



September 12, 2023

The Honourable Michael Kerzner, Solicitor General  
Ministry of the Solicitor General  
George Drew Building  
25 Grosvenor Street, 18<sup>th</sup> Floor  
Toronto, ON M7A 1Y6  
Email: [michael.kerzner@ontario.ca](mailto:michael.kerzner@ontario.ca)

**Subject:** Ontario Pork's Response to Inspector Training and Powers under the Provincial Animal Welfare Services Act, 2019 - Roundtable Discussion

Dear Minister Kerzner,

Ontario Pork welcomes the opportunity to participate in the continued consultations regarding the Provincial Animal Welfare Services Act, 2019 and regulations. We also appreciated the opportunity to participate in the roundtable hosted by Parliamentary Assistant Hogarth this morning, to discuss inspector training and powers.

Ontario Pork is the voice of the province's 997 pork farmers, and a leader in the agriculture industry. Led by producers, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork sector represents a significant part of the Canadian economy, combining - from "farm to fork" - \$1.35 billion in GDP, over 19,906 full-time jobs and \$3.78 billion in economic output.

Ontario's pork farmers are committed to internationally recognized high standards of animal care and farm practices, based on science, education, and animal husbandry best practices, with the industry investing heavily in research and innovation to improve animal care, food quality and safety. We firmly believe that treating animals cruelly, or inflicting unnecessary pain or suffering, is not acceptable to farmers or the public.

## **INSPECTOR POWERS AND KNOWLEDGE/TRAINING**

### **Swine specific training:**

Ontario Pork believes that inspector training enhancements are required for inspectors to obtain a better understanding of normal farm practices and to properly assess the handling, condition, and care of farm animals. Swine farm best practices, husbandry, housing and processing are all important for inspectors to understand.

We also believe that working with livestock commodity groups to focus on training and

specialization i.e., pigs, would be tremendously beneficial for the inspector, producer, and commodity group in effectively managing a situation/complaint. **Ontario Pork would welcome further discussions with the Ministry on inspector training regarding swine.**

**Mental health training and resources:**

Usually, significant animal care cases on commercial farms are a result of either mental health and/or significant financial issues (or both). Ontario Pork believes that Animal Welfare Services (AWS) needs to work with livestock commodity groups to support good outcomes for the animals, producers, and the industry as a whole.

**Ontario Pork recommends that inspectors receive training in the utilization of mental health services in animal welfare cases to ensure that inspectors are both knowledgeable and equipped to deal with a producer who may be experiencing mental health challenges.**

We acknowledge that inspectors may be limited in what kind of support they can provide to a producer, however, there are agriculture specific mental health services that inspectors should be aware of, including the Farmer Wellness Initiative. This service is accessible 24 hours a day, 7 days a week, 365 days a year, in English and French. Farmers needing immediate support can call 1-866-267-6255 to speak to a counsellor.

**Inspections and enforcement:**

Ontario Pork believes that a livestock commodity organization representative and a livestock specific commodity veterinarian should always accompany an inspector when a farm visit is required. We also continue to stress the importance of consultation with the respective livestock commodity group i.e., on a pork farm, contact Ontario Pork, prior to an inspector making a determination regarding an animal.

**Ontario Pork recommends the following:**

**Animal Welfare Specialists (AWS)**

- Should notify Ontario Pork in all cases where an inspection is to be undertaken on a swine farm, and when possible, an Ontario Pork representative should be invited to attend during that inspection.
- Should notify and invite Ontario Pork to attend when an inspector revisits the farm.
- Should notify Ontario Pork when an order is issued with respect to a pork farm.
- Should notify Ontario Pork of all incidents where animal seizure or removal is being considered or planned for commercial operations.

**Veterinarian inclusion**

- When AWS employs a veterinarian to accompany an inspector and to advise on pigs and other livestock welfare, the veterinarian should be an actively practicing, large animal commodity-specific veterinarian.
- Livestock must be distinguished separately from companion animals when it comes down to internal processes and decision-making. Livestock require different standards of care when compared to companion animals, including housing.

Given the large number of inspectors, consistency with how the PAWS Act and regulations are interpreted and enforced, must be consistent.

#### **THE ANIMAL SEIZURE/REMOVAL PROCESS**

The process to keep animals on site or remove is unclear and seems to depend on an inspector's ability to assess the situation and find a suitable home for the animals. This becomes particularly important when animals are seized and removed in the event of welfare distress.

For example, a pork producer had some of their pigs sent to a "sanctuary" at a large unnegotiated cost. The facility did not know how to care for the animals and the inspector advised feeding the pigs like a dog – two cups of feed in the morning and again at night. This is dangerous to the animal's health and well-being.

**Ontario Pork requests changes to the PAWS Act to better align with industry standards, and we welcome the opportunity to work with the province in improving the seizure, removal, and rehoming of animals.**

#### **BIOSECURITY REQUIREMENTS**

We continue to be concerned regarding farm biosecurity and compliance by those entering the premises. **Ontario Pork recommends that regulations clearly address adherence with a farm's biosecurity protocols to minimize the risk of disease spread, and that there is no entry unless a farmer is present.**

On behalf of Ontario's pork producers, thank you again for the opportunity to participate in this important consultation. Ontario Pork would welcome further discussion with the Ministry on the issues and recommendations raised in our response.

Sincerely,



John de Bruyn  
Board Chair

cc: Christine Hogarth, Parliamentary Assistant to the Solicitor General  
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs