Science Advancement & Outreach
A DIVISION OF PETA

1536 16th St. N.W., Washington, DC 20036

January 9, 2026

Ontario Ministry of Agriculture, Food and Agribusiness (OMAFA)

Via e-mail: ara.omafa@ontario.ca

Re: Proposed Legislative Amendments to the Animals for Research Act and Prospective Amendments to Regulations under the Act

I am writing on behalf of Science Advancement and Outreach (SAO), the biomedical research policy division of People for the Ethical Treatment of Animals (PETA). PETA entities have more than 10.4 million members and supporters worldwide, including 225,000 in Ontario.

Strengthening the Animals for Research Act is long overdue. Aligning provincial policy with global shifts toward ethical, scientifically robust, animal-free research practices—already underway in the EU, India, the UK, the US and other leading research nations—positions Ontario to play a leadership role in reforming research oversight.

Under the Proposed Legislative Amendments to the Animals for Research Act and Prospective Amendments to Regulations under the Act,[1] the Ontario Ministry of Agriculture, Food and Agribusiness (OMAFA) should implement the following:

- *All research, including permitted invasive medical research on cats and dogs as well as other research (involving cats, dogs or other animals), would have to meet specific conditions to be set out in regulations.*
- *The roles and responsibilities of animal care committees associated with registered research facilities would be more clearly set out, including approval and oversight of research, documenting monitoring of research protocols, and ordering changes to or stopping research that does not align with requirements.*
- *Operators of supply facilities in Ontario would be prohibited from breeding cats or dogs for research purposes.*
- *Amended provisions would clarify that animals, including cats or dogs, may be sold, given away or transferred (e.g., rehomed or adopted out) when no longer needed by the research facility (under the written direction and guidance of the research facility's animal care committee, to safeguard the health and welfare of the animals).*

OMAFA should implement the following Proposed Legislative Amendments to the Animals for Research Act and Prospective Amendments to Regulations under the Act[2] **provided they result in certain outcomes**:

- *The Director's responsibilities to register and renew registrations of research facilities under the ARA would be modified to provide additional clarity about the factors that could be considered*.

    - This amendment should be accepted if it spells out more clearly what factors the Director can consider when deciding whether to approve or renew a facility's registration. This amendment should also result in stricter and more consistent review of how animals are being cared for, how experiments are conducted, and whether the facility is making a measurable effort to reduce animal use.
- *The offence and penalty framework in the current statute would be replaced by a new one, setting out minor offences and major offences and new maximum penalties for each category that aligns broadly with the framework that exists currently in the Provincial Animal Welfare Services Act, 2019.*
    - This amendment should be accepted if the goal is to replace outdated or vague penalties with clearer, more actionable ones. The result of this amendment should be increased enforcement and stronger deterrence for violations.
- *Various technical amendments would also be made, including with respect to the registration of research facilities.*
    - These various amendments should be accepted if they will result in greater enforcement of new or existing standards, eliminate loopholes, and improve the welfare and well-being of animals used in experimentation, testing, and teaching.

These reforms represent an important and welcome first step. OMAFA should extend these protections to all animals used in experimentation, testing, and teaching, not only cats and dogs. Limiting enhanced protection to select species risks perpetuating inequities in oversight and leaving millions of other sentient animals subject to the same harmful and ineffective research practices.

In 2024 alone, more than 3.7 million animals[3] were used in experiments at Canadian Council on Animal Care-certified institutions for medical training, curiosity-driven experimentation, and regulatory testing. Before their deaths, many were forced to inhale toxic fumes, immobilized in restraint devices for hours, subjected to invasive surgical procedures, or exposed to severe physical trauma. Beyond the experiments themselves, animals in laboratories are typically confined to small, barren enclosures where they are deprived of social interaction, natural light, and meaningful environmental enrichment. Many never feel grass or soil beneath their feet, experience fresh air or wind on their faces, or engage in normal species-specific behaviors. Instead, they are treated as disposable tools rather than sentient beings with physical and psychological needs.

Despite the scale and severity of this use, Canada still lacks federal legislation governing the treatment of animals in laboratory or educational settings. Oversight is fragmented and largely voluntary, and private laboratories, where a substantial portion of animal experimentation takes place, operate with almost no external oversight. As a result, there are no restrictions on the level of cruelty inflicted on animals used in experiments—as recently witnessed in an investigation at Nucro-Technics in Scarborough.

Moreover, experiments on animals routinely fail to produce reliable or translatable benefits for human health. The most recent independent analysis shows that approximately 90% of basic research—most of which relies on animal experiments—never leads to effective treatments for humans.[4] Similarly, 95% of drugs that appear safe and effective in animal tests fail in human clinical trials,[5] most often because they do not work in humans or cause unforeseen harm. In some disease areas, failure rates exceed 95%,[6] and up to 89% of published preclinical experiments cannot be reproduced,[7] calling into question the scientific value of these practices altogether. Human-relevant approaches—such as advanced human cell–based models, genomics and proteomics, imaging

technologies, and computational modeling—are superior methodologies that can replace the use of animals, including cats and dogs.

Last year, Health Canada and Environment and Climate Change Canada released a new strategy emphasizing new non-animal approaches over outdated chemical testing on animals. The report's summary states: "As part of the strategy, regulatory needs that are currently being met through vertebrate animal testing will be identified, including those for which NAMs are available, are in development or need to be developed."[8] The transition to NAMs should not be limited to chemical testing and should be extended to basic research and disease modeling, where there is no legal mandate to use animal-based methods in the first place.

In line with the chemical testing strategy and by extending these protections to all animals used in research, Ontario can demonstrate global leadership in modernizing research oversight, reducing suffering, and advancing reliable, human-relevant science.

Thank you for the opportunity to provide comments on the proposed amendments. Our scientists, who have expertise in research, regulatory testing, and medical education, are available for consultation.

Sincerely,
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[2] *Ibid.*
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