

To: Mayor and Members of Township of Blandford-Blenheim Council

From: Dustin Robson, Development Planner, Community Planning

Applications for Official Plan Amendment and Zone Change OP 25-08-1 and ZN 1-25-05 – Matthew and Jacklynn Bowcott (Supplementary Report)

REPORT HIGHLIGHTS

- The subject Official Plan Amendment Application and Zone Change Application propose to include site-specific policies to permit an animal crematorium, approximately 929 m² (10,000 ft²) in size, as an on-farm diversified use (OFGU).
- Planning staff recommend that the application not be approved as the proposal is beyond the scale considered reasonable for an OFGU and is not consistent with the policies of the Provincial Planning Statement and does not maintain the intent and purpose of the Official Plan regarding permitted uses in prime agricultural areas.

DISCUSSION

Background

APPLICANTS/OWNERS: Matthew and Jacklynn Bowcott
806012 Oxford Road 29, Innerkip, ON N0J 1M0

AGENT: Zelinka Priamo Ltd. (Danieli Sikelero Elsenbruch)
318 Wellington Road, London, ON N6C 4P4

LOCATION:

The subject lands are described as Part Lot 6, Concession 6, as in 503194, Except Parts 8, 9, 10, 11, Registered Plan 41R-3091, S/T BD9457, in the Township of Blandford-Blenheim. The lands are located on the south side of Oxford Road 29 and the east side of Blandford Road and are municipally known as 806012 Oxford Road 29.

COUNTY OF OXFORD OFFICIAL PLAN:

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| Schedule "B-1" | Township of Blandford-Blenheim Land Use Plan | Agricultural Reserve and Environmental Protection |
| Schedule "C-1" | County of Oxford Environmental Features Plan | Provincially Significant Wetlands |

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| Schedule "C-2" | County of Oxford Development Constraints Plan | Unstable Soil |
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TOWNSHIP OF BLANDFORD-BLENHEIM ZONING BYLAW 1360-2002:

Existing Zoning: 'General Agricultural Zone (A2)'

Proposed Zoning: 'Special General Agricultural Zone (A2-sp)'

PROPOSAL:

For Council's information, the subject applications were originally considered at the October 1, 2025 Township Council meeting. At the October 1, 2025 meeting, Council heard from a number of residents who expressed concerns with the proposal, including but not limited to noise, pollution, and traffic. Council also directed questions of their own towards the applicants, their agent, and their technical expert as well. During the October 1, 2025 meeting, Township Council ultimately voted to defer the applications until a later date to allow the applicants an opportunity to take the concerns heard into consideration and for Township Council to consider the information presented at the meeting.

Following consideration of their options and further discussion with Planning staff, the agent on the applications have advised that the applicants wish to continue with their proposal as originally presented on October 1, 2025. The applicants' agent has provided a letter to provide additional information on the project. A copy of the letter has been attached to Staff Report CP 2026-10 for Council's consideration.

The applicants have submitted Official Plan Amendment and Zone Change Applications that propose to permit an animal crematorium as an on-farm diversified use (OFDU). According to the information provided, the development that the applicants are proposing would include an approximately 929 m² (10,000 ft²) crematorium building, a parking lot accommodating 24 parking spaces, an outdoor garden area, and a new driveway accessing Blandford Road. The crematorium building would contain a loading area located at the rear (east side) of the building. A 3 m (9.8 ft) landscaped buffer is proposed around the crematorium.

The proposal includes four emission stacks that would be connected to the incinerators within the facility. The stacks would project 5 m (16.4 ft) above the peak of the crematorium building, which is proposed to be 6.7 m (21.9 ft). Each stack would contain emission controls that are monitored. In addition, it shall be noted that the applicants are required to obtain an Environmental Compliance Approval (ECA) from the Ministry of the Environment, Conservation, and Parks (MECP) prior to being permitted to operate. The purpose of the ECA process is to ensure that the business will comply with provincial standards in terms of emissions and discharges related to air, noise, waste, and sewage. The agent for the applicants has advised that an ECA application was submitted to the MECP on October 20, 2025. Staff note that the ECA application was posted on the Environmental Registry of Ontario on December 1, 2025 and the 45-day commenting period closes on January 15, 2026.

The applicants have advised that the crematorium is intended to be used for equine and 'companion animals,' which would generally consist of small animals. The applicants have also advised that they could offer services for the cremation of wild animals to support local authorities, if needed. Small animal euthanasia is not anticipated to occur on-site. Euthanasia services for equine may be offered on-site as one of the applicants maintains the appropriate licence to do so.

The proposed operating hours of the business would be a standard 8:00 am – 5:00 pm schedule. The applicants have advised that visitation from the public would be limited and by appointment only. Depending on the workload, employees at the business will range from six to 12 individuals in various part-time and full-time roles. This number includes drivers of vehicles that the business would use to transport animal remains. The vehicles would leave in the morning and return in the afternoon according to the agent.

The subject lands are approximately 31.8 ha (78.7 ac) in size and contain a building cluster on the north side of the lands, more than 200 m (656 ft) from the location of the proposed animal crematorium. The building cluster contains a single detached dwelling (circ. 2012), a pool house, a pool, and a barn. The remainder of the lands are utilized for cash-cropping purposes and are rented out to a farmer who does not reside on-site.

The subject lands contain an area of significant woodlands, non-provincially significant wetlands, Provincially Significant Wetlands (PSW), and areas to the south and west of the proposed animal crematorium that are regulated by both the Upper Thames River Conservation Authority (UTRCA) and the Grand River Conservation Authority (GRCA).

Surrounding land uses are predominantly agricultural in nature in all directions of the subject lands. In addition to the agricultural uses, there is a recreational use (Innerkip Highlands Golf Club) to the west, non-farm rural residential uses to the north and west, and an animal kennel to the south of the subject lands. The subject lands are located approximately 560 m (1,837.2 ft) from the nearest residential subdivision, which is Elisabeth Street located to the east of the Village of Innerkip.

Plate 1, Location Map and Existing Zoning, shows the location of the subject lands and the existing zoning in the immediate vicinity.

Plate 2, Aerial Map (2020) with Existing Zoning, provides an aerial view of the subject lands and surrounding uses, as they existed in Spring 2020.

Plate 3, Official Plan Designation Map, shows the Official Plan designations of the subject lands and surrounding lands.

Plate 4, Applicants' Sketch, identifies the location of the proposed animal crematorium, parking area, outdoor garden area, and driveway.

Plate 5, Applicants' Rendering, shows the intended design of the animal crematorium building.

Application Review

2024 Provincial Planning Statement

The 2024 Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. Under Section 3 of the Planning Act, where a municipality is exercising its authority affecting a planning matter, such decisions shall be consistent with all policy statements issued under the Act. The policies of the PPS represent minimum standards and planning authorities, and other decision makers may go beyond these minimum standards to address matters of local importance, unless doing so would conflict with

any PPS policy. The following outlines the key PPS policies that have been considered but is not intended to be an exhaustive list.

Direction for rural areas in municipalities are found in Section 2.5 of the PPS. Rural areas are comprised of rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas. In Oxford County, all lands located outside of designated settlement areas are considered to be a prime agriculture area, with the applicable policies for such areas primarily contained in Section 4.3. of the PPS.

Section 4.3 of the PPS directs that planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity of the 'agri-food network' (i.e. elements important to the viability of the agri-food sector such as agricultural operations and primary processing, infrastructure, agricultural services, farm markets, distributors etc.). Further, that prime agricultural areas shall be designated and protected for long term agricultural use.

The PPS defines agricultural uses to mean the growing of crops, including nursery, biomass and horticulture crops, as well as the raising of livestock and animals for food, fur or fibre including poultry and fish, apiaries, agro-forestry, maple syrup production and associated on-farm buildings and structures, including accommodation for full-time farm labour when the size and nature of the operation require additional employment.

Section 4.3.2 (Permitted Uses) of the PPS indicates that permitted uses and activities are: agricultural uses, agriculture-related uses, and on-farm diversified uses. Permitted uses within prime agricultural areas shall be compatible with and shall not hinder surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.

The PPS provides definitions for both agriculture-related use and on-farm diversified use:

Agriculture-related uses: means those farm-related commercial and farm-related industrial uses that are directly related to farm operations in the area, support agriculture, benefit from being in close proximity to farm operations, and provide direct products and/or services to farm operations as a primary activity.

On-farm diversified uses: means uses that are secondary to the principal agricultural use of the property and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, uses that produce value-added agricultural products, and electricity generation facilities and transmission systems, and energy storage systems.

Section 4.3.5 (Non-Agricultural Uses in Prime Agricultural Areas) of the PPS directs that 'non-agricultural uses' in prime agricultural areas may only be permitted for the extraction of minerals, petroleum resources and mineral aggregate resources or limited non-residential uses provided that:

- the land does not comprise a specialty crop area;
- the proposed use complies with MDS;
- there is an identified need for the land to accommodate the proposed use; and
- alternative locations have been evaluated and there are no reasonable alternative locations that avoid prime agricultural areas or are on lower priority agricultural land.

Further, impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided and, where avoidance is not possible, minimized, and mitigated as determined through an agricultural impact assessment.

With respect to the above noted reference to Provincial guidance in 4.3.2 of the PPS, the province has published a document entitled 'Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas' which provides further detail and direction on appropriate types of 'agriculture-related uses' and 'on-farm diversified uses' and associated review criteria, in accordance with the PPS policies. The document is also referred to as Publication 851.

The document contains guidance for agriculture-related uses, being farm-related commercial and/or industrial uses, which may include retailing of agriculture-related products, livestock assembly yards, and farm equipment repair shops, if they meet all the PPS criteria for such uses.

The review criteria for on-farm diversified uses indicate that they shall be located on a farm that is actively in agricultural use and be secondary to the principal agricultural use of the lands, be limited in area, and be compatible with and not hinder surrounding agricultural operations.

The general intent of the limited in area criterion is to minimize the agricultural land taken out of production if any, ensure agriculture remains the main land use, and limit off-site impacts (e.g. traffic and changes to the rural character of the lands) to ensure compatibility with surrounding agricultural operations. The approach to the limited in area criterion is intended to achieve a balance between farmland protection and economic opportunities for farmers, improve consistency in approach, and provide flexibility as such uses and owners change.

The guidelines indicate that the "limited in area" criterion should be based on the total area of the farmlands occupied by the on-farm diversified use (i.e. buildings, outdoor storage, landscaped areas, well and septic systems, parking, new driveways etc.) and that such area does not exceed 2% of the lot area. Municipalities may further scope the scale of on-farm diversified uses by limiting the number or place of residence of employees, number of businesses, percentage of products sold that are produced on the farm, the floor area of buildings and outdoor storage.

The guidelines indicate that, if the area of an on-farm diversified use exceeds these recommended thresholds, consideration should be given to the non-agricultural use policies and, further, that on-farm diversified uses that are proposed to grow beyond these limits, either incrementally or otherwise, are not supported.

For further clarity, Section 2.3.3 of the guideline document sets out various uses that would typically not be considered OFDUs, including:

- large-scale equipment or vehicle dealerships, hotels, landscape businesses, manufacturing plants, trucking yards
- uses with high water and sewage needs and/or that generate significant traffic, such as large food processors, distribution centres, full-scale restaurants, banquet halls
- large-scale recurring events with permanent structures
- institutional uses (e.g., churches, schools, nursing homes, cemeteries)
- large-scale recreational facilities such as golf courses, soccer fields, ball diamonds or arenas

Finally, the guidelines indicate that, since the PPS requires settlement areas to be the focus of growth and development, large-scale industrial and commercial buildings that are more appropriate to locate in settlement areas are not permitted in prime agricultural areas and, as

such, recommends that municipalities cap the gross floor area of buildings for on-farm diversified uses at a scale appropriate to prime agricultural areas.

Official Plan

The subject lands are located within the Agricultural Reserve and Environmental Protection designations according to the Township of Blandford-Blenheim Land Use Plan, as contained in the Official Plan. The Environmental Protection designation represents natural heritage features, such as wetlands and woodlands. The proposed animal crematorium would not be located within the Environmental Protection designated lands. The policies of the Agricultural Reserve designation permit a wide range of agricultural uses and farm buildings and structures necessary to the farming operation, including accessory residential uses required for the farm. Agriculture-related uses and secondary uses, such as on-farm diversified uses (OFDUs) and home occupations, may also be permitted, if they comply with all applicable review criteria.

The County, as part of broader agricultural policy updates recently approved by the Province (i.e. in early 2024), has established comprehensive, locally tailored, Official Plan policies and criteria for such uses to further clarify and expand upon the PPS policies and guidelines for such uses. As such, the review criteria for permitted uses in prime agricultural areas specified in these policies serve as the municipal approach, as set out in municipal planning documents, that achieves the same objective as provincial guidance with respect to such uses, as permitted by the PPS.

Section 3.1.4.3 speaks to Secondary Uses, which are comprised of on-farm diversified uses and rural home occupations, together with agriculture-related uses, are intended to provide opportunities to strengthen and diversify the rural economy, by allowing for the establishment of businesses and services that support or improve agriculture in the area, supplement and diversify farm incomes, and/or provide home based employment opportunities for farms and other rural residents (i.e. home occupations on rural residential lots). Such uses must be compatible with and not hinder agricultural operations, be appropriate for rural services, not undermine or conflict with the planned function of rural settlements and meet various other development criteria.

Section 3.1.4.3.2 of the Official Plan indicates that OFDUs are intended to provide reasonable opportunities for farmers to diversify their farming operation and/or supplement their income from farming, by allowing for certain small-scale business activities to be established as a secondary use on their farm. The policies further direct that such uses may be permitted on an agricultural lot in accordance with various policy criteria, including limitations on the type, size, scale, and area of such uses, primarily to ensure such uses are:

- clearly secondary to the principal agricultural operation on the lot and limited in area;
- are compatible with, and do not hinder, surrounding agricultural operations;
- protect prime agricultural areas for the long term;
- are appropriate for rural infrastructure and public services; and
- do not undermine or conflict with the planned function of settlements.

Generally, the policies contained in the Official Plan direct that OFDUs will only be permitted on an agricultural lot that is being actively farmed and must be clearly secondary to the agricultural operation on the lot in terms of size, scale, and importance. The policies contained in the Official Plan permit the following uses as an OFDU, provided they meet all applicable policy criteria:

- A rural home industry;
- A value-added agricultural facility serving a number of local area farms;
- A value retaining facility;

- A farm-related tourism use;
- A smaller scale agriculture-related use;
- A farm winery; or
- A ground-mounted solar facility.

Additionally, the Official Plan policies specifically identify the following uses that shall not be permitted as an on-farm diversified use:

- Retail uses, office, medical/dental clinics and restaurants;
- Residential uses or accommodation, except for limited, short-term accommodation, including farm vacation rental or bed and breakfast;
- Institutional uses;
- Recreational uses and special event facilities;
- Large scale commercial and industrial uses; and
- Other uses that may attract large numbers of customers or other people, generate significant traffic or not otherwise be appropriate for rural infrastructure or services, create compatibility or enforcement issues, undermine or conflict with the planned function of rural settlements, or otherwise not be consistent with the applicable policies of the Plan.

Wholesaling or retailing are not permitted, except where it is clearly ancillary to the permitted OFDU and limited to small portion of the total gross floor area, the goods or merchandise offered for sale are produced, processed or fabricated on the farm lot, or it is restricted to the sale of farm inputs (e.g. feed, seeds, or fertilizer) primarily to farm operations in the area.

The area used and/or occupied by an OFDU (including buildings, areas for loading and unloading product, driveways and parking, well and septic systems etc.) will be limited to the minimum area required for the use and will not exceed 2% of the total lot area, to a maximum of 0.8 ha (2 acres).

The policies state that the maximum gross floor area of all buildings and/or structures used for the purposes of an OFDU shall be regulated through the provisions of the Township Zoning By-law, provided that the cumulative gross floor area of all buildings and/or structures used or occupied by an OFDU shall not exceed 557 m² (6,000 ft²), except for limited, minor exceptions as set out in the policies. Further, proposals for such uses shall include a detailed description of the proposed use and be accompanied by a detailed site plan and such uses shall generally be subject to site plan control.

In addition to the foregoing, the OFDU shall directly involve the farmer living on the same lot as the use and may also involve any other permanent residents on the lot, and up to two employees who do not reside on the lot. A limited number of additional seasonal employees may be permitted for a farm-related tourism use.

