



December 10, 2018

Ontario 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) made under the Health Protection and Promotion Act – Proposal # 18-HLTC026*

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Beef Farmers of Ontario (BFO) would like to thank the Ontario Ministry of Health and Long-Term Care (MOHLTC) for the opportunity to comment on the proposed amendments to Ontario Regulation 567 of the *Health Protection and Promotion Act*. BFO represents 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, animal health and welfare, and domestic and export market development.

BFO is supportive of the Ontario government's proposed amendments to Ontario Regulation 567. Agricultural fairs are an important element in the cultural fabric of rural communities. A focal part of many of these fairs includes various live animal exhibits and competitions, which provide the public a valuable opportunity to learn about livestock production and interact with farm animals. Additional regulatory requirements, such as mandatory rabies immunization, would create unnecessary costs given the low level of risk involved when members of the public interact with livestock animals at fairs. As such, BFO is pleased by the proposed amendments being put forward for comment by the Ontario government.

BFO also wishes to submit comments in response to the MOHLTC's frequently asked questions document (see Appendix 1), which provides guidance information to stakeholders regarding Ontario's rabies immunization requirements for animals. While BFO believes this document provides good information that animal owners, public health officials, and members of the public can use to better understand rabies prevention and control measures, we believe some additions and/or revisions should be made, specifically in reference to Question 2 - *What is meant by "persons responsible for the care or control" of horses, cattle or sheep?*

The guidance document states that *"persons responsible for the care or control of an animal is a broad category which would include any individuals involved in looking after the daily or health needs of an animal and/or individuals responsible for handling, showing, or commercially transporting an animal. Examples of individuals who would fit into this category include:"*



BFO recommends that the last sentence be amended.

Current Wording:

Examples of individuals who would fit into this category include

Recommended Wording:

Individuals who would fit into this category may include but are not limited to

Rationale:

By the MOHLTC's own definition, persons responsible for the care or control of an animal is a broad category. However, the current language used to describe the types of individuals who may fall into this category implies that the provided examples represent an exhaustive list. BFO believes that incorporating the recommended wording will eliminate the potential misunderstanding.

The second item we wish to raise in regard to Question 2 is our recommendation that the following groups of individuals be included in the examples of individuals listed who would fit into the category of persons responsible for the care or control of an animal:

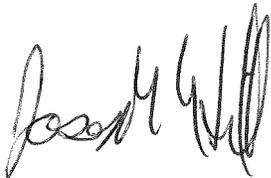
*Students in agriculture, veterinary medicine, or other related study fields required to work with animals as part of a course requirement or teaching obligation*

Rationale:

Students who come into direct contact with animals as part of their studies in agriculture, vet medicine, or other related fields are not captured by the current list. Adding this group to the list would cover off a large stakeholder group that may be affected by rabies prevention and control measures.

BFO would like to thank MOHLTC for the opportunity to comment on the proposed amendments. We would be happy to discuss our comments with you in further detail at your convenience.

Sincerely,



Joe Hill  
President

cc: BFO Board of Directors  
Ontario Sheep Farmers  
Ontario Federation of Agriculture

