

May 8, 2023

DELIVERED VIA EMAIL: wildlifepolicy@ontario.ca

Re: Proposal to Allow the Issuance of Licences for New Dog Train and Trial Areas and the Transfer of Licences
ERO Number 019-3685

Please accept this submission of AEL Advocacy in response to ERO Number 019-3685.

A. About AEL Advocacy

Animal Environmental Legal Advocacy (“AEL Advocacy”) is a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

B. Comments on the Proposal to Allow the Issuance of Licences for New Dog Train and Trial Areas and the Transfer of Licences

AEL Advocacy is strongly opposed to the Ministry of Natural Resources and Forestry (the “Ministry”) proposal to allow the issuance and transfer of licenses to keep wildlife captive for the purposes of training dogs for hunting and conducting hunting dog competitions (“Train and Trial Areas”).

Train and Trial Areas were established in 1997 with the intention of being phased out over time. AEL Advocacy urges the Ministry to withdraw this proposal and proceed with the initial plan to phase out Train and Trial Areas. We believe this practice should be phased out due to the negative impacts it has on wildlife and their habitats, the disruption of migration and hibernation patterns, the transmission of diseases and parasites, and the inhumane and unethical nature of the hunting practice.

I. Train and Trials Have Negative Impacts on Wildlife and their Habitats

As advocates for animal and environmental protection, AEL Advocacy is deeply concerned about the negative impacts of Train and Trial Areas on wildlife and their habitats.

Train and Trial Areas are often situated in important habitats that animals use for migration and hibernation, such as wetlands, forests, and grasslands. Hunting activities can block the natural movement of wildlife, which can lead to disrupted migration and hibernation patterns, impacting the survival and reproductive success of species that rely on these patterns. Hunting dogs used in these areas can also impact the behaviour and movement patterns of wildlife, further disrupting their natural patterns. The animals that are killed in Train and Trial Areas may be relied upon by other animals for survival, and the disruption of their populations can have a cascading effect on the ecosystem.

II. Transmission of Diseases and Parasites

Another concern is the potential human and animal health risks associated with Train and Trial Areas. As you may be aware, wildlife agencies across the United States have raised serious concerns about the increased incidence of various diseases and parasites between captive and wild animals within enclosures.¹ This poses a significant threat to both the health of the wild animal population and to humans.²

According to the Indiana Department of Natural Resources, for example, diseases such as raccoon strain rabies and coyote-variant canine rabies have been transferred due to the capture and transport of animals for hunting and training purposes.³ In addition, other diseases such as canine distemper, heartworm, and parvovirus enteritis, along with various parasites, can also be carried by captive animals such as coyotes and foxes.⁴

III. Inhumane and Unethical Hunting Practice

AEL Advocacy submits that Train and Trial Areas are inherently cruel and unethical. The capturing, transporting, marketing, and confinement of wild animals for the purpose of training domestic canines is inhumane and deprives these animals of their natural ability to flee from predators, often leading to a prolonged and painful death.⁵ Confined animals are also

¹ <http://www.projectcoyote.org/newsreleases/IN%20Penning%20Sign-on%20letter%20May%202011.pdf>

² http://www.projectcoyote.org/action/INDNR_Coyote_Fox_Petition_Response_Report.pdf

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.*

accustomed to being fed by humans, which can reduce their natural instincts and make them easier targets for hunters. Furthermore, animals used in Train and Trial Areas are subjected to prolonged and unavoidable pursuit, leading to chronic physiological stress and death.⁶

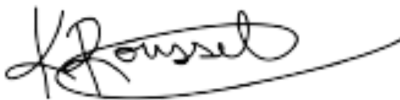
In describing the rationale for this proposal, the ERO posting states that: “Over time, the ministry has received requests for changes to allow dog train and trial areas to continue to persist, including allowing for licence transfers in response to aging licence holders, as well as new licences to be issued.”⁷ AEL Advocacy submits that catering to the requests of hunters in this manner would disregard the welfare of wild animals and perpetuate a cruel and unethical practice.

C. Conclusion

AEL Advocacy is firmly opposed to the Ministry of Natural Resources and Forestry’s proposal to allow new licenses and the transfer of licenses for Train and Trial Areas in Ontario. **We urge the Ministry to withdraw these proposed amendments to the *Fish and Wildlife Conservation Act, 1997*, and proceed with the initial plan to phase out these environmentally damaging and unethical Train and Trial Areas.**

We welcome the opportunity to discuss the above comments and recommendations.

Sincerely,



Krystal-Anne Roussel
Co-Director and Counsel



Emma Peckham
Communications Manager

⁶ <http://www.projectcovote.org/newsreleases/IN%20Penning%20Sign-on%20letter%20May%202011.pdf>

⁷ <https://ero.ontario.ca/notice/019-3685>