Concerning on-site services for OFDUs, existing or proposed individual on-site water services and individual on-site sewage services shall be demonstrated to be adequate or will be made adequate to serve the proposed OFDU and shall be in accordance with the requirements of the County and Area Municipality, including the applicable policies of Sections 3.2.7.2, Water Quality and Quantity and 5.5, County Servicing Policy.

OFDUs that require individual on-site sewage services that have a design capacity in excess of 10,000 litres per day shall generally not be permitted. On-farm diversified uses must also be appropriate for other rural infrastructure and public services (paramedics, fire, etc.).

Proposals for new or expanding OFDUs which would exceed the number of employees, gross floor area, or site area restrictions will not be permitted unless they comply with the agriculture-related use policies. Reasonable exceptions to the gross floor area and/or number of employees may be considered on site specific basis for a value retaining facility, value added agricultural facility, and/or smaller agriculture-related use, where Area Council is satisfied that such use could not reasonably be located within a rural settlement. Proposal that cannot comply with the agriculture-related use policies (Section 3.1.4.3.3) shall be directed to be located, or relocate, in a settlement or must comply with the applicable policies for non-agricultural uses.

Section 3.1.4.3.3 considers the objectives and criteria for agriculture-related uses within the Agricultural Reserve designation. The intent of the policies is to:

- ensure that all agriculture-related uses:
 - are directly related to farm operations in the area,
 - require a location in close proximity to those farm operations,
 - support agriculture, and
 - provide direct products and/or services to farm operations as their primary activity;
- minimize the amount of agricultural land which is developed for agriculture-related uses;
- ensure that new agriculture-related uses are directed to rural settlements wherever feasible to support the planned employment and/or service function of the settlements in the County; and
- ensure that agriculture-related uses are compatible with and do not hinder surrounding agricultural operations and other nearby land uses.

The Official Plan policies outline various uses that shall not be permitted as agriculture-related uses:

- Retail uses, offices, and restaurants, except where explicitly permitted by the Official Plan policies;
- Residential uses or accommodation;
- Institutional uses;
- Recreational uses;
- Banquet halls and special event facilities;
- Mechanics shops, automobile and recreational vehicle dealerships, distilleries, trucking operations, wrecking yards, contractors' yard, landscaper business, well drillers, excavators, building suppliers and other general commercial and industrial uses; and
- Other uses that may attract large numbers of customers or other people, generate significant traffic or not otherwise be appropriate for rural infrastructure or services, create compatibility or enforcement issues, undermine or conflict with the planned function of rural settlements, or otherwise not be consistent with the applicable policies of the Plan.

Further, agriculture-related uses shall not undermine or conflict with the planned employment and/or service functions of settlements in the County. As such, the proponent is required to demonstrate that the proposed agriculture-related use is not suitable for, and/or cannot reasonably be accommodated within a settlement.

According to Section 3.1.5, it is an objective of the Official Plan to only permit new non-agricultural uses where such uses do not conflict with the 'Goal for Agricultural Policies', as set out in Section 3.1.1, to preserve and protect prime agricultural areas for long term viable agricultural use and avoid or minimize potential impacts on agricultural operations, and direct non-agricultural uses to settlements wherever possible.

Non-agricultural uses include commercial, industrial, institutional, infrastructure, public works yards, recreational, and residential uses that are not directly related to, or supportive of agriculture. Within the Agricultural designation, the use of prime agricultural land for agricultural, mineral, petroleum and environmental resources will be given a higher priority in land use decision making than its use for non-agricultural uses.

To maintain the agricultural land resource for agriculture and related uses, and ensure new commercial, industrial and institutional uses develop on an appropriate level of services and are directed to settlements to support their planned service and employment functions, new non-agricultural commercial, industrial and institutional uses will not be permitted within the Agricultural Reserve, except in accordance with the policies of Section 3.1.7.2.

Section 3.1.7.2 directs that proposals to amend the Official Plan to permit the establishment of new non-agricultural uses in the Agricultural Reserve must provide compelling evidence to demonstrate that the proposed non-agricultural use cannot be located within a settlement and that the following considerations have been addressed:

- Justification analysis which shows that:
 - there is a demonstrated need within the planning period for additional land to be removed from agricultural production and re-designated for the proposed use, given the nature and capacity of undeveloped lands within settlements and/or within other appropriate land use designations;
 - nature of the proposal and whether the use requires special locational requirements or physical features that are only available in prime agricultural areas;
 - the amount of land proposed for the new development is the minimum required for the immediate needs of the proposed use; and,
- Agricultural impact analysis, which demonstrates:
 - the lands do not comprise a specialty crop area;
 - there are no reasonable alternatives which avoid prime agricultural areas;
 - there are no reasonable alternatives on lands with lesser agricultural capability or on lands left less suitable for agriculture by existing or past development;
 - MDS I is satisfied; and,
 - Impacts from the new use on nearby agricultural operations are mitigated to the extent possible.
- The level of servicing planned or available is consistent with the servicing hierarchy established in Section 5.5.3 of this Plan for individual on-site water and individual on-site sewage services.
- The proposed use shall be compatible with and not hinder surrounding agricultural operations and nearby land uses.
- The proposed use shall not create traffic hazards, and the road infrastructure shall be capable of accommodating the new use or expansion.
- The proposal is consistent with Environmental Resource Policies and Cultural Heritage Policies.
- The proposal will not conflict with Resource Extraction Policies.
- The proposal is acceptable regarding the ability to achieve the Goal for Agricultural Policies as set out in Section 3.1.1, the precedent to be established for other sites within the County and the ability to implement planned land uses in the vicinity.

The subject lands are currently zoned 'General Agricultural Zone (A2)' according to the Township of Blandford-Blenheim Zoning By-law, which permits a wide range of agricultural uses, including farm buildings and an accessory dwelling, and requires a minimum lot area of 30 ha (74.1 ac) and a minimum lot frontage of 100 m (328.1 ft). The maximum height for buildings within the A2 zone is 15 m (49.2 ft).

The Township of Blandford-Blenheim Zoning By-law does not specifically list an animal crematorium in Table 5.18.2.1 – Parking Standards. For proposed uses that are not specifically listed within the parking standard table of the Zoning By-law a calculation rate of 1 parking space per 40 m² (430.6 ft²) is applied. At a size of 929 m² (10,000 ft²) the parking calculation would result in the need for 23.3 parking spaces, rounding up to 24 parking spaces. For situations where the required parking spaces is between 13 and 100 spaces, 4% of required parking spaces shall be accessible spaces. The applicants are proposing 24 parking spaces, including two accessible parking spaces.

Agency Comments

The Township Chief Building Official has indicated that any detached structures over 15 m² (161.4 ft²) will require building permits as well as septic permits for any plumbing fixtures.

The Oxford County Public Works Department, the Township Drainage Superintendent, the Township Director of Protective Services, the Upper Thames River Conservation Authority (UTRCA), the Grand River Conservation Authority (GRCA), Southwestern Public Health, and Canada Post have indicated no concerns with the proposal.

Public Consultation

In accordance with the requirements of the Planning Act, notice of complete application regarding this proposal was provided to surrounding landowners on July 4, 2025, and notice of public meeting was issued on September 11, 2025 for the first public meeting. A notice of public meeting for the second public meeting was issued on December 23, 2025. As of the date of this report, 13 letters of concern have been received from members of the general public. An updated petition against the proposal has also been submitted containing 290 signatures. Eight letters of support from members of the general public and Rural Oxford Economic Development have also been received. Copies of each letter and the petition have been attached to Report CP 2026-10 for Council's consideration.

Planning Analysis

2024 Provincial Planning Statement

Section 2.3 of the PPS directs that prime agricultural areas shall be protected for long-term use for agriculture. Permitted uses and activities within a prime agricultural area include agricultural uses, agriculture-related uses, and on-farm diversified uses.

Planning staff have assessed the proposed animal crematorium in accordance with the PPS policies and provincial guidelines pertaining to permitted uses in prime agricultural areas. The subject lands do not comprise a specialty crop area as defined by the PPS but are actively farmed and the majority of lands are located within a prime agricultural area consisting of Class 2 type soil based on the Canada Land Inventory (CLI). In consultation with the Township Chief Building Official (CBO) it was determined that the proposed animal crematorium would be viewed similarly as a deadstock handling facility in terms of Minimum Distance Separation (MDS) requirements.

In accordance with The Minimum Distance Separation (MDS) Document provided by the Province of Ontario (otherwise known as Publication 853) deadstock handling facilities are exempt from MDS I and MDS II regulations.

The PPS policies pertaining to OFDUs require, along with meeting other criteria, that such uses be secondary to the principal agricultural use and limited in area in order to minimize the amount of land taken out of agricultural production, ensure agriculture remains the main land use, and limit off-site impacts. The related provincial guidance indicates that the area required for the OFDU shall include all land occupied by, or no longer available for agricultural production as a result of, the OFDU, including buildings, outdoor storage, landscaped areas, private services, and parking. However, it is noted that, as permitted by the PPS, the County of Oxford Official Plan sets out more specific, locally developed and Provincially approved, size/area and other scale criteria for such uses, which are reviewed below.

Based on the site plan and information submitted by the applicants, the proposed site area associated with the animal crematorium (i.e. buildings, parking, landscaped areas etc.) is approximately 0.96 ha (2.37 ac), which equates to approximately 3% of the total lot area. This would exceed both the recommended maximum site area criteria set out for such uses in the provincial guidance document (i.e. 2% of lot area to a maximum of 1 ha), as well as the locally established maximum site area criteria for such uses set out in the Official Plan (i.e. 2% of lot area to a maximum of 0.8 ha). Further, other scale related aspects of the animal crematorium (e.g. building size, number of employees) are beyond the scale intended for an OFDU by provincial policy and guidelines, as more specifically addressed by the locally developed and Provincially approved Official Plan criteria. Staff also have concerns as to whether agriculture would remain the principal use of the property and to what extent the landowners are involved in the farm operation/farming.

The definition and policies for agriculture-related uses in the PPS indicate that such uses are farm-related commercial and farm-related industrial uses that are directly related to farm operations in the area, support agriculture, benefit from being in close proximity to farm operations, and provide direct products and/or services to farm operations as a primary activity.

Considering the overall nature and scale of the proposed animal crematorium, it is the opinion of Planning staff that the use is not limited in scale, could successfully operate within a settlement area, and would not meet the applicable criteria for an on-farm diversified use or agriculture-related use, as set out in the PPS and associated Provincial guidelines and locally developed criteria. As such, Planning staff do not consider the proposal to be a permitted use within a prime agricultural area.

Official Plan

Staff have evaluated the proposal in accordance with the review criteria in the Official Plan for OFDUs. The intent of the Official Plan policies for OFDUs is to ensure that the use is clearly secondary to the principal agricultural operation, compatible with and does not hinder surrounding agricultural uses, protects prime agricultural areas, is appropriate for rural infrastructure, and does not undermine or conflict with the planned function of settlements.

The Official Plan outlines basic locational requirements for OFDUs, including the requirement for an OFDU to be located within established building clusters and to make use of the existing driveway except where it is clearly not feasible and/or appropriate to do so. In this case, the animal crematorium is proposed to be located on agricultural lands and away from the established building cluster on-site. The existing building cluster is located on the north side of the subject

lands with access to Oxford Road 29 and contains a single detached dwelling and various outbuildings. The animal crematorium is proposed to be located on the west side of the subject lands, more than 200 m (656 ft) from the building cluster, and would maintain a separate access to Blandford Road. In the opinion of staff, compelling rationale as to why it is not feasible or appropriate for the OFDU to be located within the existing building cluster has not been provided.

In keeping with both provincial guidelines and local policy objectives, the Official Plan policies prohibit 'large-scale commercial and industrial uses' as OFDUs. As such, given the scale of the animal crematorium, it is the opinion of staff that such a proposed use is not considered to be an OFDU. Even other uses that may be permitted as OFDUs (i.e. are not prohibited), can only be considered if they meet all applicable policy criteria, including various specific and intentional limitations on size and scale (e.g. maximum site area, building size, number of employees, patrons, and guests etc.). For comparison purposes, this proposal has also been reviewed in relation to a number of these criteria, as follows.

Based on the site plan and information submitted by the applicants, the total area associated with the proposed animal crematorium is approximately 0.96 ha (2.37 ac) or 3% of the total parcel size, which is exceeds the maximum of 0.8 ha (2 ac), or 2% of total lot area, permitted by the Official Plan. Further, the gross floor area of the animal crematorium is approximately 929 m² (10,000 ft²), which exceeds the permitted maximum gross floor area for an OFDU of 557 m² (6,000 ft²) by 372 m² (4,000 ft²), or approximately 66%.

The Official Plan policies also state that the OFDU shall directly involve the owner of the farm living on the same lot as the OFDU and may also involve any other permanent residents on the lot and up to two employees who do not reside on the lot. A farm owner is defined in the Official Plan as:

"An individual, partnership, or corporation which:

- Owns, is employed on, and manages an agricultural operation consisting of one or more agricultural lots;*
- Earns a majority of their income from farming (the scale of the agricultural operation should be capable of generating reasonable operating profit under "normal" economic conditions);*
- Spends a majority of their workday in the day-to-day operation of the farm on a full-time, year-round or extended seasonal basis;*
- Demonstrates a continuing commitment to the farm operation and long term farming, such as through sustainable farming practices, on-going farm maintenance and improvement (i.e., drainage, erosion control, soil improvement, fencing etc.), and direct investment in equipment, buildings, and crops; and,*
- Must have a valid Farm Business Registration Number."*

In this case, it is the understanding of staff that the owners of the farm do not have a valid Farm Business Registration Number and rent out the lands for cash cropping to an off-site farmer. Given that the owners of the farm are not actively involved with farming and do not earn the majority of their income from farming it is the opinion of staff that the owners would not be considered a farm owner under the existing definition in the Official Plan.

Additionally, the applicants are proposing that the number of employees would range from six and 12 individuals. This would be a combination of full-time and part-time employees and would include the owner of the subject lands. This proposed number of employees would exceed the permitted maximum of two off-site employees in addition to any employees who reside on-site. The applicants have advised that the nature of the animal crematorium will require more than two

employees. In the opinion of staff, the need for considerably more employees than the permitted two off-site employees reaffirms that the use and scale of the proposed business is better suited for established settlements.

For the above reasons, it is the opinion of Planning staff that the proposed animal crematorium use and the proposed scale are not intended to be permitted as an OFDU. Further, the Official Plan policies specifically state that uses that would exceed the scale restrictions for an OFDU shall not be permitted unless they comply with the agriculture-related use policies. Proposals that cannot meet those policies shall be directed to locate or relocate in a settlement or must comply with the applicable policies for non-agricultural uses.

In this regard, it is also the opinion of staff that the use does not comply with the applicable policies for agriculture-related uses, as it has not been demonstrated that the use is required to be located upon agricultural land and that sufficient land does not currently exist within identified settlements. As such, Planning staff are of the opinion that the proposal to permit an animal crematorium would be considered a non-agricultural use. That said, as the use has been proposed as an OFDU, the applicants have not provided justification (i.e. planning justification, agricultural impact analysis etc.) to address the applicable PPS and OP criteria that would apply to consideration of a non-agricultural use in a prime agricultural area.

In light on the foregoing, Planning staff are of the opinion that the proposed animal crematorium does not meet the definition of an OFDU, as the Official Plan does not permit large-scale commercial and industrial uses as OFDUs. As such, staff are of the opinion that the proposal is not appropriate from a planning perspective and should not be supported.

