats and other animals. BFO seeks clarification on the intended scope of "other animals" and requests that the proposal clearly define which species or categories of animals would be captured by this provision, and if agricultural and livestock animals is also included.

BFO recommends that any record-keeping requirements related to prohibited procedures clearly distinguish between prohibited procedures and routine agricultural animal care, management and husbandry practices. Normal farm practices should not be subject to additional record-keeping requirements. This should include, as applicable, routine animal identification and handling, preventative health care, vaccination, parasite control, hoof and foot care, breeding and reproductive management, neonatal care, transportation and movement of livestock, routine treatment of minor injuries or illness, euthanasia and mortality management, and other routine husbandry practices undertaken in accordance with applicable legislation and accepted industry standards.

BFO supports the objective of protecting animal welfare and ensuring appropriate oversight of prohibited procedures. However, any new record-keeping requirements should be clear, proportionate, and limited to their intended purpose. BFO recommends clearly defining the scope of "other animals" and ensuring that normal agricultural practices are not subject to unnecessary or duplicative record-keeping requirements.

BFO continues to call for a targeted review of the PAWS Act, specifically as it relates to agriculture and commercial livestock operations, to assess its on-farm impacts, unintended consequences, and alignment with Ontario's existing animal care, transport, health, and welfare frameworks. For more than five years, BFO has repeatedly raised serious concerns with government regarding aspects of the Act and its application to livestock operations, with little meaningful progress toward addressing them. BFO is not seeking a wholesale review or reopening of the Act, but rather a distinct legislative or regulatory approach for commercial livestock, drawing on models used in other jurisdictions such as Manitoba. This would ensure that livestock agriculture is appropriately distinguished from companion animal care and that enforcement reflects the unique circumstances, established practices, and existing oversight of the sector. BFO urges the government to address these longstanding concerns through targeted changes that provide for consistent, reasonable, and proportionate enforcement while recognizing accepted livestock management practices and established standards of care.

BFO welcomes continued dialogue with the Ministry of the Solicitor General to address these concerns and work towards a framework that ensures the PAWS Act is applied fairly and proportionately with appropriate distinctions for commercial livestock and the realities of on-farm animal care.

Sincerely,



Jason Leblond
President