



# Saskatchewan Wildlife Federation

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April 06, 2016

Honourable Ralph Goodale  
310 University Park Drive  
Regina, SK. S4V 0Y8

Dear Mr. Goodale,

The Saskatchewan Wildlife Federation (SWF) proudly represents over 34,000 members from 123 branches across Saskatchewan and is considered to be, per capita, the largest wildlife conservation organization of its kind in the world.

We are writing today to voice our deep concerns regarding the recently introduced Bill C-246.

The sponsor of Bill C-246 has suggested that the bill focuses entirely on the trade in cat and dog fur, the sale of shark fins, and updates to the Criminal Code to assist with prosecutions of those who unnecessarily harm animals. Said MP has also suggested that the bill is exactly what the Department of Justice wants, and that it does not negatively impact upon responsible anglers, hunters, farmers or others engaged in the responsible, sustainable, and lawful utilization or harvest of animals.

While we can easily and even eagerly support the notions underscored by the first two measures noted above, the inclusion of the last point, particularly given the absence of certain definitions and the widening of certain offences, leads to potential criminalization of animal use community activities. This means that Bill C-246 goes well beyond mere updates to the Criminal Code and protections that most could support. In fact, Bill C-246 expands into contentious and legally questionable issues that led to the defeat of many similar bills previously presented.

In the past, the outdoor community, which contributes \$15.2 billion annually to the national economy, and our colleagues in the agricultural, religious, medical research, science, and post-secondary sectors have opposed similar legislation. We respectfully ask that you vote against Bill C-246 on Second Reading, and urge your colleagues in the Liberal caucus to do the same.

For your benefit, we have attached a list of key points on Bill C-246 that outlines some of our major concerns with the legislation.

Thank you in advance for your time and attention in this important matter.

Yours in Conservation,

Darrell Crabbe  
Executive Director  
Saskatchewan Wildlife Federation

CC: SWF Board of Directors

## Key Points on Bill C-246

- Animal use communities can support a prohibition of shark finning and a ban on the sale of dog and cat fur, but despite the claims of the author of the bill, C-246 goes far beyond this stated intention.
- A legal review of the legislation clearly demonstrates that the author's claims that hunting, fishing and trapping will not be affected are clearly untrue.
- The Criminal Code sub-part "Cruelty to Animals" already has comprehensive provisions that criminalize various kinds of cruelty to animals, while protecting traditional uses.
- All of these activities are also subject to federal and provincial laws and regulations under a wide variety of departments such as the Fish and Wildlife Conservation Act.
- If passed, Bill C-246 would criminalize activities deemed lawful and regulated under these laws.
- Bill C-246 uses language that is not in line with other definitions used in the Criminal Code.
- The bill proposes to remove animals from the property section of the Criminal Code and move them into a section that would give animals rights similar to persons.
- The bill includes new provisions that would expand the type of conduct that could be criminalized.
- The bill contains a definition of animal not currently in the Criminal Code that would include birds and fish.
- The bill removes exceptions in the Criminal Code and makes no mention of excluded activities or existing uses that are currently included in the law.
- The bill removes language that currently affords protection for activities like fishing, hunting and farming and adds language that will jeopardize anyone engaged in these and other animal use activities.
- The bill would leave the definition of 'gross negligence', 'brutally and viciously' and 'unnecessary pain' open to interpretation by the courts.
- The changes in the bill would ignore decades of case law that currently exists.
- The bill is vague, ambiguous, poorly drafted and full of holes.
- The bill clearly reflects an animal protection driven philosophy, was written with input from the animal protection community and is reflective of their goals, but there has been no consideration of the impact on or consultation with animal use communities.
- In the past, similar bills were defeated because they did not reflect the will of Parliament.
- Animal use communities make major contributions to the country and employ millions of Canadians.
- For example, hunting, fishing, trapping and outfitting contribute \$15.2 billion annually to the national economy.
- Livestock and poultry producers contribute more than \$22 billion annually.
- Commercial fishing contributes over \$2.5 billion annually.
- These and other animal use communities will be seriously impacted if Bill C-246 passes.
- Amending a bad bill at Second Reading or in Committee will not fix what is wrong with it.
- Contact local Liberal MPs and urge them to vote against Bill C-246 at Second Reading.