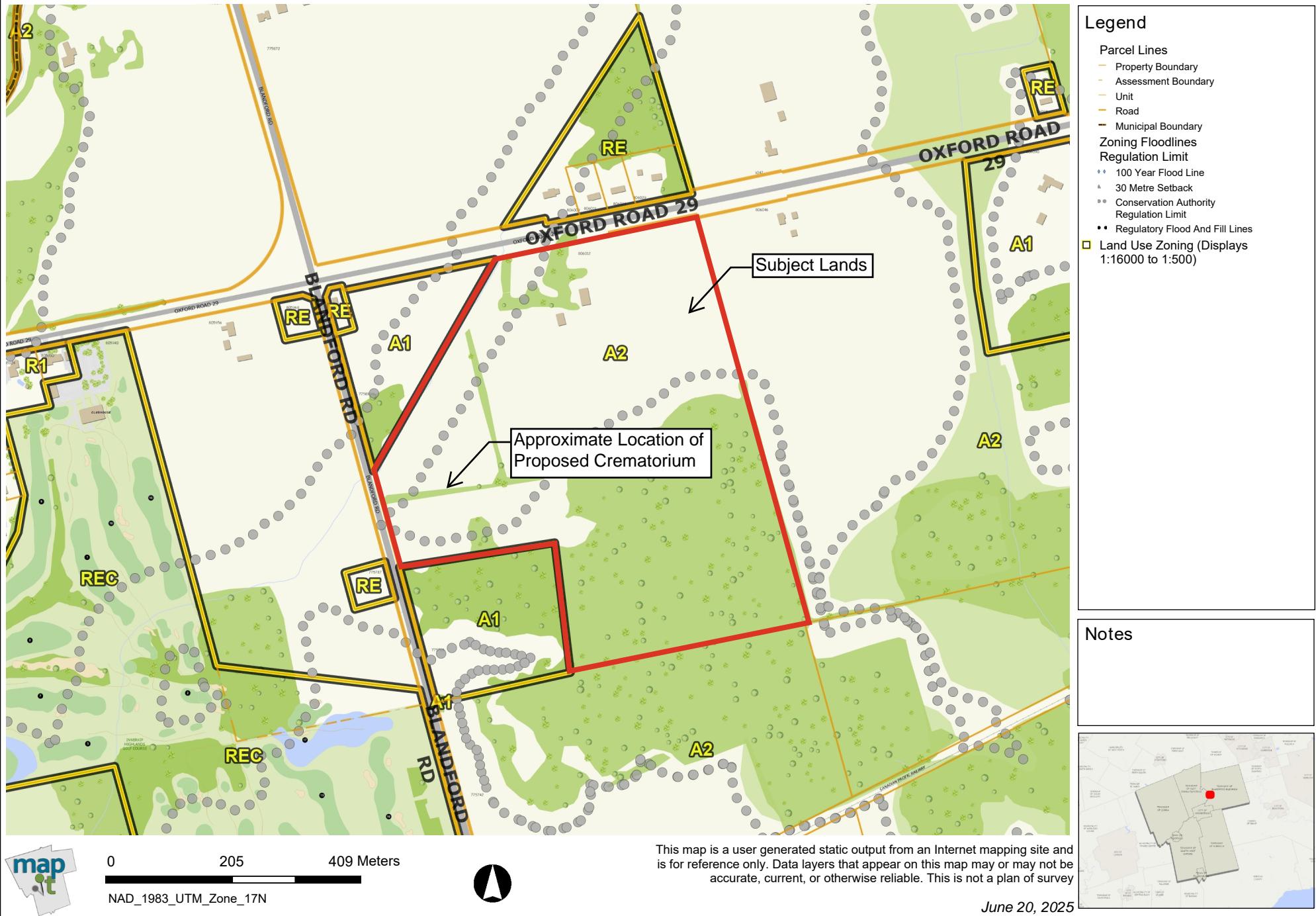
RECOMMENDATIONS

1. That the Council of the Township of Blandford-Blenheim advise County Council that the Township does not support the application for the Official Plan Amendment (File No. OP 25-08-1) submitted by Matthew and Jacklynn Bowcott for the lands legally described as Part Lot 6, Concession 6, as in 503194, Except Parts 8, 9, 10, 11, Registered Plan 41R-3091, S/T BD9457, Township of Blandford-Blenheim to include a site-specific policy to permit an animal crematorium as an on-farm diversified use (OFDU); and,
2. And further that the Council of the Township of Blandford-Blenheim not approve the Zone Change Application (File No. ZN 1-25-05) submitted by Matthew and Jacklynn Bowcott, whereby the lands described as Part Lot 6, Concession 6, as in 503194, Except Parts 8, 9, 10, 11, Registered Plan 41R-3091, S/T BD9457, Township of Blandford-Blenheim, be rezoned from 'General Agricultural Zone (A2)' to 'Special General Agricultural Zone (A2-sp)' to permit an animal crematorium as an on-farm diversified use (OFDU).

SIGNATURES

Authored by: *'Original Signed by'* Dustin Robson, MCIP, RPP
Development Planner

Approved for submission: *'Original Signed by'* Eric Gilbert, MCIP, RPP
Manager of Development Planning

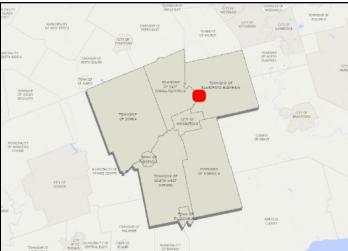


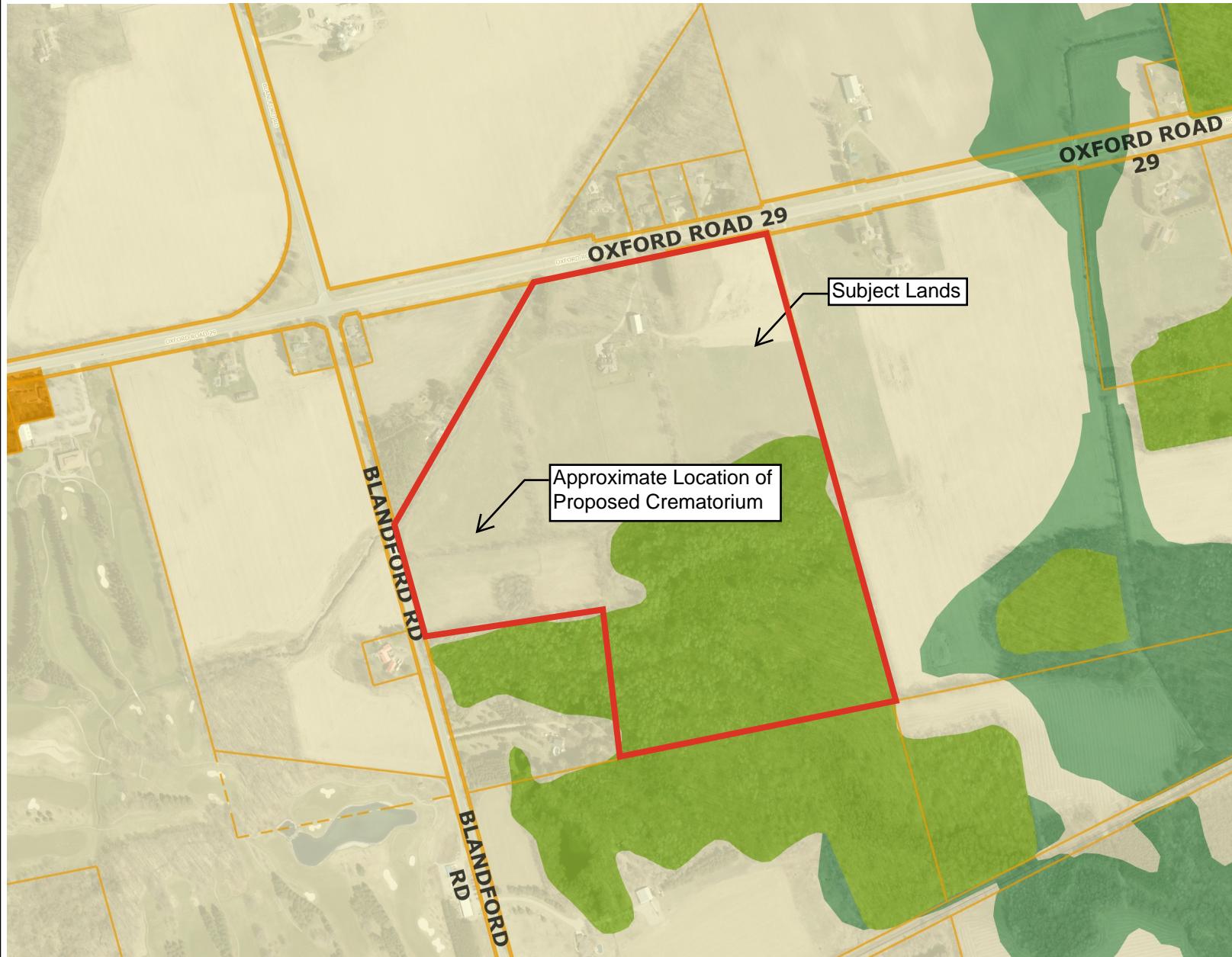


Legend

- Parcel Lines**
 - Property Boundary
 - Assessment Boundary
 - Unit
 - Road
 - Municipal Boundary
- Zoning Floodlines**
- Regulation Limit**
 - 100 Year Flood Line
 - 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)**

Notes





Legend

Parcel Lines

- Property Boundary
- Assessment Boundary
- Unit
- Road
- Municipal Boundary
- 100 Metre Buffer Ingersoll

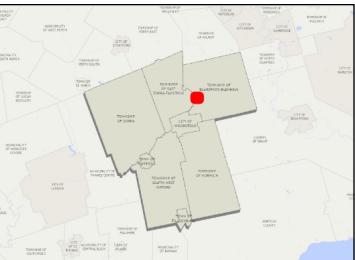
Land Use Designation

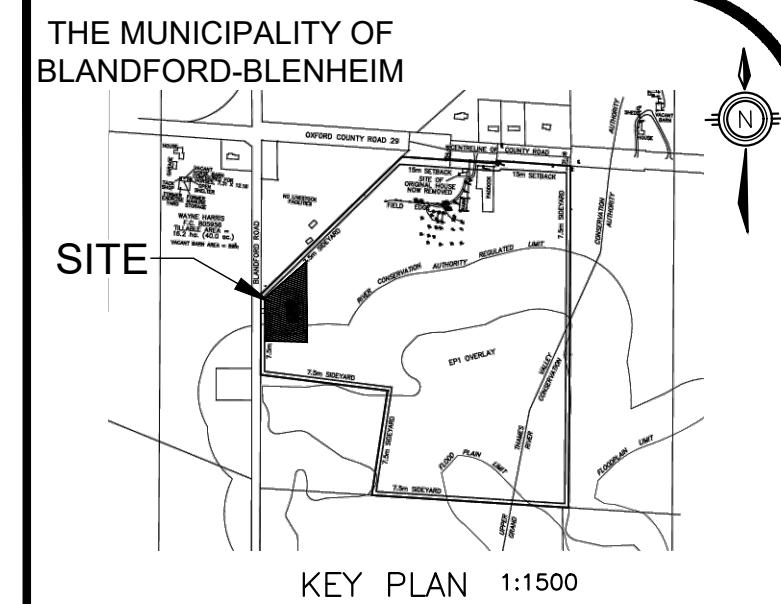
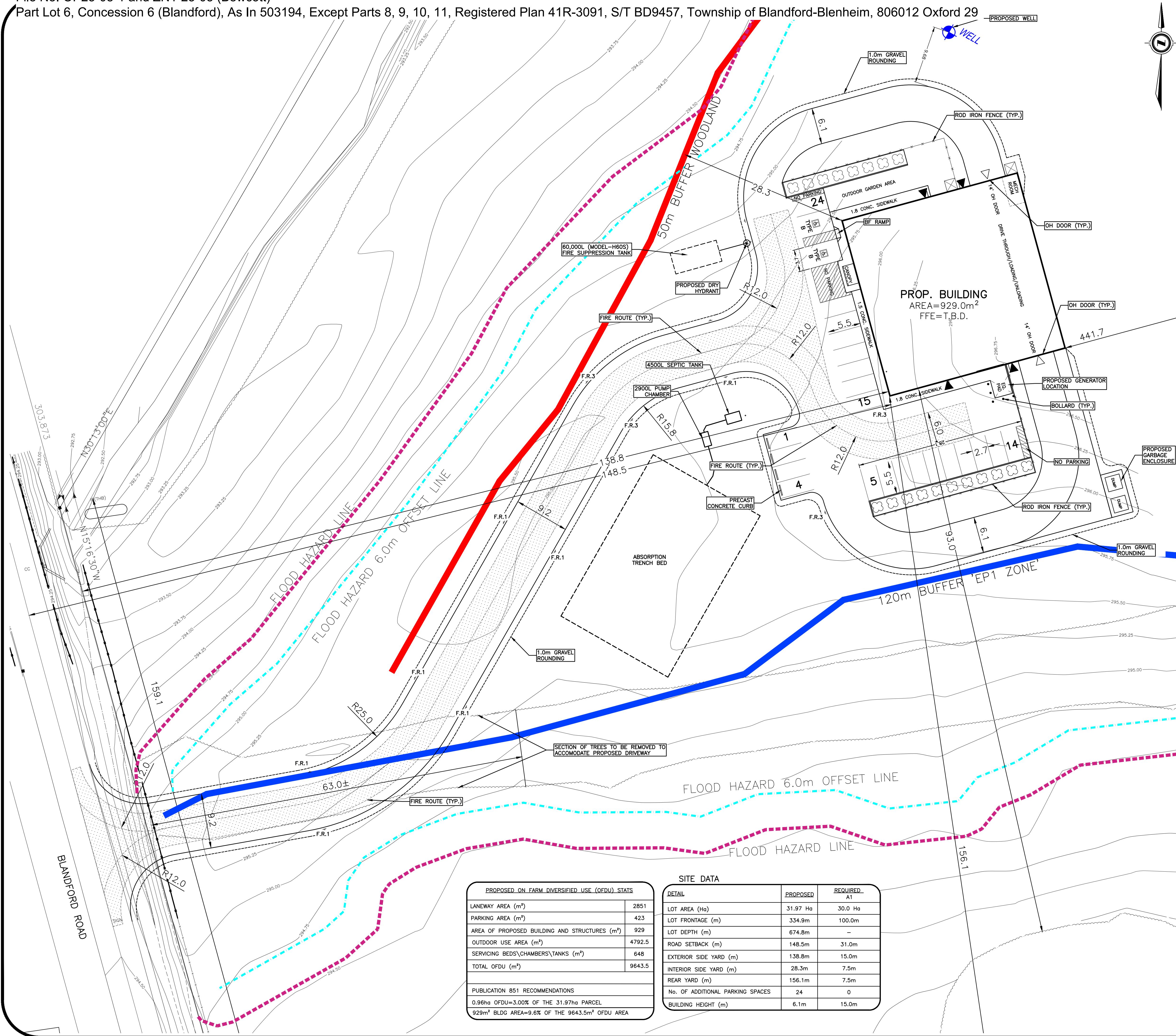
- Residential
- Residential Reserve
- Central Business District
- Entrepreneurial District
- Neighbourhood Shopping Centre
- Service Commercial
- Regional Commercial Node
- Business Park
- Traditional Industrial
- Community Facility
- Open Space
- Environmental Protection
- Future Urban Growth
- Rural Buffer
- Industrial Site Specific Policy Area
- Agricultural Reserve
- Settlement
- County Biosolid Storage Facility
- County Landfill Site
- Quarry Area
- Industrial
- Prime Industrial
- Linear Rural Cluster
- Pedestrian Predominate Area

Notes

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

September 16, 2025





SITE BENCHMARK #1 ELEV. = 294.30m
TYPE: CUT CROSS

LOCATION: CUT CROSS LOCATED ON CONCRETE BOX CULVERT LOCATED ON THE EAST SIDE OF BLANDFORD ROAD. E=525831.1560m, N=4784612.5690m

SITE BENCHMARK #2 ELEV. = 295.020m

TYPE: NAIL IN HYDRO POLE

LOCATION: 80.4m SOUTH OF THE CONCRETE BOX CULVERT, ON THE WEST SIDE OF THE ROAD, E=525839.9530m, N=4784531.1770m

NOTE TO CONTRACTOR :
DO NOT SCALE DRAWINGS.
CONTRACTORS MUST CHECK AND VERIFY ALL DIMENSIONS

AND REPORT ANY DISCREPANCIES TO THE ENGINEER BEFORE PROCEEDING WITH THE WORK.

ALL DRAWINGS REMAIN THE PROPERTY OF THE ENGINEER AND SHALL NOT BE REPRODUCED OR REUSED WITHOUT THE ENGINEER'S WRITTEN PERMISSION.

