

Guiding Points for PAWS Act Public Consultation

The Ontario Ministry of the Solicitor General is considering developing exceptions related to select puppy mill prohibitions in the PAWS Act. Following are some insights and recommendations to help CKC members shape the legislation to be reasonable, non-discriminatory, and enforceable:

Summary of Key Government Proposed Exception(s) in the PAWS Act	CKC Recommendations to support CKC Members Re: Public Consultation
<p>1. Failing to isolate a dog from other dogs or animals and objects (including food and water containers) that are used by other dogs or animals, where the dog is suffering from a contagious disease or at high risk of developing a contagious disease.</p> <p>Government Proposed Exception: Except where a veterinarian has advised, in writing, that isolation is unnecessary.</p>	<ul style="list-style-type: none"> • Support this requirement but note that the proposed legislation relies only on the visible signs of illness before isolation is required. Many contagious diseases in dogs do not present obvious symptoms initially but can still be highly transmissible during this latent period. • Encourage the Government to enforce existing standards of care in the PAWS Act that can be measured, enforced, and amended over time as science evolves, in addition to stiffer penalties.
<p>2. Breeding a female dog for the first time before its second heat.</p> <p>Government Proposed Exceptions: No exceptions.</p>	<ul style="list-style-type: none"> • Request an exception for CKC registered dogs and all dogs registered with Breed Associations under the <i>Animal Pedigree Act</i> because: <ul style="list-style-type: none"> ○ This blanket statement does not apply to all dogs as they can vary significantly based on their breed and genetics, and health status. E.g. small breeds have different heat cycles than large breeds.
<p>3. Breeding dogs and breeding a parent dog with any dog in one of their litter, or breeding sibling dogs.</p> <p>Government Proposed Exception: No exceptions</p>	<ul style="list-style-type: none"> • Request an exception for CKC registered dogs and all dogs registered with Breed Associations under the <i>Animal Pedigree Act</i> because: <ul style="list-style-type: none"> ○ This is a complex issue that requires further review by breeding and canine reproductive experts. ○ Responsible CKC member breeders already utilize the coefficient of inbreeding (COI), a valuable tool in breeding programs), which is established by most breed registries and dog guide schools.
<p>4. Separating a puppy from its mother or substituting a mother before the age of 56 days (8 weeks).</p> <p>Government Proposed Exception: Exception in cases where veterinarian recommends, in writing, that a puppy may be separated from its mother or substitute mother before the age of 56 days for health and welfare reasons (i.e., if a mother rejects a puppy or other littermates are showing aggression toward a puppy).</p>	<ul style="list-style-type: none"> • Request an exception for CKC registered dogs and all dogs registered with Breed Associations under the <i>Animal Pedigree Act</i> because: <ul style="list-style-type: none"> ○ This requirement can already be effectively addressed through the existing standards of care outlined in the PAWS Act. ○ The age of 8 weeks is still not backed by behavioral research, yet there is profound research that that enrichment and socialization in the first 2 – 12 weeks of life (which may require intermittent separation from the mother) is more beneficial to the prevention of behavioral problems in adult dogs than the presence of the dam. ○ Resource on behaviour in neonates in first few months: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9655304/#sec4-animals-12-02895title • Suggest that the Government should re-write the regulation to permit ‘temporary separation’ for the purposes of weaning and socialization. Temporary separations can be beneficial and are often used by responsible breeders to initiate critical socialization and training protocols that contribute to a puppy’s well-rounded development. Therefore, ‘permanent separation’ for the purposes of transferring or selling a puppy should be specifically stated with regards to the regulation.

