

Dear Honourable colleague

As the Member of Parliament for Labrador, I am writing today to outline some important concerns I have with Bill C-246 and the impact it will have on rural and northern regions of our country.

Last October, our Party achieved significant success in rural regions of Canada and in the North, with the trust of Canadians that this government will ensure our shared history in hunting, fishing, and trapping is preserved. Our government has a clearly stated objective of establishing a nation-to-nation relationship with Indigenous Canadians, who are watching with anticipation that our government will support their communities and traditional activities.

As such, I would like to outline some key concerns I have with the legislation as proposed:

- Lack of definition of an animal – while this may seem trivial, does this extend to invertebrates or household pests? Commercially fished species as well as recreational or indigenous fishing? Certainly Bill C-246 intends to cover some fish species such as sharks.
- A new test of “recklessly” added to “willfully” under section 182.1 for causing unnecessary pain, suffering, or injury to an animal – expanding the kind of conduct that could become criminal “of one who sees the risk and takes the chance” that pain or suffering may occur. **For any hunter, trapper, and fisher this risk is inherent, even if they are practicing their sport, commercial, or traditional activity lawfully and by prescribed socially accepted practices**
- “brutally or viciously, *regardless of whether the animal dies immediately*” added under 182.2(1) – currently the killing of an animal is not the focus of the criminal code, but the cruelty in which it is attempted or done that is evaluated and punished this moves well beyond that scope. **Certainly any traditional Indigenous or northern hunting, trapping, or fishing falls under this category – even if they have a legal right to do so. Whether the animal dies immediately is irrelevant, the qualitative assessment of how “brutal” or “vicious” the visual scene is most important in this bill - such as sealing or trapping.**
- Conflicts and exemptions – Bill C-246 does not have a list of exemptions for specific lawful activities such as ranching, hunting, fishing, trapping, medical research etc. this Bill may create a conflict of laws, making existing legally regulated activities illegal by the very nature of their existence.
- Constitutional issues – Bill C-246 may effectively render hunting, fishing, trapping, ranching and other heritage and Indigenous activities illegal because they are “brutal or vicious” or may have an inherent “reckless” level of risk inherent in the activity. These are provincial areas of jurisdiction and cannot be made illegal by federal laws.

I am certainly supportive of protecting animals under the care of humans from needless harm and acts of cruelty. I am very concerned that Bill C-246 may extend person rights to animals rather than controlling the behaviour towards animals. The loose and vague language can easily create loopholes that can be used to persecute and prosecute Canadians and Indigenous people for carrying out legally and socially accepted and traditional or heritage activities that cause no undue suffering to any animals.

Thank you for your consideration,

Sincerely,

A handwritten signature in black ink, appearing to read 'Yvonne Jones', with a stylized, cursive script.

Yvonne Jones
MP for Labrador