



**Written Submission for the Pre-Budget Consultations in
Advance of the 2025 Federal Budget**

**By: Animal Environmental Legal Advocacy
July 23, 2024**

List of Recommendations

Recommendation 1: Provide dedicated investments to advance a One Health/One Welfare framework across Canada.

Recommendation 2: Provide ongoing funding to phase out toxicity testing on animals by 2035, including:

- a. Dedicated funding for the development and full implementation of the federal 2035 strategy to guide the replacement, reduction, or refinement of vertebrate animals in toxicity testing under the *Canadian Environmental Protection Act, 1999* (CEPA).
 - Include clear goals and timelines identified in collaboration with key partners and stakeholders.
 - Outline a long-term strategy to begin phasing out animals testing for scientific research and education purposes.
- b. Dedicated and sustainable funding towards the development and validation of alternative testing methods.

Recommendation 3: Continue efforts to maintain the designation of all plastic manufactured items as “toxic” under Schedule 1 of CEPA to support regulations aimed at reducing plastic waste and protecting health, animals, and the environment.



About AEL Advocacy

AEL Advocacy is a public interest law practice and not-for-profit organization based in Ontario. As Canada's only intersectional animal and environmental advocacy organization, we champion a holistic approach to legal advocacy that highlights the crucial connections between people, animals, and the environment. Our mission involves enforcing existing laws, offering legal support to individuals and organizations committed to animal and environmental protection, and advocating for stronger legislation to promote sustainable and compassionate practices for all.

As the federal government considers funding priorities for 2025 and beyond, AEL Advocacy urges the adoption of the following recommendations that align with our vision for a more sustainable and humane Canada.

Detailed Recommendations

Part I. Advance a One Health/One Welfare Framework

“One Health One Welfare is a concept that recognizes the interconnectedness of human health, animal health, and environmental health. It emphasizes that the health and welfare of humans, animals, and ecosystems are interdependent and bound together in a complex web of relationships. By focusing on the intersections of animal welfare within this framework, we underline the importance of ensuring the humane treatment, care, and well-being of animals as a critical component of the overall health of our society and planet.” - Humane Canada, 2024¹

The COVID-19 pandemic, along with the rise of other emerging infectious diseases and antimicrobial resistance, underscores the interconnectedness of human, animal, and environmental health.² With 75% of emerging infectious diseases being zoonotic, certain factors such as the expansion of intensive livestock farming and deforestation increase human-wildlife

¹ Humane Canada. (2024). *Programs and Projects*. <https://humanecanada.ca/en/your-humane-canada/programs-and-projects>

² See United Nations Environment Programme, “Bracing for Superbugs: Strengthening environmental action in the One Health response to antimicrobial resistance” (2024), online: <<https://www.unep.org/resources/superbugs/environmental-action>>; Food and Agriculture Organization of the United Nations, “One Health legislation: Contributing to pandemic prevention through law” (2020), online: <<https://openknowledge.fao.org/server/api/core/bitstreams/7542d2b2-00e1-4d23-be33-4a39422e3210/content>>.

interactions, heightening disease risks.³ Addressing these challenges requires interdisciplinary and cross-sectoral strategies focused on disease prevention, biodiversity conservation, climate change, and sustainable development.

A One Health/One Welfare approach involves designing and implementing programs, policies, legislation, and research that recognizes the interconnections between human welfare, animal welfare, and environmental integrity.⁴ Beyond preventing and mitigating communicable diseases, One Health/One Welfare works to advance public health initiatives across the social determinants of health. For example, One Welfare considers mental health and wellness issues that crosscut humans and animals, such as the violence link,⁵ human-livestock interactions to promote welfare and productivity, and connections between animal neglect and human health. This framework fosters multisectoral and intergovernmental collaboration, encouraging partnerships among governments, veterinarians, health professionals, industry stakeholders, academia, and ecologists.

This approach should be integrated into Canadian public health, food safety, environmental protection, emergency management, and pandemic preparedness efforts. By incorporating these principles into law and policy development and securing sustainable funding, Canada can better prevent zoonotic diseases and enhance public health outcomes.

