

July 24, 2024

Hon. Sylvia Jones
Minister of Health
5th Floor-777 Bay St.
Toronto, ON M7A 2J3

Via email

Dear Minister Jones:

Re: Infectious disease risks associated with penned dog hunting in Ontario

We are writing to request urgent action to prevent risks associated with the spread of *Echinococcus multilocularis* in Ontario caused by the Ministry of Natural Resources' decision to issue new licences for penned dog hunting facilities. "Train and trial" areas allow live wild animals, including foxes and coyotes, to be trapped from the wild, transported in small cages, and kept in a fenced-in area to be used as live bait for dogs. They are widely regarded as inhumane and are prohibited in all other Canadian provinces and the majority of American states.

Although Ontario banned the issuance of new licences for these facilities in 1997, the province now plans to issue licences this year to allow new facilities to open. Regulations to allow new licencing could be introduced at any time. As Canada's leading animal protection groups, we have voiced concerns repeatedly about animal welfare risks associated with the expansion of penned dog hunting in this province. We are writing to you because this practice also poses serious infectious disease risks which, to date, have been ignored by the Ministry of Natural Resources.

Echinococcus multilocularis is a parasite that causes alveolar echinococcus (AE) in humans. Since it was first detected in Canadian wildlife in 2012, *Echinococcus multilocularis* has spread and is now present in approximately 23% of coyotes and foxes in Southern Ontario.¹ In dogs, the parasite is most common in hound breeds used for hunting.²

Humans who are in contact with infected dogs, coyotes, or foxes can become infected, leading to the development of AE.³ Though individuals often remain asymptomatic for many years, tumor-like lesions slowly develop in their bodies, most frequently on the liver.⁴ Lesions may also

¹ Jonathon D. Kotwa et al, "*Echinococcus multilocularis* Infection, Southern Ontario, Canada" (2019) 25:2 Emerg Infect Dis 265.

² Toews, E., Musiani, M., Smith, A. *et al.* Risk factors for *Echinococcus multilocularis* intestinal infections in owned domestic dogs in a North American metropolis (Calgary, Alberta). *Sci Rep* **14**, 5066 (2024).
<https://doi.org/10.1038/s41598-024-55515-6>.

³ "Echinococcus multilocularis" (21 February 2024): <https://www.publichealthontario.ca/en/Diseases-and-Conditions/Infectious-Diseases/Vector-Borne-Zoonotic-Diseases/Echinococcus-multilocularis>

⁴ "Echinococcosis" (17 May 2021): <https://www.who.int/news-room/fact-sheets/detail/echinococcosis>

spread to other organs. By the time an infected individual experiences pain and other symptoms, surgery and prolonged monitoring and drug therapy are generally the only treatment option.⁵ However, AE is often misdiagnosed, and if it is left untreated, AE can be fatal.⁶

By issuing licences for new penned hunting facilities, Ontario will enable more direct interaction between humans, infected wild canids, and dogs through the trapping and transport of wild coyotes and foxes,⁷ as well as life-long confinement of foxes and coyotes in enclosed pens into which hunting dogs are repeatedly released, resulting in dogs having direct contact with trapped animals' feces as well as with the animals themselves when they attack, maim, and kill them.⁸ Dogs used for tracking and hunting in these facilities can themselves spread the parasite through subsequent contact with humans, dogs, and other animals.

Because of the serious public health threat that it poses, *Echinococcus multilocularis* has been designated a communicable disease of public health significance under the *Health Protection and Promotion Act*. Although Animal Justice and Coyote Watch Canada shared these public health concerns with the Ministry of Natural Resources in their March 2024 application to review legislative changes made to enable new licencing of penned hunting facilities, the Ministry dismissed these concerns summarily in its June 10, 2024 decision to reject their application. The Ministry stated merely that it “is not aware of evidence to suggest that wildlife being kept in train and trail areas, present a risk to human health.”

We request that Public Health Ontario urgently contact the Minister of Natural Resources to ensure risks associated with the spread of *Echinococcus multilocularis* are given due regard. While we believe the Ministry's plans to issue new licences should be cancelled entirely, at the very least, we urge you to ensure that prior to proceeding, the proposed activity undergoes a rigorous assessment of public health risk, with measures implemented to mitigate current zoonotic potential and protect against the spread of *Echinococcus multilocularis*.

Yours truly,

Kaitlyn Mitchell
Director of Legal Advocacy
Animal Justice

Rob Laidlaw
Executive Director
Zoocheck Inc.

Lesley Fox
Executive Director
The Fur-Bearers

Dr. Toolika Rastogi
Senior Manager, Policy & Research
Humane Canada

⁵ See: <https://www.cbc.ca/news/canada/edmonton/coyotes-echinococcus-multilocularis-alberta-1.6970627>

⁶ “Echinococcus multilocularis” (21 February 2024): <https://www.publichealthontario.ca/en/Diseases-and-Conditions/Infectious-Diseases/Vector-Borne-Zoonotic-Diseases/Echinococcus-multilocularis>

⁷ See: <https://www.cbc.ca/news/canada/toronto/ontario-dog-hunting-1.6860189>.

⁸ Contrary to claims made by penned hunting proponents, a 2023 exposé by Animal Justice demonstrates that wild animals are frequently attacked, injured, and/or killed in these facilities. See: <https://animaljustice.ca/exposes/undercover-dog-hunting-pen>.

Drew Woodley
Director of Government Relations
Ontario SPCA

Lesley Sampson
Founding Executive Director
Coyote Watch Canada

Lia Laskaris
Chief Executive Officer
Animal Alliance of Canada

Kelly Butler
Wildlife Campaign Manager
Humane Society International/Canada

CC: Minister Graydon Smith
Minister Rob Flack
Dr. Greg Worley, Chief Veterinarian for Ontario
Dr. Tamara Wallington, Chief Health Promotion and Environmental Health Officer,
Public Health Ontario