THE OWNER/ARCHITECT/CONTRACTOR IS ADVISED THAT M.T.E. CONSULTANTS INC. CANNOT CERTIFY ANY COMPONENT OF THE SITE WORKS NOT INSPECTED DURING CONSTRUCTION. IT IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR TO NOTIFY M.T.E. CONSULTANTS INC. PRIOR TO COMMENCEMENT OF CONSTRUCTION TO ARRANGE FOR INSPECTION.

LEGEND

| | | | |
|----|----------------------------|-----|------------|
| 8. | | | |
| 7. | | | |
| 6. | | | |
| 5. | | | |
| 4. | REVISED BUILDING LOCATION | MTE | 2025-04-22 |
| 3. | REVISED BUILDING FOOTPRINT | MTE | 2025-03-06 |
| 2. | FIRST SUBMISSION | MTE | 2024-12-10 |
| 1. | CLIENT REVIEW | MTE | 2024-11-26 |

519-204-6510

OWNER

TRIGON CONSTRUCTION
MANAGEMENT

35 RIDGEWAY CIRCLE WOODSTOCK, ON
PROJECT BLANDFORD RD
ANIMAL CREMATORIAL
BLANDFORD ROAD DRUMBO, ON

10.1007/s00332-010-9000-0

SITE PLAN

10.1007/s00332-010-9000-0

| | |
|-----------------|-------------|
| Project Manager | Project No. |
|-----------------|-------------|

L. SULLIVAN **55715-200**

| | | | |
|-----------|-----|------------|------|
| Design By | JAC | Checked By | AOOS |
| Drawn By | | Checked By | |

| | | | |
|-------------|-----|-------------|-----|
| Drawn By | JAC | Checked By | JJM |
| Surveyed By | | Drawing No. | |

Date Nov. 12/21

| | |
|-------------|-------------|
| Nov. 18/24 | A.I. |
| Scale 1:300 | Clouds 6 |

Page _____ of _____

Plate 5: Applicants' Rendering

File No. OP25-08-1 and ZN1-25-05 (Bowcott)

Part Lot 6, Concession 6 (Blandford), As In 503194, Except Parts 8, 9, 10, 11, Registered Plan 41R-3091, S/T BD9457, Township of Blandford-Blenheim, 806012 Oxford 29



December 23, 2025

sent via email

Mayor Peterson and Council Members
Township of Blandford-Blenheim
47 Wilmot Street South
Drumbo, ON
N0J 1G0

**RE: Additional Information
Official Plan Amendment & Zoning By-law Amendment Applications
Proposed Animal Crematorium
Matthew and Jacklynn Bowcott
806012 Oxford Road 29
Village of Innerkip, Township of Blandford-Blenheim, ON**

Our File: TRG/EZT/25-01

On behalf of Matthew and Jacklynn Bowcott, Zelinka Priamo Ltd. is pleased to provide the following information for your consideration regarding the concurrent Official Plan Amendment ('OPA') and Zoning By-law Amendment ('ZBA') Applications for the lands located at 806012 Oxford Road 29 (the "subject lands"), seeking to permit an "Animal Crematorium" use on the subject lands.

Following careful review and consideration of the comments included within the Staff Report CP 2025-283 dated October 1, 2025, and the comments voiced at the October 1st Statutory Public meeting, we provide the following responses and additional information:

i. **Air Quality and Noise Emissions:** RWDI was retained to conduct an Air Quality Assessment and Noise Assessment, and provided a presentation at the public meeting. RWDI's Assessments concluded that all predicted concentrations of air emissions were below the applicable air quality criteria and all predicted noise levels were below the applicable noise guidelines. Each incinerator unit is equipped with an individual continuous monitoring system for air emissions. If any unit fails to comply with emissions regulations, it will be automatically shut down. Moreover, the proposed "*Animal Crematorium*" will be subject to strict provincial environmental regulations and must obtain an Environmental Compliance Approval (ECA) to authorize its operation on the subject lands.

Please find attached a memorandum from RWDI summarizing the findings of the Air Quality and Noise Assessments, as well as the status of the ECA application (see Annex A).

ii. **Proposed Use:** It continues to be our professional opinion that the proposed "*Animal Crematorium*" is an appropriate additional farm-related use for the subject lands. The proposed development is compatible with and does not hinder

surrounding agricultural operations, supports agricultural operations, benefits from proximity to farm operations, and provides direct services to farms in the area. It is the type of use that is supported and encouraged by provincial land use planning policy in order for Ontario farm owners to provide enhanced services and activities, and additional income, from their landholdings.

It is our professional opinion that the proposed development meets the general intent of the relevant assessment criteria associated with On-Farm Diversified Uses (“OFDU’s”), as per the province’s Publication 851: Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas. As you may know, the same Guidelines speak to other types of uses that would be permitted in Prime Agricultural Areas i.e. “Agricultural” Uses and “Agriculture-Related” Uses; and provides criteria for such uses. The Provincial Planning Statement (PPS) 2024 defines Agriculture-related uses as farm-related commercial and farm-related industrial uses that are directly related to farm operations in the area, support agriculture, benefit from being near farm operations, and provide direct products and/or services to farm operations as a primary activity. It is our opinion that the proposed use could also fall within this use category and would generally align with the relevant criteria, which interestingly does not include any maximum area/building limits. According to Publication 851, an abattoir is a farm-related industrial use that would be an Agriculture-Related Use. During the pre-application consultation process, the Township CBO believed the proposed use would be best defined under the Township ZBL as a “*Dead Stock Removal Operation*” which would operate/function in a similar way to the proposed use and is listed as a permitted use in the Agri-Business (AB) Zone.

For your information, the Municipal Council of Thames Centre approved a Zoning By-law Amendment application to permit an Animal Crematorium as an OFDU on agricultural lands. We have included a copy of that decision for your information (see Annex B).

- iii. **Proposed Location:** To make efficient use of the subject lands, while minimizing the loss of agricultural land, the location of the proposed development was determined in consultation with County staff and UTRCA staff following detailed consideration of existing flooding and erosion hazards, and natural heritage constraints. It was determined that the existing farm building cluster located off Oxford Road 29 does not have available space to accommodate the proposed development. Any alternative location on the property would involve removing cultivated fields. The proposed location was determined to have fewer constraints compared to other potential locations on the subject lands.
- iv. **Proposed project area:** The proposed development is appropriately scaled in relation to the size of the subject lands and project area. The total size of the proposed project area is approximately 0.9ha, which comprises the driveway, parking and maneuvering areas, the building, the septic system and water well, and a 3m buffer zone surrounding the entire project area. The 0.9ha project area meets the provincial guideline threshold of 1.0ha but slightly exceeds the maximum guideline of 2% of the total site area (2.7% is proposed). This is primarily due to the generous 135m (440 ft) setback provided from Blandford Road, as well as the need to avoid natural features and hazards areas. Furthermore, the building size

(i.e. $929m^2 = 9.6\%$ project area) is well below the maximum provincial guideline of 20% of the project area.

- v. **Business Operation:** The proposed development is to operate during commercial hours, not 24 hours a day. It is important to mention that the incinerators cannot operate 24 hours a day because they have to cool down for a certain period of time.
- vi. **Potential Expansion:** There is no opportunity to expand the business because of limitations in gas service and limitations in the project area that cannot encroach on natural features and hazards areas.
- vii. **Transportation:** The proposed development will be accessed from Blandford Road. Associated traffic movements are anticipated to be minimal. All visitors will be received by appointment only. Two pickup vans are expected to operate in the morning and return in the afternoon. The only other traffic anticipated will be staff arriving for work on Blandford Road, which is designated as a “*Township Road*” and is considered capable of accommodating the anticipated volume of traffic, without generating any significant safety or congestion issues.
- viii. **Nutrient Management Strategy:** Correspondence from the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) has been obtained and provided to municipal staff confirming that a nutrient management strategy is not required, as said strategies relate only to proposals for livestock housing and manure storage, which the proposed development is not (see Annex C).

CONCLUSION

It continues to be our professional opinion that the proposed development is consistent with the intent and policies as set forth in the provincial and municipal planning legislation. Moreover, the proposed use provides direct service and support to agricultural operations in the surrounding area while offering a sustainable alternative to traditional animal disposal methods. It also provides an economic contribution to the local economy, providing employment opportunities, having a positive impact on the local agricultural community. As such, the proposed development is considered appropriate and represents good land use planning. **As such, we are hopeful of a positive endorsement from the Council when the application is presented for a formal decision.**

We trust that the information provided in this letter is sufficient for your needs. Please don't hesitate to contact us if any additional information is required for your review.

Yours very truly,

ZELINKA PRIAMO LTD.



Dave Hannam
Partner



Danieli Sikelero Elsenbruch
Planner

Encl.:

Cc: The Client (Via Email)

ANNEX A

MEMORANDUM FROM RWDI



600 Southgate Drive
Guelph ON Canada
N1G 4P6

Tel: +1.519.823.1311
E-mail: solutions@rwdi.com

MEMORANDUM

| | | |
|--------------|--|---|
| DATE: | December 12, 2025 | RWDI Reference No.: 2506459 |
| TO: | Mayor Peterson and Council Members | Township of Blandford-Blenheim 47 Wilmot Street South Drumbo, ON N0J 1G0 |
| CC: | Matt Bowcot Thomas Bailey Danieli Sikelero Elsenbruch | |
| FROM: | Maja Bokara Sarah Pellatt | |
| RE: | Summary of Air Quality and Noise Permitting Work Proposed Animal Crematorium Township of Blandford-Blenheim | |

Dear Mayor Peterson and Council Members,

RWDI was retained by Trigon Construction Management to assist in completing the required air quality and noise studies in support of an Environmental Compliance Approval (ECA) application in accordance with the Ministry of the Environment, Conservation and Parks (MECP) requirements for the proposed Animal Crematorium facility to be located at Blandford Road in Woodstock, Ontario.

This memo provides a summary of completed air quality and noise studies, as well as an update on the current status of the ECA application. The air quality and noise studies concluded that the proposed Animal Crematorium facility demonstrated compliance with the applicable air quality and noise criteria set forth by the MECP.

Air Quality Study

RWDI prepared an Emission Summary and Dispersion Modelling report (ESDM) in support of the ECA application. The ESDM report was prepared in accordance with MECP requirements under Regulation 419/05, following MECP Guidelines A10 and A11.



The ESDM report assessed emissions from all regulated sources at the proposed facility under a reasonable maximum operating scenario. The facility includes four natural gas-fired incinerators, which are expected to operate 8 hours per day for the medium and large size units and 4 hours per day for the small units. As a conservative approach, all units were assumed to be operating simultaneously 24 hours per day, with the exception of the assessment of annual benzo(a)pyrene, where the actual operating hours were considered over the course of an entire year.

Emissions of various contaminants from each incinerator unit were calculated based on published emission factors. The incinerator sources and their respective emissions were entered into the AERMOD dispersion model, and concentrations were predicted over a grid of receptors positioned along the facility's property line and extending a minimum of 5 kilometers from the facility. The dispersion model considered 5 years of meteorological data.

Maximum predicted concentrations from the AERMOD model were compared to air quality criteria set out by the MECP in their Air Contaminants Benchmark List (ACB List). **The concentrations for all contaminants emitted by the proposed Animal Crematorium were below the applicable MECP criteria.**

Noise Study

RWDI prepared an Acoustic Assessment Report (AAR) in support of the ECA application. The AAR was prepared in accordance with MECP guidance in NPC-233 (1995) and the MECP's Guide to Applying for an Environmental Compliance Approval (2012).

The noise study was based on a predictable worst-case operating scenario, whereby all continuous noise sources at the facility were assumed to be operating 24 hours per day, with delivery trucks and generator testing assumed to occur during daytime hours.

Sound levels were determined using engineering calculations, manufacturer's data, and measurements from similar equipment. The sources were entered into the Cadna/A noise propagation model, and noise impacts were predicted at the three closest residential locations. Noise levels were compared to the Class 3 limits, which are representative of a rural agricultural area with little to no road traffic.

The noise model indicated that noise barriers are required for the condensing unit and the emergency generator; **with these noise barriers in place, the noise levels emitted by the proposed Animal Crematorium were below the applicable MECP Class 3 limits.**



Proposed Animal Crematorium
RWDI#2506459
December 12, 2025

ECA Application Status

On October 1st, 2025, Sarah Pellatt attended a Public Meeting in Drumbo, Ontario, to present the results of the RWDI studies to the Blandford-Blenheim Council and members of the public.

The ECA application was submitted to the MECP on October 20, 2025. The ECA application was processed through the MECP pre-screening stage in November 2025 and is now in the queue for the MECP's detailed technical review. The MECP has a 1-year service standard for completing the review of ECA applications, so the ECA is expected to be issued in the fall of 2026.

Yours truly,

A handwritten signature in black ink, appearing to read "Maja Bokara".

Maja Bokara, PGCert, EP
Project Manager
RWDI
Attach.

ANNEX B

COPY OF THE DECISION ON THE ZBA APPLICATION TO PERMIT AN ANIMAL CREMATORIUM ON AGRICULTURAL LANDS IN THAMES CENTRE AND COPY OF THE ENVIRONMENTAL COMPLIANCE APPROVAL FOR THIS SITE



MUNICIPALITY OF THAMES CENTRE

REPORT NO. PDS-002-025

FILE NO. **Z17-24**

TO: Mayor and Members of Council

FROM: A. Kertesz, Planner

MEETING DATE: January 27, 2025

SUBJECT: **Zoning By-law Amendment Application (Z17-24); Jeffrey Eric Bushell and Samantha Lynn Bushell (Applicants); Jeffrey Eric Bushell (Agent); 2470 Cromarty Drive**

RECOMMENDATION:

THAT Application for Zoning By-law Amendment Z17-24 as requested by Jeffrey Bushell and Samantha Bushell to rezone the subject property from the Agricultural (A) Zone to a site-specific Agricultural (A-67) Zone to allow 'small animal crematorium' as a permitted use, in addition to all other uses permitted in the parent Agricultural (A) Zone for lands legally described as Part of Lots 6 to 10 on Plan 158 (geographic Township of North Dorchester), Municipality of Thames Centre be **APPROVED**;

AND THAT the implementing by-law be introduced in the by-law portion of the agenda.

PURPOSE:

The purpose and effect of this Application is to rezone the subject property from the Agricultural (A) Zone to a site-specific Agricultural (A-67) Zone to add 'Small Animal Crematorium' as an additional permitted use on the property.

BACKGROUND:

The subject lands are a 17.14 hectare (42.36 ac) farm located at the northeast corner of Elgin Road (County Road 73) and Cromarty Drive. The lands contain a single detached dwelling, a barn used for boarding horses, and a shed. The lands are serviced by a private well and septic system. According to the Thames Centre Official Plan, the lands are designated Agricultural, Natural Area and Protection Area. The lands are zoned Agricultural (A), Environmental Protection (EP) and Wetland (W) according to the Thames Centre Comprehensive Zoning By-law. The northerly lot line abuts Highway 401, in particular, the Elgin Road Highway 401 east bound on-ramp. The lands contain natural heritage features including significant woodlands recognized by the Middlesex Natural Heritage Systems Study, 2014 (MNHSS) and provincially significant wetlands. A majority of the property is regulated by the Upper Thames River Conservation Authority.

The applicants are seeking to establish a small animal crematorium business to accommodate small farm animals and pets under 200 pounds to operate out of an existing livestock building, being the barn used to board horses, which is otherwise not permitted.

This zoning by-law amendment is being sought as the proposal did not meet the Thames Centre Zoning By-law Agricultural Home Occupation criteria as the criteria does not allow for a home occupation to be located within an agricultural building.

The proposed small animal crematorium would be located within a separate room of the horse barn, having a floor area of 44.59 square metres (480 ft²) in the 388.52 square metre (4182 ft²) horse barn. The crematorium room also contains a kiln which will be used for creating keepsakes and glazed paw prints. A small monitoring station is located in the same general area as the crematorium, in a separate room which contains a computer that monitors the emissions and the functionality of the units. The cremation business would involve the applicants retrieving the animals from local veterinarians and other clients to be brought to the property to be cremated. The applicants have obtained an Environmental Compliance Approval (ECA) from the Ministry of the Environment, Conservation and Parks (MECP) to allow for the natural gas fired pet cremation units and a cremains processor. Surrounding land uses primarily include agricultural uses and natural heritage features. An industrial use being a stone and soil yard is located across from the property on the south side of Cromarty Drive.

