

May 25, 2016

The Honourable Norm Letnick  
Ministry of Agriculture  
PO Box 9120 Stn Prov Govt  
Victoria, BC, V8W 9B4

**RE: UBCM Response to 'Consultation Paper: The Dog & Cat Breeding Industry in BC'**

Dear Minister Letnick,

Thank you for providing the Union of BC Municipalities (UBCM) with the opportunity to respond to the Ministry of Agriculture's consultation paper on commercial dog and cat breeding. UBCM has reviewed the document and the President's Committee of the UBCM Executive agreed to provide the following response.

In general, UBCM is supportive of measures to improve animal welfare in BC and to reduce the opportunities for the neglect and abuse of dogs and cats within commercial breeding operations. However we have noted some concerns about the consultation process and potential for impact on local government.

**Consultation Paper & Process**

UBCM was invited to review the draft consultation paper in mid-April and advised that the deadline for responses would be May 18. Upon review, we noted that the paper is fairly high-level and does not provide clear direction on how a regulatory system for commercial dog and cat breeding would work in BC.

We also noted that minimal consideration was given to the fact that many local governments have current bylaws that cover dog kennel, cattery or breeder licensing, or other animal care standards, or what role local governments would be expected to play in a new provincial system.

Finally, the consultation paper does not address how a new provincial licensing system would be resourced or funded. As demonstrated by the Manitoba experience, resource limitations can be a constraining factor in the success of a licensing system and to the overall goal of protecting animals at dog and cat breeding facilities.

In terms of the overall consultation process, we were disappointed to learn that the Ministry did not plan to consult directly with local governments despite the fact that recent research by the BC SPCA indicates that more than 80 local government have existing bylaws that could be impacted by a new provincial licensing system.

In addition, we noted that the main data collection tool developed by the Ministry to inform the consultation process was an on-line survey that was intended for breeders only.

### Impact on Local Government

UBCM has identified three potential areas of impact of a new provincial licensing and monitoring system for commercial dog and cat breeding:

- Impact on existing bylaws (e.g. zoning, animal control, business licenses)
- How administration of a licensing system would work and any expectations for involvement by local government.
- How monitoring of breeding operations, including enforcement of any new requirements for breeders, would work and any expectations for involvement by local government.

It is difficult to provide feedback to the Ministry on the proposal for licensing of dog and cat breeding without understanding the Provincial government's intent in relation to the above points. However, we have heard from some UBCM members that local governments should not be expected to play a direct role in any new licensing or monitoring system as they do not have the resources, capacity or technical knowledge to administer or enforce commercial breeding regulations.

In discussions with Ministry staff, we understand that a summary of the consultation process will be prepared shortly and will identify next steps in developing the proposed regulatory framework for commercial dog and cat breeding. We have invited Ministry staff, in partnership with the BC SPCA, to submit a session proposal for UBCM's 2016 Convention in order to present the consultation summary and identified next steps directly to local government delegates in September.

In closing, and to help address our concerns outlined above, we would like to request continued consultation with UBCM – and directly with local governments – as a licensing and/or monitoring system is further developed and more clarity on the identified impacts on local government are available.

We look forward to continued discussions with the Ministry on this file.

Sincerely,



Al Richmond, President

cc: *The Honourable Peter Fassbender, Minister of Community, Sport & Cultural Development*  
*Anna North, Senior Policy Analyst, Ministry of Agriculture*