

April 7, 2015

BC Ministry of Agriculture
PO Box 9043 STN PROV GOVT
Victoria, BC V8W 9E2
Sent via email to: agr.minister@gov.bc.ca

Attn: Honorable Norm Letnick

Re: CVBC Bylaws – Objection to Ministry Approval (Re: Inclusion of Ear Cropping Ban)

This letter is in opposition to the College of Veterinarians of British Columbia ('CVBC') Proposed Bylaws which have been, or are about to be, submitted to the Ministry for final approval.

We are part of a large group of canine-centered organizations and individuals who believe the ear cropping ban included in Part 4 Ethics and Standards, Clause 229 (1) and (2) Cosmetic Ear Cropping of Dogs is in contravention to the CVBC's duties and objectives under the Act, which include protecting the public interest and preserving animal welfare. We are therefore asking that the Ministry of Agriculture **reject** the CVBC revised bylaws and require that any changes impacting the right for licensed BC Veterinarians to perform ear cropping surgery not be considered until after a meaningful public consultation process is held.

Our rationale follows:

1. Only 21% of the CVBC membership voted, approximately **100 BC Licensed Veterinarians** voted to reject the proposed CVBC ear cropping ban included as part of their proposed revised bylaws. Many voiced their concerns for safe access to surgery and animal welfare.
2. A significant number of purebred dog breeds have cropped ears (ie. Miniature Pinschers, Boxers, Dobermans, Great Danes, Miniature Schnauzers, Cane Corso, and many, many others). A substantial portion of the public expects and demands cropped ears and the process will continue at some levels irrespective of a proposed ear cropping ban. The lack of access to surgery performed in a safe clinical setting in BC will lead to suffering and is therefore not in the best interests of animal welfare.
3. No meaningful public consultation has ever been carried out with respect to the ear cropping ban included in the revised CVBC bylaws. The only information available to non-CVBC members on the ear cropping ban was a single sentence buried (effectively 'hidden') on page 99 of Part 4 of a multi-Part set of draft bylaws, which was posted on the CVBC website about 45 days prior to the deadline for comments. Even if the public were monitoring the CVBC website it is unreasonable to expect a single clause would have been noticed.
4. The CVBC did not even notify the Canadian Kennel Club that they intended to include an ear cropping ban in their revised bylaws. Effectively this meant the CKC was unable to notify their members who could have in turn lobbied their veterinarians to reject the ear cropping ban. The CKC was eventually notified less than 4 days prior to the deadline for draft CVBC bylaw responses via information shared by a concerned veterinarian.
5. In spite of the less than 5 days' notice for the CKC and the purebred dog community to respond to the ear cropping ban, a significant number of individuals and organizations responded with their strong opposition to the proposed bylaws. A legal petition was also submitted. This opposition was ignored by the CVBC.
6. We believe the CVBC deliberately and strategically avoided highlighting the ear cropping ban in their proposed revised bylaws in an effort to avoid the public lobbying their veterinarians to reject the proposed bylaws.

Based on the reasons described above, we request the Ministry reject the proposed revised CVBC Bylaws and request that any future changes impacting ear cropping be subject to an open, and meaningful, public consultation process.

Respectfully submitted by:

Address:
Tel:
Email:

Advocate of: The Association for the Preservation of Purebred Dogs