ANALYSIS:

Under the Provincial Planning Statement 2024 (PPS), prime agricultural areas are defined as areas where prime agricultural lands predominate, which includes the immediate area including the subject lands. Given that agricultural land is a limited resource, these areas are to be protected according to the province being a matter of provincial interest.

In prime agricultural areas, permitted uses and activities according to the PPS include: agricultural uses, agriculture-related uses and on-farm diversified uses (OFDUs). The County of Middlesex Official Plan permits on-farm diversified uses subject to criteria including the criteria indicated in the provincial guidelines. Staff would like to note, Thames Centre's Official Plan does not currently contain policies that speak directly to OFDUs as it predates the Province's Guidelines document. Staff would like to note, although not currently in effect, the application is in line with the OFDU policies within Official Plan Amendment No. 27, being Thames Centre's Updated Official Plan.

Considering the subject property is a 17.14 hectare (42.36 ac) farm used for field crop cultivation and horse boarding, it contains an agricultural use. With respect to the proposed small animal crematorium, it could be considered as an OFDU provided the evaluation criteria as outlined by the Province has been met. To assist in determining whether the proposed use is OFDU under the PPS, the Ontario Ministry of Agricultural, Food and Agri-business (previously referred to as Ontario Ministry of Agricultural, Food and Rural Affairs (OMAFRA)) released a document in 2016 entitled *The Guidelines on*

Permitted Uses in Ontario's Prime Agricultural Areas. Through that document, all of the following criteria must be met for a use to qualify as an OFDU:

1) Located on a farm.

Applicant's response: The entirety of the proposed use and amendment is located within a farm building.

Staff's comments: The property is used for agricultural purposes including field crop cultivation and the boarding of horses. This criteria has been satisfied.

2) Secondary to the principal agricultural use of the property

Applicant's response: Approximately eleven acres of the property is designated for farming. The applicants rent the field to a farmer for field crop cultivation. The applicant has hopes to share-crop and take over the farming of the property in the future. The proposed diversified use does not inhibit any current agricultural uses on the property or neighbouring properties. It does not interfere with any cropping cycles, drainage or land use. It does not require grading, it does not require any waste water or any emergency services. Upon the request of the building inspector, a firewall in compliance with the OBC was erected and passed inspection.

Staff's comments: The lands will continue to be used for agricultural purposes and staff do not anticipate that the small animal crematorium will interfere with the horse stable as it is located in a separate room and will also not interfere with field crop cultivation. Therefore, the small pet crematorium can be considered secondary to the principal agricultural use of the property. This criteria has been satisfied.

3) Limited in area

Applicant's response: The proposed on-farm diversified use is limited in area and scope. The applicant (Jeffery Bushell) is the only person that operates the cremation units. The applicant's parents maintain the property. The proposed use is confined to an area of 9.14 metres (30 ft) by 6.1 metres (20 ft) and takes up less than 20% of the overall farm building and much less than 1% of the overall property. This proposed use does not reduce the amount of arable land. Since the applicant has installed the burner, he has updated all of the buildings on the property, increased the amount of land being farmed, and increased the number of animals being housed at the farm.

Staff's comments: As noted above, the space within the barn that would contain the cremation units would take up less than 20% of the existing barn. Additionally, staff would like to note there is a small monitoring station space in the same general area of the barn which is required for the crematorium. Staff do not have concerns with size of the crematorium and the monitoring system space as the business would be limited in area and under the maximum size of 2% of

the property. Staff does not have concerns with parking since the business would generally involve the applicant retrieving the animals to bring back to the site, therefore it is not anticipated that there will be much traffic or need for more parking beyond what is already located by the barn for horse boarding and farm parking. Based on the foregoing, this criteria has been satisfied.

4) Includes but is not limited to home occupations, home industries, agri-tourism uses and uses that produce value-added agricultural products

Applicant's response: The proposed use is only to service local farms, local residents and animal hospitals. There is no plan to scale up but only to meet a need in this community. Thorndale Animal hospital, Shaw Road Animal Hospital, and East Middlesex Animal Hospital would like to use the small animal crematorium services as soon as possible and pending approval of this amendment.

Staff's comments: The proposed small animal crematorium can be considered an OFDU being secondary to the main agricultural use of the property and limited in area. This criteria has been satisfied.

5) Shall be compatible with, and shall not hinder, surrounding agricultural operations.

Applicant's response: The applicant has approval of the Ministry of the Environment that the proposed use does not hinder on farm operations or surrounding operations through either noise or air quality.

Staff's comments: The proposed small animal crematorium would be compatible with surrounding agricultural operations and is not anticipated to hinder them given the size, scale, and location of the proposed use as well as the terms of condition requirements of the Ministry of the Environment, Conservation, and Parks' (MECP) Environmental Compliance Approval (ECA) that was obtained by the applicant for the natural gas fired pet cremation units and a cremains processor.

The Thames Centre Official Plan requires that prior to the approval of a zoning by-law amendment, it shall be established to the satisfaction of Council that:

- *Soil and drainage conditions are suitable to permit the proper siting of buildings;*

There are no new buildings or structures proposed to accommodate the proposed use given the existing barn is to be used for the small animal crematorium. The applicant received a building permit for the existing furnace that was installed for the business. Any additional renovations for the proposal may require a building permit.

- *Services and utilities, whether they are municipal or private, can adequately accommodate the proposed development. Full municipal or communal sanitary and water services will be the preferred method of servicing development;*

No additional private servicing is required to accommodate the proposed use.

- *The road system is adequate to accommodate projected increases in traffic;*

Access to the site is via Cromarty Drive which is a local road maintained to local standards. Impact to traffic is anticipated to be limited as a result of the requested zoning by-law amendment. The applicant advised he would be retrieving the animals from local veterinarians and other clients to be brought to the property to be cremated. No concerns were identified by the Director of Public Works or the County Engineer in the circulation of this application.

- *The land fronts on a public road (unless specifically noted as an approved private road) which is of a reasonable standard of construction and maintenance;*

The lands front onto a public road, being Cromarty Drive and furthermore, as noted, the Director of Public Works and the County Engineer identified no concerns in the circulation of this application.

- *Lot frontage and area is suitable for the proposed use and conforms to the standards required by the implementing Zoning By-law;*

The lot frontage is suitable for the proposed use and conforms to the standards of the zoning by-law. While the lot does not meet the minimum lot area requirement for the Agricultural (A) zone, staff is of the opinion that the lot is a sufficient size to accommodate the proposed small animal crematorium.

- *Adequate measures will be taken to alleviate or prevent any adverse effects that the proposed use may possibly have upon any proposed or existing adjacent use or on the natural heritage features and functions.*

Unacceptable adverse effects on surrounding uses or natural heritage features and functions are not anticipated considering the proposed use would be located within an existing building and furthermore the applicant has received an ECA from the MECP for the natural gas fired pet cremation units and a cremains processor.

As required by the terms and conditions of the ECA, the emission concentrations and temperature of the cremation units are required to remain at specific levels which are monitored by a continuous monitoring system. The terms and conditions of the ECA speak to operating parameters, emission concentration limits, noise, operation and maintenance, source testing, continuous monitoring, record retention, and notification of complaints. Through the record retention, the applicant is also required to retain all records of the continuous monitoring system for a minimum of two (2) years, to be made available to staff of the MECP upon request. Furthermore, the applicant is to notify the District Manager for the MECP of any environmental complaint within two business days of the complaint.

As the Thames Centre Comprehensive Zoning by-law does not contain a definition for a small animal crematorium, staff offer the following definition to be included within the site-specific Agricultural (A-67) Zone provisions: "Small Animal Crematorium shall mean a cremation facility which accommodates small farm animals and pets under 200 pounds".

Based on the foregoing, the subject proposal is consistent with the Provincial Planning Statement and conforms to the County of Middlesex and Thames Centre Official Plans.

CONSULTATION:

County Engineer:

No comment.

Director of Public Works:

Public Works have no comments or concerns with this application.

Drainage Superintendent:

No concerns.

Chief Building Official

No comments.

Upper Thames River Conservation Authority:

The UTRCA has ***no objections*** to the Zoning By-law Amendment application as:

- The existing building to be converted into the proposed use is outside of the UTRCA regulated area; and,
- The Wetland and Environmental Protection Zones will remain unchanged.

We wish to advise the applicant that a Section 28 Permit will **not** be required from UTRCA Regulations staff for this proposal, but that any future development to the subject lands may be subject to Section 28 Permit requirements depending on location.

Ministry of Transportation

MTO has no requirements for this application.

The owner should be aware that the subject property as a whole falls within MTO's Permit Control Area (PCA). As such, consultation with MTO is required prior to the issuance of MTO Permits, which are required prior to any demolition, grading, construction, or alteration of the site. In accordance with the Ontario Building Code, municipal permits may not be issued until such time as all other applicable requirements (i.e.: MTO permits/approvals) are satisfied.

In the circulation of the notice of public meeting to surrounding property owners, no responses have been received from the public as of the date of this report.

FINANCIAL IMPLICATIONS:

None.

STRATEGIC PLAN LINK

Pillar: *Smart Planning*

Goal: *Make smart planning decisions to grow the community , while maintaining a "hometown feel"*

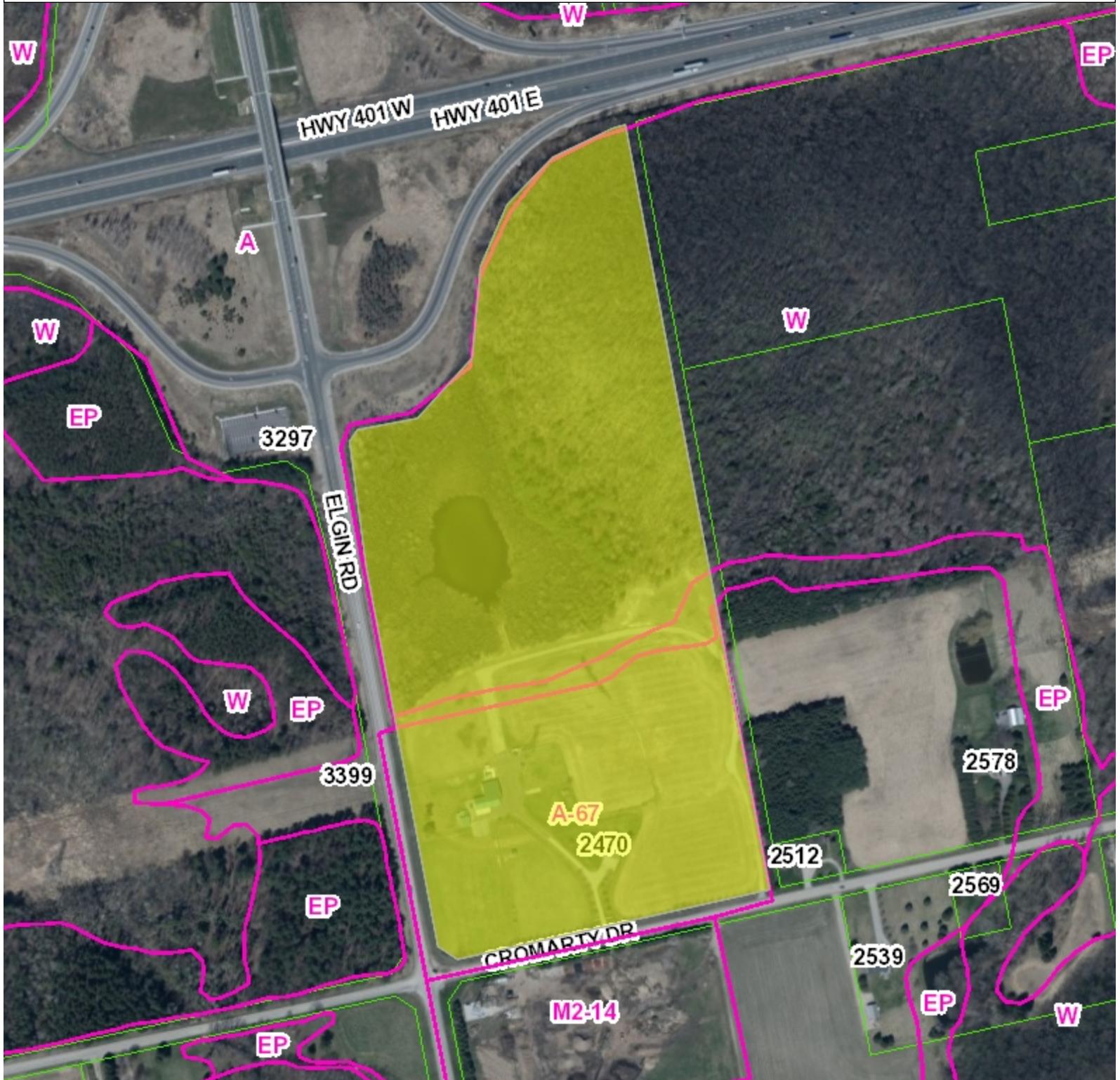
ATTACHMENTS:

Location Map

Prepared by: A. Kertesz, Planner

Reviewed by: A. Storrey, Director of Planning and Development Services

Reviewed by: D. Barrick, Chief Administrative Officer



Roll Number 392600004012800

Legal Description PLAN 158 PT LOTS 6 TO 10

Frontage 0

Depth

Area 42.36 (acres)



ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 8038-CY3HJ6

Issue Date: January 25, 2024

London Beloved Pet Cremation Inc.
2470 Cromarty Drive, Putnam
Thames Centre, Ontario
N0L 2B0

Site Location: 2470 Cromarty Drive, Putnam
Thames Centre Municipality, County of Middlesex

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

- one (1) natural gas fired pet cremation unit Matthews Environmental Solutions IEB-26, identified as Source Stack 1, processing up to 91 kilograms per hour of Non-Infectious Remains of Companion Pets, having a maximum heat input of 3,165,168 kilojoules per hour, exhausting into the atmosphere at a volumetric flow rate of 1.18 cubic metres per second, through a stack, having an exit diameter of 0.51 metre, extending 0.91 metres above the roof and 7.92 metres above grade;
- one (1) natural gas fired pet cremation unit Matthews Environmental Solutions IEB-26, identified as Source Stack2, processing up to 91 kilograms per hour of Non-Infectious Remains of Companion Pets, having a maximum heat input of 3,165,168 kilojoules per hour, exhausting into the atmosphere at a volumetric flow rate of 1.18 cubic metres per second, through a stack, having an exit diameter of 0.51 metre, extending 0.91 metres above the roof and 7.92 metres above grade; and
- one (1) cremains processor that grinds the cremains in an enclosed ventless chamber with a processing hood;

all in accordance with the Application for Approval (Air) submitted by London Beloved Pet Cremation Inc. and signed by Jeff Bushell, Owner, the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by WSP E&I Canada Limited. dated September 19, 2023, and signed by Akhter Iqbal; an email update provided by Akhter Iqbal of WSP E&I Canada Limited on December 11, 2023, January 03, 2024, January 08, 2024 and January 23, 2024.

