

Montreal, February 8, 2013

Madeleine Fortin
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MAPAQ
General Administration of animal Health and food inspection
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Re: Suggestions / Recommendations for the "Regulations Amending on the safety and welfare of cats and dogs." (P-42)

Ms. Fortin,

Hereby, the Society for the Protection of Animals (SPA) Canada wants you to share his concern about the ministerial inaction on the issue of pets. It seems rather surprising that in 2013, Quebec still houses some 2,000 unregulated institutions such as "puppy mills," which earned him the reputation as the cradle of Canadian animal cruelty. But, fortunately, years of struggle against animal abuse, delivered by awareness organizations like ours, have guided the Quebec population to an awareness of the highly deficient production and marketing of pets in the province. It is time for citizens to claim an animal management in the image of an advanced society.

Although the organization welcomes the readiness of MAPAQ to make detention mandatory licensing for guards of 15 animals or more, the ministry continues, as it has always done, to turn around the real problem. Indeed, the proposed regulation is deficient because it does not impose any limit on the number of animals that have no owner, allowing puppy mills to continue to proliferate. Also, the Department did not have intention to revoke permits for breeders offender of animal welfare, especially that licensing requires no installation inspection. Therefore, such a permit system may seem like a step in the right direction, but still had no impact on the origin of the debate: the overproduction animal.

The organization has therefore a duty to share with you briefly what it considers practical measures that would use public funds wisely.

At first glance, the sale and possession of non-sterile animals, regardless of the number must always be prohibited. The imposition for operators of a maximum bitches and production quotas is inevitable and must be determined by the Ministry based on the capacity of the facilities of each institution. A bitch should not have more than one litter annually; otherwise it is set to develop health problems. Vigorous and repetitive inspections must ensure that the holders of these permits are forced to comply with your regulations.

What is to legislate if we do not provide the means to enforce our laws?

In sum, it should be illegal for a distributor to buy outside of shelters homeless animals, to

counter overcrowding, and allow the services of pounds to cease administering the death unnecessarily and excessively to animals in perfect Health, pretexting the congestion

All evidence, a moratorium is essential to curb the emergence of new outlets animals in the province, and the export of animals from unregulated production. In a similar vein, the Department should pay special attention to e-commerce. Restrict and supervise producers, have inevitably the supply perverse distribution of animals over the Internet, which can not be tolerated by MAPAQ when claiming conscious of animal welfare.

According to the SPA Canada, it is high time that MAPAQ ceases to amend regulations without real impact and implement deterrent measures to curb the scourge. Ontario, for example, has more than 200 inspectors at its disposal, while in Quebec, only forty individuals covers the entire Province. Even more, since the announcement of coming cuts in different departments, it seems quite disturbing for the voiceless. Also, several major Canadian cities have acquired ethical animal management systems, funded by taxpayers, including Montreal soon. This is among other examples of concrete measures, helping to advance the cause.

In short, we believe that we are in the presence of a draft regulation that will not deep enough and allow personal misinterpretation.

Hope that one day, the ministry will set up concretes disincentives measures, please accept Madam, greetings.

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c. c. François Gendron, MAPAQ and Minister Pauline Marois, Prime Minister