Building capacity and securing sustainable funding are essential for effective engagement in One Health/One Welfare initiatives. As an emerging framework, **One Health/One Welfare requires dedicated federal investments for the development and implementation of a national action plan.** Such a framework and action plan will help Canada become more resilient against zoonotic diseases and enhance public health outcomes linked to the social determinants of health.

Investing in One Health/One Welfare also aligns with global health priorities. The global Quadripartite Group, including the FAO, UNEP, OIE, and WHO, leads the development of this

³ Food and Agriculture Organization of the United Nations, “One Health legislation: Contributing to pandemic prevention through law” (2020), online: <https://openknowledge.fao.org/server/api/core/bitstreams/7542d2b2-00e1-4d23-be33-4a39422e3210/content> referencing Taylor, L.H.; Latham, S. M. & Woolhouse, M.E., 2001. Risk factors for human disease emergence. Philosophical Transaction of the Royal Society of London, Series B, Biological Sciences, 356 (1411) 983-989.

⁴ See [https://spca.bc.ca/faqs/one-health-one-welfare-lens-to-evaluate-all-policy-decisions/#:~:text=The%20One%20Health%20%2F%20One%20Welfare.and%20linked%20in%20numerous%20ways](https://spca.bc.ca/faqs/one-health-one-welfare-lens-to-evaluate-all-policy-decisions/#:~:text=The%20One%20Health%20%2F%20One%20Welfare.and%20linked%20in%20numerous%20ways;); <https://www.animalhealthcanada.ca/work-areas/one-welfare>; <https://www.animalhealthcanada.ca/work-areas/one-welfare>

⁵ Law Society, Newfoundland and Labrador. (2019). *The Violence Link in Practice – And Empirical Examination of the Implication of the Violence Link for Family Justice Professionals.* <https://lsnl.ca/the-violence-link-in-practice-an-empirical-examination-of-the-implications-of-the-violence-link-for-family-justice-professionals/>; Humane Canada. (2024). *Violence Link Professionals.* <https://humanecanada.ca/sector-professionals/violence-link-professionals>

framework internationally. Canada's integration of this framework into legislative, policy, and governance strategies will promote cooperative federalism and collaborative efforts across all levels of government.

Recommendation 1: Provide dedicated investments to advance a One Health/One Welfare framework across Canada.

Part II. Phase Out Toxicity Testing on Animals by 2035

AEL Advocacy commends the federal government for its commitment to deliver on its election platform to phase out toxicity testing on animals by 2035⁶, as demonstrated by the passage of Bill S-5. This is in alignment with 40 other countries who have passed similar legislation.⁷ However, in order to achieve this goal, **ongoing and dedicated federal funding is needed to fully develop and implement a 2035 strategy with clear goals, timelines, and stakeholder collaboration.**

In 2022, a lack of investment, innovation and overall progress in this area resulted in more than 3.5 million animals being used for toxicity testing, scientific research and education.⁸ Of these animals, 105,253 were assigned to “Category E”, which causes “severe pain near, at, or above the pain tolerance threshold of unanesthetized conscious animals” and can include “burn or trauma infliction on unanesthetized animals... exposure to drugs or chemicals at levels that (may) markedly impair physiological systems and which cause death, severe pain, or extreme distress.”⁹ The immense suffering of animals in these tests is unacceptable. AEL Advocacy urges the federal government to **extend the 2035 strategy beyond toxicity testing to include a long-term plan for phasing out animal testing for scientific research and education purposes.**

There is an urgent need for alternative methods to animal testing that are humane, faster, and more relevant to the complexities of human biology. The OECD recently called for the “urgent

⁶ Liberal Party of Canada. (2024). *2021 Platform, Protecting Animals*. <https://liberal.ca/our-platform/protecting-animals/>

⁷ See

<https://ottawahumane.ca/the-end-of-chemical-testing-on-animals/#:~:text=More%20than%2040%20countries%20worldwide,sha ving%20creams%2C%20deodorant%20and%20more.>