For the purpose of this environmental compliance approval, the following definitions apply:

1. "Approval" means this entire Environmental Compliance Approval, including the application and all supporting documentation listed above;
2. "Companion Pets" means animals that were kept by humans for company, amusement or psychological support;
3. "Company" means London Beloved Pet Cremation Inc. that is responsible for the construction or operation of the Facility and includes any successors and assigns in accordance with section 19 of the EPA;
4. "Continuous Monitoring System" means the continuous monitoring system consisting of continuous monitors and recording devices;
5. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 of the EPA;
6. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
7. "EPA" means the *Environmental Protection Act* , R.S.O. 1990, c.E.19;
8. "Equipment" means the [2] pet cremation unit(s), described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
9. "ESDM Report" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document by Akhter Iqbal, WSP E&I Canada Limited and dated September 19, 2023, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
10. "Facility" means the entire operation located on the property where the Equipment is located;
11. "Infectious Substance" means a disease listed in
 - Schedule VII of the Health of Animals Regulations made under the Health of Animals Act (Canada), as amended; or
 - the Reportable Diseases Regulations made under the Health of Animals Act (Canada), as amended;

12. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those duties relate to the conditions of this Approval;
13. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
14. "Minister" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the EPA under the Executive Council Act;
15. "Ministry" means the ministry of the Minister;
16. "Non-Infectious Remains of Companion Pets" means whole carcasses or parts from carcasses of Companion Pets and are not contaminated with any Infectious Substance;
17. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA;
18. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;
19. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
20. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
21. "Publication NPC-300" means the Ministry Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300", August 2013, as amended;
22. "Report EPS 1/PG/7" means the document titled "Protocols and Performance Specifications for Continuous Monitoring of Gaseous Emissions from Thermal Power Generation - Report EPS 1/PG/7" published by Environment Canada in December 2005, as amended;
23. "Schedules" means the following schedules attached to this Approval and forming part of this Approval namely:
 - Schedule A - Source Testing Procedures;
 - Schedule B - Test Contaminants;
 - Schedule C - Continuous Temperature Monitoring System;
 - Schedule D - Continuous Oxygen Monitoring System; and
 - Schedule E - Continuous Carbon Monoxide Monitoring System;

24. "Source Testing" means site-specific sampling and testing to measure emissions resulting from operating a representative unit of the Equipment under operating conditions that will derive an emission rate that, for the relevant averaging period of the contaminant, is at least as high as the maximum emission rate that the source of contaminant is reasonably capable of, or a rate approved by the Manager within the approved operating range of the representative unit of the Equipment which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
25. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended; and
26. "Test Contaminants" means the contaminants listed in Schedule B.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. OPERATING PARAMETERS

1. The Company shall ensure that the Equipment is designed and operated to comply, when the Equipment is operating, with the following performance requirements:
 - a. the burner flame in the secondary chamber shall be established before the primary chamber is fired;
 - b. the temperature in the secondary chamber, as measured by the Continuous Monitoring System, shall be maintained at minimum of 1,000 degrees Celsius at all times when the primary chamber is loaded and incineration is in progress;
 - c. the residence time of the combustion gases in the secondary combustion chamber shall be at a minimum one second at a temperature of at least 1,000 degrees Celsius; and
 - d. the burner in the primary chamber shall shut off automatically if the secondary chamber burner fails.
2. The Company shall ensure that only Non-Infectious Remains of Companion Pets are burned in the Equipment.

2. EMISSION CONCENTRATION LIMITS

1. The Company shall ensure that the Equipment is designed and operated to comply, when the Equipment is operating, with the following performance requirements:

- a. the concentration of oxygen in the undiluted flue gas leaving the secondary combustion chamber of the Equipment, as recorded by the Continuous Monitoring System, shall not be less than 6 percent by volume on a dry basis, calculated as a 10-minute average;
- b. the half-hour average concentration of carbon monoxide in the undiluted flue gases leaving the secondary combustion chamber of the Equipment, as recorded by the Continuous Monitoring System, shall not exceed 100 parts per million by volume, on a dry basis normalized to 11 percent oxygen; and
- c. the concentration of organic matter in the combustion gases leaving the secondary chamber of the Equipment, expressed as equivalent methane (Total Hydrocarbon Compounds), being an average of ten measurements taken at approximately one minute intervals, shall not exceed 100 parts per million by volume, on an undiluted basis.

3. NOISE

1. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.

4. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Facility/Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare not later than three (3) months after the date of this Approval, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including as a minimum:
 - i. procedures to ensure that only Non-Infectious Remains of Companion Pets are processed in the Equipment;
 - ii. operating and maintenance procedures in accordance with good engineering practice, including annual inspection procedures as recommended by the Equipment and Continuous Monitoring System suppliers;
 - iii. emergency procedures;
 - iv. procedures to control all discharges from the Equipment in the event of loss or failure of power source to the Equipment;
 - v. procedures for any record keeping activities relating to the operation and maintenance of the Equipment and the Continuous Monitoring System;

- vi. procedures for operator training which is to be provided by an individual experienced with the Equipment;
- vii. procedures for recording and responding to complaints regarding the operation of the Equipment; and
- viii. all appropriate measures to minimize noise, fugitive dust and odorous emissions from all potential sources at the Facility;

- b. implement the recommendations of the Manual.

5. SOURCE TESTING

- 1. The Company shall perform Source Testing in accordance with the procedure outlined in Schedule A, to determine the rate of emission of Total Suspended Particulate Matter and Total Hydrocarbon Compounds from the representative unit of the Equipment.
- 2. In the event that the results of the Source Testing required by Condition 5.1 indicate that the concentration of Total Suspended Particulate Matter in the undiluted gas emitted from the Equipment exceeds 20 milligrams per cubic metre on a dry basis, normalized to 11% oxygen at a reference temperature of 25 degrees Celsius and a reference pressure of 101.3 kilopascals, the Company shall perform a second Source Testing in accordance with the procedure outlined in Schedule A, to determine the rate of emissions of the Test Contaminants listed in Schedule B from the Equipment.

6. CONTINUOUS MONITORING

- 1. The Company shall, prior to the commencement of operation of the Equipment, install and subsequently conduct and maintain a program to continuously monitor:
 - a. the temperature at the location in the secondary chamber of the Equipment where the minimum retention time of the combustion gases at a minimum temperature of 1,000 degrees Celsius for at least one second is achieved; and
 - b. the carbon monoxide and oxygen concentration in the undiluted flue gas leaving the secondary chamber of the Equipment.
- 2. The Continuous Monitoring System shall be equipped with continuous recording devices and shall comply with the requirements outlined in the attached Schedules C, D, and E.

7. RECORD RETENTION

1. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval. These records shall be made available to staff of the Ministry upon request. The Company shall retain:
 - a. all records on maintenance, repair and inspection of the Equipment and the Continuous Monitoring System;
 - b. all records produced by the Continuous Monitoring System;
 - c. all records of operator training;
 - d. all records on the environmental complaints, including:
 - i. a description, time and date of the incident;
 - ii. wind direction at the time of the incident; and
 - iii. a description of the measures taken to address the cause of the incident and to prevent a similar occurrence in the future;
 - e. daily records of each load processed by the Equipment; and
 - f. description of any upset conditions associated with the operation of the Equipment and remedial action taken.

8. NOTIFICATION OF COMPLAINTS

1. The Company shall notify the District Manager, in writing, of each environmental complaint and the measures taken to address the complaint within two (2) business days of the complaint. The notification shall include:
 - a. a description of the nature of the complaint; and
 - b. the time and date of the incident to which the complaint relates.

SCHEDULE A

Source Testing Procedures

1. The Company shall submit, not later than three (3) months after the commencement of operation of the Equipment, to the Manager a Pre-Test Plan for the Source Testing required under this Approval.
2. Should a second Source Testing be required, the Company shall submit, not later than three (3) months after the completion of the first Source Testing, or a date agreed upon in consultation with the District Manager, to the Manager a Pre-Test Plan for the Source Testing required under this Approval.
3. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
4. The Company shall complete the Source Testing, no later than three (3) months after the Manager has approved the Pre-Test Plan, or a date agreed upon in consultation with the District Manager.
5. The Company shall notify the Manager, the District Manager and the Director in writing of the location, date and time of any impending Source Testing required by this Approval, at least fifteen (15) days prior to the Source Testing.
6. The Company shall submit a report (electronic format) on the Source Testing to the Manager, District Manager and the Director not later than three (3) months after completing the Source Testing. The report shall be in the format described in the Source Testing Code, and shall also include, but not be limited to:
 1. an executive summary;
 2. records of operating conditions at the time of Source Testing, including but not limited to the following:
 - a. production data; and
 - b. Facility/process information related to the operation of the Equipment;
 3. all records produced by the Continuous Monitoring System;
 4. all records of the cremator settings during cremation;
 5. results of the Source Testing, including the emission rate and emission concentration of the Test Contaminants; and
 6. a tabular comparison of calculated emission rates based on Source Testing results for the Test Contaminants to relevant estimates described in the ESDM Report.

7. The Director may not accept the results of the Source Testing if:
 1. the Source Testing Code or the requirements of the Manager were not followed; or
 2. the Company did not notify the Manager, the District Manager and the Director of the Source Testing; or
 3. the Company failed to provide a complete report on the Source Testing.
8. If the Director does not accept the results of the Source Testing, the Director may require re-testing. If re-testing is required, the Pre-Test Plan strategies need to be revised and submitted to the Manager for approval. The action taken to minimize the possibility of the Source Testing results not being accepted by the Director must be noted in the revision.
9. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM Report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

SCHEDULE B

Test Contaminants

- Total Hydrocarbon Compounds
- Hydrogen Chloride
- Total Suspended Particulate Matter
- Benzo(a)pyrene
- Naphthalene
- Acrolein

List of Dioxins, Furans and Dioxin-like PCBs

- 2,3,7,8-Tetrachlorodibenzo-p-dioxin [2,3,7,8-TCDD]
- 1,2,3,7,8-Pentachlorodibenzo-p-dioxin [1,2,3,7,8-PeCDD]
- 1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,4,7,8-HxCDD]
- 1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,6,7,8-HxCDD]
- 1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin [1,2,3,7,8,9-HxCDD]
- 1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin [1,2,3,4,6,7,8-HpCDD]
- 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin [1,2,3,4,6,7,8,9-OCDD]
- 2,3,7,8-Tetrachlorodibenzofuran [2,3,7,8-TCDF]
- 2,3,4,7,8-Pentachlorodibenzofuran [2,3,4,7,8-PeCDF]
- 1,2,3,7,8-Pentachlorodibenzofuran [1,2,3,7,8-PeCDF]
- 1,2,3,4,7,8-Hexachlorodibenzofuran [1,2,3,4,7,8-HxCDF]
- 1,2,3,6,7,8-Hexachlorodibenzofuran [1,2,3,6,7,8-HxCDF]
- 1,2,3,7,8,9-Hexachlorodibenzofuran [1,2,3,7,8,9-HxCDF]
- 2,3,4,6,7,8-Hexachlorodibenzofuran [2,3,4,6,7,8-HxCDF]
- 1,2,3,4,6,7,8-Heptachlorodibenzofuran [1,2,3,4,6,7,8-HpCDF]
- 1,2,3,4,7,8,9-Heptachlorodibenzofuran [1,2,3,4,7,8,9-HpCDF]
- 1,2,3,4,6,7,8,9-Octachlorodibenzofuran [1,2,3,4,6,7,8,9-OCDF]
- 3,3',4,4'-Tetrachlorobiphenyl [3,3',4,4'-tetraCB (PCB 77)]
- 3,4,4',5- Tetrachlorobiphenyl [3,4,4',5-tetraCB (PCB 81)]
- 3,3',4,4',5- Pentachlorobiphenyl (PCB 126) [3,3',4,4',5-pentaCB (PCB 126)]
- 3,3',4,4',5,5'- Hexachlorobiphenyl [3,3',4,4',5,5'-hexaCB (PCB 169)]
- 2,3,3',4,4'- Pentachlorobiphenyl [2,3,3',4,4'-pentaCB (PCB 105)]
- 2,3,4,4',5- Pentachlorobiphenyl [2,3,4,4',5-pentaCB (PCB 114)]
- 2,3',4,4',5- Pentachlorobiphenyl [2,3',4,4',5-pentaCB (PCB 118)]
- 2',3,4,4',5- Pentachlorobiphenyl [2',3,4,4',5-pentaCB (PCB 123)]
- 2,3,3',4,4',5- Hexachlorobiphenyl [2,3,3',4,4',5-hexaCB (PCB 156)]
- 2,3,3',4,4',5'- Hexachlorobiphenyl [2,3,3',4,4',5'-hexaCB (PCB 157)]
- 2,3',4,4',5,5'- Hexachlorobiphenyl [2,3',4,4',5,5'-hexaCB (PCB 167)]
- 2,3,3',4,4',5,5'- Heptachlorobiphenyl [2,3,3',4,4',5,5'-heptaCB (PCB 189)]

SCHEDULE C

Continuous Temperature Monitoring System

PARAMETER:

Temperature

LOCATION:

The sample point for the Continuous Temperature Monitor shall be located in the secondary chamber where the minimum retention time of the combustion gases at a minimum temperature of 1,000 degrees Celsius for at least one second is achieved.

PERFORMANCE:

The Continuous Temperature Monitor shall meet the following minimum performance specifications for the following parameters:

| PARAMETERS | SPECIFICATION |
|-------------------|---|
| Type | shielded "K" type thermocouple, or equivalent |
| Accuracy | ± 1.5 percent of the minimum gas temperature |

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitoring system without a significant loss of accuracy and with a time resolution of 1 minute or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

SCHEDULE D

Continuous Oxygen Monitoring System

PARAMETER:

Oxygen

INSTALLATION:

The Continuous Oxygen Monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of oxygen in the undiluted gases leaving the secondary chamber of the Equipment and shall meet the following installation specifications:

| PARAMETERS | SPECIFICATION |
|-----------------------|---------------------------|
| Range (percentage) | 0 to 20 or 0 to 25 |
| Calibration Gas Ports | close to the sample point |

PERFORMANCE:

The Continuous Oxygen Monitor shall meet the following minimum performance specifications for the following parameters:

| PARAMETERS | SPECIFICATION |
|--|---|
| Span Value (percentage) | 80 to 100 percent of full scale |
| Relative Accuracy | the greater of less than or equal to 10 percent of the mean value of the reference method test data or 0.5 percent O ₂ average absolute difference |
| Calibration Error | 0.5 percent O ₂ |
| System Bias | the greater of less than or equal to 4 percent of the mean value of the reference method test data or 0.5 percent O ₂ average absolute difference |
| Procedure for Zero and Span Calibration Check | all system components checked |
| Zero Calibration Drift (24-hour) | less than or equal to 0.5 percent O ₂ |
| Span Calibration Drift (24-hour) | less than or equal to 0.5 percent O ₂ |
| Response Time (90 percent response to a step change) | less than or equal to 180 seconds |
| Operational Test Period | at least 168 hours without corrective maintenance |

CALIBRATION:

Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EPS 1/PG/7.

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better and with a time resolution of 2 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.

SCHEDULE E

Continuous Carbon Monoxide Monitoring System

PARAMETER:

Carbon Monoxide

INSTALLATION:

The Continuous Carbon Monoxide Monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of carbon monoxide in the undiluted gases leaving the secondary chamber of the Equipment and shall meet the following installation specifications:

| PARAMETERS | SPECIFICATION |
|--------------------------------|---------------------------|
| Range (parts per million, ppm) | 0 to ≥ 200 |
| Calibration Gas Ports | close to the sample point |

PERFORMANCE:

The Continuous Carbon Monoxide Monitor shall meet the following minimum performance specifications for the following parameters:

| PARAMETERS | SPECIFICATION |
|--|--|
| Span Value (nearest ppm equivalent) | 80 to 100 percent of full scale |
| Relative Accuracy | the greater of less than or equal to 10 percent of the mean value of the reference method test data or 5 ppm average absolute difference |
| Calibration Error | less than or equal to 2 percent of the actual concentration |
| System Bias | the greater of less than or equal to 4 percent of the mean value of the reference method test data or 5 ppm average absolute difference |
| Procedure for Zero and Span Calibration Check | all system components checked |
| Zero Calibration Drift (24-hour) | less than or equal to 5 percent of span value |
| Span Calibration Drift (24-hour) | less than or equal to 5 percent of span value |
| Response Time (90 percent response to a step change) | less than or equal to 180 seconds |
| Operational Test Period | at least 168 hours without corrective maintenance |

CALIBRATION:

Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EPS 1/PG/7.

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better and with a time resolution of 2 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter

The reasons for the imposition of these terms and conditions are as follows:

1. OPERATING PARAMETERS, EMISSION CONCENTRATION LIMITS, AND NOISE

Conditions No. 1, 2 and 3 are included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility/Equipment.

2. OPERATION AND MAINTENANCE

Condition No. 4 is included to emphasize that the Equipment must be operated and maintained according to a procedure that will result in compliance with the EPA, the regulations and this Approval.

3. SOURCE TESTING AND CONTINUOUS MONITORING

Conditions No. 5 and 6 are included to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations and this Approval can be verified.

4. RECORD RETENTION

Condition No. 7 is included to require the Company to keep records and provide information to the Ministry so that the environmental impact and subsequent compliance with the EPA, the regulations and this Approval can be verified.

