



## Farm Animal Council of Saskatchewan Inc.

November 16, 2001

The Hon. Anne McLellan, PC, MP  
Minister of Justice and Attorney General of Canada  
12304-107 Avenue  
Edmonton, AB T5M 1Z1

By fax: 780-495-2598

Dear Minister McLellan:

### RE: Bill C-15b Cruelty to Animals

As you are aware from previous documentation forwarded to you (dated April 15, 2000), FACS has taken a consistently firm position that the new proposed 'Cruelty to Animals Bill' needs to provide up-front protection for animal users. We want to ensure legitimate practices will not be at risk, particularly given the current and ongoing actions of litigiously aggressive, well-funded animal rights groups.

We believe that a simple addition to the Bill will solve the concerns of livestock and poultry producers while in no way detracting from the intent of the Bill. The **Poultry Welfare Coalition** has provided an example to you of how the protection offered in Section 429(2) can be brought forward into the proposed Bill. We support this.

We ask that the Bill explicitly and clearly articulate the principle that it: ***"Will not alter or criminalize any activity which is otherwise regulated or authorized by federal and provincial legislation or applicable codes of practice, such as normal agricultural practices, hunting, fishing, trapping, ritual slaughter, animal research or food production."*** (Dept. of Justice, Canada Aid to Interpretation of Bill C-17, April 2000).

Regarding the definition of animals, the proposed Bill says, ***"Animal means a vertebrate other than a human being and any other animal that has the capacity to feel pain."*** In the Saskatchewan Animal Protection Act (and similarly the Manitoba and Alberta Acts) the definition of ***Animal means "any animal other than a human being."*** Is there a reason why this definition would not be considered?

We support the proposed changes, in the interest of modernizing the law and increasing penalties, but remain firm in our position that up-front protection, for those who raise animals for the overall benefit of society, is articulated in the law.

FACS has reached this position based on lengthy Board discussion and analysis. The FACS Board, comprised of representatives from the livestock and poultry industries, has engaged in ongoing communication with the Alberta Farm Animal Care Association (AFAC) which has sought input from Guy Fontaine, a criminal lawyer, delegate to the Alberta Cattle Commission, and Vice-Chairman of AFAC as well as Irv Yaverbaum, Senior Policy Analyst at Alberta Justice.

If you would like to meet with myself and our counterparts in Alberta, I would very pleased to travel to Edmonton at your convenience.

Sincerely,

Adele Buettner, Executive Director, FACS