⁸ Canadian Council on Animal Care. (2023) *Animal Data Report, 2022*.

https://ccac.ca/Documents/AUD/CCAC_Animal_Data_Report_2022.pdf

⁹ Ibid.

mobilisation of national and regional resources to support the validation of new methods for the safety testing of chemicals...with the aim to accelerate the pace of chemical safety testing and assessment, reduce the use of laboratory animals and to better protect human health and the environment.”¹⁰ **The development and validation of alternative testing methods, such as New Approach Methods¹¹, requires ongoing and dedicated federal investments, and needs to be included in the federal government’s 2035 strategy.**

The use of outdated animal testing methods impacts society, including the effectiveness and safety of products we use and consume, the quality and effectiveness of research and education, and the welfare of millions of animals. Dedicated federal investment in this area will spare the lives of animals, align Canada with the progress made by global partners, and advance research and innovation for Canadians.

Recommendation 2: Provide ongoing funding to phase out toxicity testing on animals by 2035, including:

- a. Dedicated funding for the development and full implementation of the federal 2035 strategy to guide the replacement, reduction, or refinement of vertebrate animals in toxicity testing under the *Canadian Environmental Protection Act, 1999 (CEPA)*.**
 - **Include clear goals and timelines identified in collaboration with key partners and stakeholders.**
 - **Outline a long-term strategy to begin phasing out animals testing for scientific research and education purposes.**
- b. Dedicated and sustainable funding towards the development and validation of alternative testing methods.**

¹⁰ OECD. (2023). *OECD Test Guidelines for Chemicals*.

<https://www.oecd.org/chemicalsafety/testing/oecdguidelinesforthetestingofchemicals.htm>

¹¹ Government of Canada. (2023). *Use of New Approach Methods (NAMS) in Risk Assessment*.

<https://www.canada.ca/en/health-canada/services/chemical-substances/fact-sheets/use-new-approach-methods-risk-assessment.html>

Part III. Continue Efforts to Maintain Designation of Plastics as a Toxic Substance under CEPA

Plastic pollution is a significant environmental and health issue in Canada, as businesses and individuals throw away over 3 million tonnes of plastic waste each year.¹² This has detrimental impacts on our ecosystems, wildlife, waterways, economy and public health.¹³ The federal government has set commitments and benchmarks to achieve zero plastic waste by 2030, which includes banning the manufacturing of harmful single-use plastics and the implementation of the zero plastic waste action plan. While AEL Advocacy is encouraged by these action-orientated commitments, ongoing progress and transparency are needed to meet these goals.

As part of these efforts, AEL Advocacy recognizes the federal government’s work to include *plastic manufactured items* in the list of toxic substances under CEPA. This will allow the federal government to ban harmful plastics and pass additional regulations. While plastic manufacturers and distributors recently challenged this case and won, **AEL Advocacy, who worked as an intervener, calls on the federal government to monitor the decision of this appeal, and continue the work to ensure plastic stays listed as a toxic substance under CEPA (in the event of an unfavourable decision).** This achievement will have substantial long-term impacts on the health of Canada’s wildlife, ecosystems, human health and our economy.

Recommendation 3: Continue efforts to maintain the designation of all plastic manufactured items as “toxic” under Schedule 1 of CEPA to support regulations aimed at reducing plastic waste and protecting health, animals, and the environment.

Conclusion

As funding priorities for the 2025 Federal Budget are considered, AEL Advocacy urges the federal government to consider these recommendations to promote a more sustainable, humane,

¹² Environment and Climate Change Canada. (2021). *Zero Plastic Waste: The Need for Action*.

<https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/reduce-plastic-waste/need-action.html>

¹³ Health Canada (2024). *Government of Canada Funding Research on the Health Risks of Microplastics*.

<https://www.canada.ca/en/health-canada/news/2024/01/government-of-canada-funding-research-on-the-health-risks-of-microplastics.html>



and resilient Canada. Investing in these areas will advance public health, animal well-being, and environmental protection, ensuring a better future for all.

We thank you for the opportunity to provide recommendations on the next federal budget and for your consideration of this matter.

With regards,

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