5. NOTIFICATION OF COMPLAINTS

Condition No. 8 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me, the Ontario Land Tribunal and in accordance with Section 47 of the *Environmental Bill of Rights*, 1993, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

and

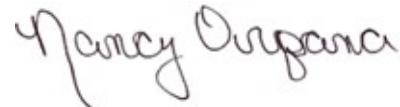
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

* **Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights*, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

DATED AT TORONTO this 25th day of January, 2024



Nancy E Orpana, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

TC/

c: District Manager, MECP London - District
Akhter Iqbal, WSP E&I Canada Limited

ANNEX C

CORRESPONDENCE FROM THE ONTARIO MINISTRY OF AGRICULTURE, FOOD AND RURAL AFFAIRS (OMAFRA) CONFIRMING THAT A NUTRIENT MANAGEMENT STRATEGY IS NOT REQUIRED FOR THE PROPOSED ANIMAL CREMATORIUM

From: Wilson, Matt (OMAFA)
Sent: Tuesday, October 14, 2025 11:38 AM
To: Matthew Bowcott
Subject: RE: Proposed Animal Crematorium - Nutrient Management Plan Requirements

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Matt

A contact from MECP you may want to contact is “Bijal Shah, lead engineer at the air permissions unit.”

Please use the email I sent as confirmation you don’t need a NMS – generally an email is all that is needed, if the municipality has further questions they can contact me directly

Here is a link to the form to apply for a license to collect deadstock
<https://forms.mgcs.gov.on.ca/en/dataset/on00285#:~:text=Reg.-,105/09,be%20mailed%20to%20the%20applicant.>

Thanks
Matt

Matt Wilson
*Nutrient Management Team Lead,
Regulatory Programs Delivery Unit | Environmental Management Branch
Ontario Ministry of Agriculture Food and Agribusiness | Ontario Public
Service*



Taking pride in strengthening Ontario, its places and its people

From: Matthew Bowcott
Sent: October 3, 2025 4:11 PM
To: Wilson, Matt (OMAFA)
Subject: RE: Proposed Animal Crematorium - Nutrient Management Plan Requirements

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Matt,

Thanks for getting back to me. I appreciate the clarification on the requirement for the NMS. Seeing as our facility will not require one, would you or someone from OMAFRA be able to provide a general letter to that affect that could be provided to municipal council as confirmation?

In regards to the licensing requirements, this is something that I would definitely like to discuss further with yourself or anyone you may be able to direct me to. In reading through the provided link I see mentioned of deadstock and composting facilities but nothing that directly mentions incineration/cremation. In general context I would guess that we will need to seek a license which is fine with us. Do you know of any consulting firms that would assist with something like this? Are you or your team able to assist? The intent for the equine portion of the crematorium would have animals arriving one of two ways. They would either be dropped off by the owner of the animal, or they would be picked up by us. If they would be picked up by us I now see that specific vehicle requirements will need to be licensed and approved, for this I will need to gather more details and clarification. Our facility will also house large drive in (forklift/telehandler)freezers to store animals until cremation. There may also be requirements around these freezers as well? It does sound like this piece is something we will require more information and assistance with. Any further direction or help would be greatly appreciated.

Thanks again for the prompt response. I really appreciate you steering us in the right direction. We aim to ensure that we are in full compliance with all governing bodies.

MATT BOWCOTT

PRESIDENT

TRIGON CONSTRUCTION MANAGEMENT

GoodLife FITNESS Construction Team

A: 35 Ridgeway Circle, Woodstock ON N4V 1C9



From: Wilson, Matt (OMAFA)

Sent: Friday, October 3, 2025 3:54 PM

To: Matthew Bowcott

Subject: RE: Proposed Animal Crematorium - Nutrient Management Plan Requirements

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Matt

You will not require a Nutrient Management Strategy (NMS) for the building that will be used for the cremation units.

The NMS is triggered when you require a building permit for livestock housing or manure storage.

Have you looked into licensing requirements for dealing with the horses, which are considered livestock under the dead animal disposal act? <https://www.ontario.ca/page/farm-deadstock-licensing-requirements>

Happy to discuss more if needed

Thanks
Matt

Matt Wilson

*Nutrient Management Team Lead,
Regulatory Programs Delivery Unit | Environmental Management Branch
Ontario Ministry of Agriculture Food and Agribusiness | Ontario Public
Service*



Taking pride in strengthening Ontario, its places and its people

From: Matthew Bowcott
Sent: October 3, 2025 2:22 PM
To: Wilson, Matt (OMAFA)
Subject: Proposed Animal Crematorium - Nutrient Management Plan Requirements

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hi Matt,

I was provided your contact information from the staff at Nutrient Management Strategies and Plans. I had reached out to them for information regarding the requirements surrounding Nutrient Management Plans revolving about animal crematorium facilities. My wife and I are currently working with our local township and county on a proposed animal crematorium business which we would like to locate on our family farm just outside of Innerkip Ontario. Our proposal would include for the construction of a new building to house 4 gas fired cremation units which would support both equine and small animal needs. We have consulted with local administration, council, conservation authorities, as well as our official planners and engineers. During a recent public meeting (Oct 1st), two members of our community asked if we had a nutrient management plan. This was the first time anyone had mentioned such a plan to me so I am now researching and gathering information on whether this is required for our facility or not.

In speaking with Nutrient Management Strategies, they had mentioned that they had worked on similar facilities as well as other doing animal testing and things of that nature. They had noted that typically these types of facilities would not require a nutrient management plan. They then direct me to yourself to hopefully provide further clarification or direction.

Our process and journey through all of this has been through collaboration and education which is why I am reaching out today. I am happy to provide any and all details surrounding our proposed location in an attempt to achieve further direction from yourself and OMAFRA on what we are required to do.

Any guidance or information you are able to assist us with would be appreciated.

I look forward to hearing back from you.

Thanks,

MATT BOWCOTT
PRESIDENT

TRIGON CONSTRUCTION MANAGEMENT

GoodLife FITNESS Construction Team

A: 35 Ridgeway Circle, Woodstock ON N4V 1C9





Dustin Robson
RPP, MCIP Development Planner
County of Oxford
Community Planning

Katie Belore
Owner – Princeton Farms Inc.
726614 Township Road 3
Princeton ON
N0J 1V0

Re: Files OP 28-08-1 & ZN 1-25-05 (Matthew and Jaclynn Bowcott)

I am writing today as an owner of Princeton Farms Inc. – a premier Standardbred breeding facility based out of Princeton Ontario. We are a family owned and operated business and raise Standardbred racehorses that are sold in auctions across North America. We currently house a band of 82 broodmares, with a total on farm population of 162 horses (comprised of mares, foals and yearlings). Approximately 40% of the horses on our farm are owned by outside clientele who trust us to care for their horses year-round. We operate on 105 total acres of land (80% owned land, and 20% rented). Ontario holds roughly 25% of Canadas equine population – of that 25%, approximately 6000 horses are Standardbreds.

The horses in our care are given individualized treatment and development plans from the day they are born. These horses are treated much like human athletes and they are deeply loved by their owners, trainer and caregivers. Currently, Ontario has a significant gap in service as it relates to equine cremation services. Meaning: owners are often faced with lack of options to provide their horses with dignified end of life options. I can personally attest to having had multiple conversations with clients explaining that if they wish to cremate their horse, their only option is to send that horse out of Ontario – at a cost of over \$6000. Breeders and most equine facilities do not have the additional land or equipment required to bury every horse on site (sometimes this is not even possible due to frozen



ground and/or lack of equipment needed to do so). This often leaves owners with a single option: deadstock.

The facility being proposed on Blandford Road will fill an important gap in equine welfare. I have had a chance to review the business plan and discuss the logistics of their operation. From a horse owner perspective – the value is clear, concise and well meaning: this is a service that allows owners to honour their horses with the same dignity shown to them in life.

If I can answer any further information around the need for this service from an equine owner perspective please do not hesitate to contact me directly.

Katie Belore

November 11, 2025

Dustin Robson,
RPP, MCIP Development Planner
County of Oxford
Community Planning

Tricia Bissett
43 Briar Dr
Innerkip, ON
N0J 1M0

Re: Files OP 28-08-1 & ZN 1-25-05 (Matthew and Jaclynn Bowcott)

I am writing to share my support for the proposed animal crematorium to be located just outside of Innerkip. I believe this facility would be a valuable and respectful addition to our community, providing a much-needed service for local resident's and veterinarians while maintaining our rural character and integrity.

My family along with many other families consider their pets to be members of the family and the loss of a pet is a heartbreakng experience. Having a local, professional cremation service would allow families to say goodbye with dignity and care without the need to travel long distances.

Beyond the personal and emotional benefits, the crematorium would also contribute to our local economy by creating jobs and supporting related businesses. It's a small but meaningful way to strengthen local services while remaining sensitive to community values. From what I understand, the proposed facility will operate with modern, environmentally responsible equipment that minimizes emissions and noise.

I respectfully urge you to approve this proposal and support the establishment of the animal crematorium. It represents a thoughtful and compassionate service for residents and their beloved pets.

Thank you for your consideration.

Tricia Bissett

Henry & Carole Vink
785861 Township Rd 6
Innerkip, On N0J 1M0

December 3, 2025

Dustin Robson, RPP, MCIP Development Planner
County of Oxford Community Planning

Dear Dustin,

I hope this message finds you well. As a neighbor of the Bowcott family, I wanted to express my support for their proposal for a crematory. After watching via YouTube the recent township meeting, I can confidently say that we have no issues or concerns regarding this project.

My husband has lived in Oxford County all his life, and I have been a resident for 38 years. We recently moved back to the Innerkip area and actively support small businesses in our community. During the meeting, I noted the concerns about noise levels. Just the other day, we were outside when the Christmas train passed by, and I heard a humming noise coming from a nearby farm, approximately 2,000-3,000 feet away. My husband explained that it was a dryer operating there. This made me question why it seems acceptable for a farmer to create such loud noise but not for a crematory, which is expected to produce less noise.

All other inquiries raised during the meeting were addressed thoughtfully, particularly those concerning odor, location, traffic implications, the use of proper farmland, creek contamination, loss of trees, and other related factors. The Bowcotts made it clear that they have taken these issues into account and have proposed solutions that respect the community and environment.

We are in full support of the Bowcott's proposal and appreciate your attention to this matter. I look forward to seeing the positive contributions this development will bring to our community.

Sincerely,
Carole Vink

September 29 2025

Canning Veterinary Professional Corporation
319 Briarhill Road
Woodstock ON
N4S 7T5

TO:

Dustin Robson, RPP, MCIP Development Planner
County of Oxford Community Planning

Dear Mr. Dustin Robson

Thank you for your time in reading and considering this letter. I am writing to express my support for the approval of a local crematorium service for animals/pets in Oxford County. My name is Paisley Canning, DVM, PhD and I am a veterinarian living and working in Woodstock. I have a wide range of experience from large animal to emergency medicine to small animal and exotics, and I can assure you that having a local option for cremation would be beneficial and important for all types of veterinary services listed above.

Currently there is only Gateway Pet Memorial Services in Guelph that provides private and communal pet cremation and memorial products like clay paw prints, and urns. They have locations in Guelph, Ottawa, Toronto and Smithville. As Gateway is the only option available to veterinarians, this has created a monopoly in market share, reduced options for our clients, and reduced price competition. As the closest location is in Guelph, this is not accessible for most clients if they wish to bring their pet directly to the crematorium or would like custom services, as it is a one hour drive away from Oxford County.

As a veterinarian, I have been consistently disappointed and concerned that I can only offer my clients one option for cremation services, and that that option is very expensive. If there was a local option that could create some market choice, competitive pricing with geographical proximity, that would be a huge relief and value to pet owners. I highly support approval for a local pet crematorium

Additionally expanding Ontario's capacity for cremation could also be very useful if there is an animal disease outbreak (god forbid) but it would provide local disposal options, thereby reducing the need to transport infected/contagious animals out of the county for disposal. As a result, I highly support the opening of a local animal/pet crematorium in our county.

Thank you

Dr. Paisley Canning
CVO 65977

November 10, 2025

Dustin Robson
RPP, MCIP Development Planner
County of Oxford Community Planning

Tracy Cassells
725965 Township Rd 3
Woodstock, ON
N4S7V9

Re: Files OP 28-08-1 & ZN 1-25-05 (Matthew and Jaclynn Bowcott)

Dear Mr. Dustin Robson,

I am writing today as a local resident, hobby farmer, and horse owner to express my support for having an animal crematorium located in our area. As someone who works closely with animals and values their welfare, I believe such a facility would offer significant practical and emotional benefits to our rural and farming community.

Large animals such as horses present unique challenges when they pass away. Burials are not always a feasible or environmentally sound option due to land use restrictions, soil conditions, and groundwater concerns. Transporting a deceased animal long distance for cremation or disposal is also costly and distressing during an already difficult time. Having a local crematorium would make it possible to handle these situations with dignity, efficiency, and respect.

A nearby animal crematorium would also benefit smaller-scale farmers and pet owners in the townships by providing a humane and environmentally responsible alternative to traditional disposal methods. It would allow owners to choose a respectful farewell for their animals, while reducing the environmental footprint associated with burial or lengthy transport.

In addition, such a facility can help strengthen the local agricultural and veterinary support network, ensuring that end-of-life care is available locally and handled according to the highest standards of animal welfare and environmental responsibility.

For those of us who see our animals not only as livestock but as companions and partners in our daily lives, having access to these services close to home would bring great peace of mind.

Thank you for considering this important addition to our community.

Tracy Cassells
Hobby Farmer and Horse Owner

From: Lisa Gill
Sent: Friday, April 11, 2025 11:16 AM
To: Matthew Bowcott
Subject: Support for Proposed Animal Crematory

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom this may concern,

I hope this message finds you well.

We are writing to inform you that we recently had the opportunity to meet our neighbors who live across the street from us.

We reside at 806009 Oxford Road 29 in Inverkip, Ontario.

They kindly took the time to speak with us about their new development plans on their property, which include the installation of an animal crematory.

After learning about their proposal and understanding the nature of the project, we would like to express that we have no objections to their plan.

Please feel free to reach out if you require any further information or clarification.

Kind regards,

Lisa and Jeffrey Gill

December 8, 2025

Dustin Robson
RPP, MCIP Development Planner
County of Oxford Community Planning

Ron Vink
41 Elisabeth Street
Innerkip, ON
N0J1M0

Re: Files OP 28-08-1 & ZN 1-25-05 (Matthew and Jaclynn Bowcott)

Dear Mr. Dustin Robson,

I am a lifetime resident of Innerkip, I am a business owner that is based in Innerkip, and I am a pet owner. I am writing this letter today in support of the proposed animal crematorium in our community.

As a resident of Innerkip for some 54 years, I have seen our community progress and develop. I appreciate all that it has to offer and the amenities that are available to us. Quality of life, safety, access to required facilities and services have always been afforded to all who live here. Seeing new initiatives coming forward is exciting and needed for our community.

As a business owner I am one who is committed to giving back to the community that has provided for my family. Businesses provide employment, economic stimulus and provide much needed products or services to those in the community.

The proposed animal crematorium would be a very valuable addition to our community, providing all of the aforementioned benefits for our community. With the information presented I feel that the facility will be constructed in matter that will have minimal impact on surrounding properties and our environment while introducing many new benefits.

I would like to encourage you to support this application.

Best,



Ron Vink

April 7th, 2025

To whom it may concern,

On behalf of Rural Oxford Economic Development, please accept this letter in support of the Bowcott's proposal for a zone change and official plan amendment on their 75 acres property located at 806012 Oxford Road 29 in Blandford-Blenheim Township.

Matt and his wife Jacky (a local veterinarian), would like to build a 100 x 100 square foot animal crematorium on 1.5 acres to the side of their property. The building would be appropriately setback, have minimal impact to the farm's current agricultural activity and no impact on nearby conservation areas. They intend to plant ample trees to shield visibility to maintain a low-key presence and provide discretion for clients' during sentimental times. Inside, the building will hold three different sized cremation units and a small reception/office area.

The business is being designed to be able to serve a variety of vet clinics and farmers to meet their small, medium, and large animal/pet cremation needs. The Bowcott's plan to investment \$6.5M and create six quality agricultural related jobs. Four positions will be on-site, and two will be on-the-road. Further, they will be supporting the Township's local economy through increased commercial tax assessment.

In preparing their business case, the Bowcott's have been transparent, thorough, practical, and mindful to engage various stakeholders for input. We believe this proposal aligns with Goal 1.2.3 of Oxford County's 2023-26 Strategic Plan (Support the long-term sustainability of agricultural land and industry through a balanced approach to growth and development). We respect the policies in place to protect prime agriculture land, and we also support smart, balanced growth in rural Oxford County where agricultural related businesses can prosper.

Thank you for your consideration.

Kind regards,



Ronda Stewart, Ec. D.
Economic Development Director

From:
To: [Planning](#)
Subject: Building of Crematorium
Date: Sunday, September 7, 2025 7:17:57 AM

September 7, 2025

Attention:

Dustin Robson
Development Planner
County of Oxford
PO Box 1614, 21 Reeve St
Woodstock, On
N4S 7Y3

Email: planning@oxfordcounty.ca
File #: OP25-08 I and ZN1-25-05. Owners Matthew & Jacklynn Bowcot
Applicant: Zelinka Priamo Ltd.

Dear Mr. Robson:

Our family have been a resident of the Vink Estates in Innerkip for 37 years. We have raised our kids and grandkids and proud to be part of this community.

Our concerns are as follows of a Crematorium built in our vicinity.

What happens to the ashes after the animals are cremated? Are these scattered? These could affect our air quality within the vicinity of our homes, soil, and wells.

How does this affect our overall health?

Incinerators pose a different kind of risk: air emissions. An incinerator that is operated improperly or otherwise malfunctioning can result in odour and smoke complaints. Even though these may be modern technology and using advanced filtration techniques, over the years of wear and tear, things do break down. Is there a policy in place to prevent this?

Changing the zoning: Does this attract other businesses/factories to build in our area? Will this affect our property value in the future?

Running 24/7? Is there a noise factor we should be aware of? What about our wildlife

These are a few of my concerns. I appreciate you taking the time to give these your attention.
Linda Fader
36 Harwood St.
Inniskip, Ont
N0J 1M0

Dustin Robson-Development Planner Community Planning County of Oxford

Re: File No: OP 25-08-1 and ZN 1-25-05

Owners: Matthew and Jacklynn Bowcott

Applicant: Zelinka Priamo Ltd

Aug 5, 2025

Good morning Dustin;

Thank you for our telephone conversation on July 22, 2025. I appreciate your time, our conversation and the information offered with regards to the many concerns we have regarding the proposed official plan amendment and zone change applications that have been submitted in order to move forward with building a factory/animal crematorium in our back yard and rural Innerkip community.

On your recommendation it is with full intention that we make our concerns known in writing to you, your office, the owners, applicants, Township Council and Oxford County offices. We would also like to clearly indicate our interest in receiving all copies of staff reports, notices of decision as well as any other written correspondence regarding this application and its process.

As discussed from the view of our perspective, this application and the proposal of pet crematorium in our back yard and rural Innerkip is nothing short of disgusting, disappointing not to mention an un-neighborly approach and business proposal with no apparent regard for the families who live and have invested in Innerkip and Oxford County.

A brief outline of our concerns are, but not limited to:

Location

Factory Size; 10, 000 ft 2

Exhaust / Stack Height; 15 meter

Parking lot / Drive thru

Traffic; including large trucks transporting deceased animals

Pollution / Particulates (burning)

Incinerator vibrations / emissions / noise / decibels levels

Odor / Gases

Short / long term human / animal health risks (known/unknown) ref; Wind turbine health issues

Environmental implications / impact (known/unknown)

Ecosystem; Creek/Fish/Birds/Wildlife

Property Values / Public Perception

Thank you for your time and your consideration of our concerns regarding our home, investment and our future in rural Innerkip.

Jennifer L. Glasser

775810 Blandford Road

RR2, Innerkip ON N0J 1M0

Executor for the Estate of Wayne Leslie Harold Harris
805956 Oxford Road 29
Innerkip, ON
N0J 1M0

August 13, 2025

Development Planner
Community Planning
County of Oxford
P.O. Box 1614, 21 Reeve Street
Woodstock, ON
N4S 7Y3

Dear Mr. Robson:

I am writing to you with my concerns for the Zoning change for:

File No.: OP 25-08-1 and ZN 1-25-05
Owners: Matthew and Jacklynn Bowcott
Applicant: Zelinka Priamo Ltd.

I am a very close neighbour to the proposed change / location and I do not believe this change should be approved. The increase in traffic to the Blandford Road and to the corner of Oxford Road 29 and the Blandford Road will be an issue for residents and a safety concern as that corner is already quite busy. There would also be an increase in noise due to the traffic and perhaps the building itself that would impact the current residents enjoyment of their country living. I am also concerned with the potential for contamination into our wells or the creek that runs right beside the proposed location. We also have to consider the odour that could come from the proposed facility as they are burning dead animals, including wildlife and large farm 'pets'. Another item to consider is the potential for growth to this facility, how big could it become? Or the possibility of asking for a further zoning change to allow for Dead Stock or an abattoir to be part of A2. This is farm land and not a location for a crematorium / factory!

I want to receive a copy of any staff reports and/or council decisions on this change please. I also want to be informed of any meetings where this change will be discussed so I may attend.

Sincerely,



Cheryl Kornaker
Executor for the Estate of Wayne Leslie Harold Harris

From:
To: [Planning](#)
Subject: File No.OP 25-08-01 and ZN 1-25-05 Owner Matthew and Jacklyn Bowcott Applicant: Zelinka Priamo Ltd
Date: Thursday, August 14, 2025 11:13:03 AM

Hello,
Dustin Robson

As a concerned resident of Innerkip, I am writing to express strong reservations about the proposed construction of a pet crematorium in our small and cherished township.

Innerkip is known for its clean air, peaceful atmosphere, and close-knit community. The idea of animal cremation taking place in our backyard raises legitimate concerns regarding air quality, odour, and the psychological impact of such a facility on residents—especially children. The thought of smoke, however well-managed, carrying the scent or knowledge of animal remains burning, is deeply unsettling to many of us.

While we understand the need for respectful pet aftercare, locating such a facility within or near residential zones seems inappropriate. This could be the beginning of industrial facilities slowly creeping into our community, chipping away at the rural, tranquil charm that makes Innerkip so special.

Our concerns include:

- **Air quality and odour:** Despite modern filtration systems, no system is perfect, and the risk of unpleasant smells or emissions remains.
- **Emotional and psychological wellbeing:** The idea of animal cremation occurring nearby can be distressing to many, particularly children and pet lovers.
- **Precedent for further industrial development:** Approving this facility could open the door to more industrial or inappropriate businesses being placed in our township.
- **Property value implications:** The presence of a crematorium may affect local property values due to perception and concern from potential buyers.

We urge decision-makers to prioritize the character, wellbeing, and long-term vision of Innerkip. A pet crematorium, however needed in general, does not belong in a residential, family-focused community like ours.

We respectfully ask that this proposal be reconsidered and that alternative, more industrial or rural locations be evaluated.

Sincerely,
Susan Nicholas
11 Lock Street, Innerkip

18 August 2025

Re: File # OP-25-06 and ZN 1-25-05

Property location: 806012 Oxford Rd 29 Blandford Blenheim

Proposed zone change from A2 to A2 -sp to permit animal crematorium

I am submitting this letter as notice that I am **OPPOSING** the above application. The current proposal is for a very large crematorium, capable to handle large quantities of animals, much more than a mere dog or cat crematorium. I respectfully submit the following:

- (1) Currently this land is zoned A2 for general agriculture and converting it A2-sp is not the best use for agriculture lands. There is a recent public decision where a wedding venue application was rejected by both Township and County Councils based on the use of agriculture land is for agriculture. Blandford Blenheim is largely an agriculture Township and promotes this. There is no benefit for the destruction of further agriculture land for this crematorium, it will not create many jobs and only benefit a few.
- (2) Increased traffic. As this will be a large incinerator it is expected that a larger number of trucks will be using county rd. 29 and possibly Blandford Rd, which is governed by the half load bylaw as such with its proximity to a busy intersection a possibility of increased motor vehicles accidents can be expected. This intersection and roadway was not designed to handle large volumes of traffic including increased commercial vehicles. Commercial properties when being developed take traffic into consideration when being developed. No traffic study has been undertaken.
- (3) A water course runs through the above property and directly empties into the Thames River, which could potentially carry harmful toxic waste and pollution downstream into the food chains through local crop irrigation and other human uses, affecting thousands of people.
- (4) A concern over handling of dead carcass, especially in large quantities may result in suspected infections being released prior to any cremations. This could have potential catastrophic consequences on local agriculture and humans for the spread of infectious diseases, for example bird flu. Many diseases are easily spread with only one interaction.
- (5) There will be increased air pollution due to the burning of gas to incinerate these animals. Although new chimneys have technology to help reduce them, currently there are no "emission free" systems that will prevent a 100% clean burn. Environmental studies by New England Anti-Vivisection Society # ISSN 2076-3298 describe infected animals/animals treated with certain experimental medications, can release these gases into the atmosphere by the burning of said animals. The potential to release harmful chemicals such as Nitrogen Dioxide, Sulfur Dioxide, organic compounds are just a few the study has identified: Section 4.1 of accompanying document from the Review of Evidence of Environmental Impacts of Animal Research and Testing provides evidence to support this claim. There is no evidence to suggest chemicals that had been injected into affected animals either for treatment or testing will not be released into the atmosphere or will be destroyed by burning the animal.
- (6) With very limited government control/monitoring there is a potential to import diseases/infections from various parts of the country for incineration, increasing the potential to human and animal health. It is unlikely that only animals from Oxford County



will be allowed due to the size of this operation. There is no mention on how any Government Agency will monitor this operation, and there is limited Legislation for this. Smaller operations with infected/diseased animals will likely just transport the animals themselves or outsource it to a private nonhazardous material trained outfit. This area of Oxford County is a major agricultural area, sensitive to disease and infections.

- (7) Other pollution is possible into ground water and soil due to poor handling/accidents or even prolonged usage of this facility increasing health concerns for local residents and agriculture.
- (8) Section 21.2.1 Biosafety Handbook issued by the Government of Canada states that: there are local farms that may be impacted by the use of an incinerator. Infected animals will be transported on our highways from areas outside Oxford County, a greater risk to this area would occur as these infected animals are transported through the area. With close proximity to the Village of Innerkip and Drumbo, the spread of infectious disease could happen.
- (9) There is no long term environmental studies, no exposure risk assessments, or even a hazardous/infectious materials handling report submitted for public review.

Conclusion: I currently live approximately 2km west of this location and generally with the prevailing westerly wind, down wind of this potential operation. I also have a well that supplies myself and my family with drinking water that I don't want to have contaminated with substances that could cause short- or long-term health problems, either by the release of contaminates into the air, soil, or ground water(local food grown on nearby soils). There are other more suitable locations within the Province, that are not located in the center of a major agriculture area, that the current applicant must consider, that have undergone proper environmental studies, safety studies, traffic studies, and have resources to handle such incidents. I am available for comment should that be requested.

I thank this council for the opportunity for my concerns to be heard.

Respectfully submitted,

Dave and Lanette Robertson

786142 Township Rd 6

R.R.#2 Innerkip Ontario

NOJ 1M0



Review

Review of Evidence of Environmental Impacts of Animal Research and Testing

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Abstract: Millions of animals are used in research and toxicity testing, including in drug, medical device, chemical, cosmetic, personal care, household, and other product sectors, but the environmental consequences are yet to be adequately addressed. Evidence suggests that their use and disposal, and the associated use of chemicals and supplies, contribute to pollution as well as adverse impacts on biodiversity and public health. The objective of this review is to examine such evidence. The review includes examinations of (1) resources used in animal research; (2) waste production in laboratories; (3) sources of pollution; (4) impacts on laboratory workers' health; and (5) biodiversity impacts. The clear conclusion from the review is that the environmental implications of animal testing must be acknowledged, reported, and taken into account as another factor in addition to ethical and scientific reasons weighing heavily in favor of moving away from allowing and requiring animal use in research and testing.

Keywords: animal research; animal testing; adverse environmental impacts; laboratory waste production; breeding; laboratory health effects

1. Introduction

Millions of animals are bred, used, and ultimately disposed of potentially as pathogenic (*i.e.*, capable of causing disease, such as bacteria, fungi, and protozoa) or hazardous waste, in research and

toxicity testing, including in drug, medical device, chemical, cosmetic, personal care, household, and other product sectors. As with other large-scale uses of animals such as the farm animal industry, which rears and slaughters more than 50 billion land animals every year [1,2], this large number of animals used and disposed of in research and testing, and the associated use of chemicals and supplies, raises serious concerns about the overall environmental impact of using animals in this capacity. Estimates for global annual use in research and testing are variable, with the most comprehensive estimates ranging from 115.3 million to 126.9 million non-human vertebrate animals. Both estimates are considered conservative [3,4]. The U.S. uses the most animals in research and testing in the world [3]. In 2012, facilities in the U.S. reported to the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS), the government agency responsible for regulating the use of animals in research and testing, that they used more than 875,000 animals in research and testing and held an additional 143,400 animals for breeding or future use (Numbers calculated from facility annual reports available at [5]).

Research facilities, however, do not report the number of cold-blooded animals, farmed animals used in agricultural research, or rats, mice, and birds bred and used for research. Together, these species, while unreported, constitute the vast majority of animals (an estimated 95%) used in research [6–9]. A 2000 USDA survey estimated that 31–156 million animals (species required to be reported as well as those excluded) were actually used in the U.S. [3,10]. Further, the use of animals is believed to have increased since this survey was done due to the increased use of genetically modified (GM) animals and the introduction of large-scale chemical testing programs [4,11]. A 2004 report estimated that the number of mice alone used annually in U.S. laboratories is 100 million due to the significant growth in use of GM mice [10].

The number of animals used in research and testing is believed to be growing due in part to the development of GM mice. The creation of GM mice has inherent scientific flaws which lead to significant waste in the form of animals bred which are not actually used in research or testing, and instead become waste or unusable industrial by-products. For example, the majority of mice progeny may not have the trait or deformity the researchers desire, have unintended deformities, or have the planned deformity but are still determined to not be useful for the intended purpose. As a consequence, these animals are killed and their bodies disposed of into the environment in one form or another [11,12]. The number of animals euthanized in the production of GM models is not required for reporting purposes and, thus, not publicly available, making it difficult to quantify the volume of surplus animals destroyed [13]. The loss of life and waste generated is staggering due to the requirements of developing and maintaining a GM mouse. In one report, a medical school euthanized 33,348 of their 55,435 laboratory mice as surplus, and another facility in the United Kingdom “screened 26,000 mice and recovered 500 usable ‘mutants’” [11]. Given this, an enormous number of animals must have been used to develop the thousands of different mouse strains in the U.S.

According to the U.S. National Institutes of Health Office of Laboratory Animal Welfare (OLAW), “A research animal facility generates a significant amount of waste that must be removed and disposed of on a regular, frequent basis” [14]. This waste and resulting environmental consequences have not been adequately addressed. At a fundamental level, records regarding the total number of animals used in research are not reported to or required by the USDA, making an environmental analysis difficult. However, it is clear that a staggering number of animals are used and discarded, or simply

discarded without being used because they are determined to be excess or develop a laboratory-acquired disease not being studied. This fact compels the need for an environmental analysis of the biomedical, cosmetic, and product industries' animal use.

While there are few specific studies on the environmental consequences of animal use in research, evidence demonstrates that their use and disposal, and the associated use of chemicals and supplies, contribute to pollution as well as adverse impacts on biodiversity and public health. The objective of this review is to examine such evidence. The review includes examinations of (1) resources used in animal research; (2) waste production in laboratories; (3) sources of pollution; (4) impacts on laboratory workers' health; and (5) biodiversity impacts. Awareness of these environmental impacts is necessary to fully examine the use of animals in research and testing, especially given the lack of regulatory mandate to fully account for all animals used in research and testing and to employ non-animal testing methods whenever available.

2. Resources Used in Animal Research

2.1. Animals

As described, millions of animals are used in research and testing, but because the Animal Welfare Act does not cover the vast majority of animals used, total numbers are not reported to the USDA. Here, to get an idea of the scale of animal and resource use, we examine their use in toxicity testing. Toxicity tests are conducted on animals in an attempt to demonstrate the safety and efficacy of drugs and certain chemicals. A standard series of toxicity tests may use upwards of 6000 to 12,000 animals and take years to complete [15,16]. To put this in perspective, while there were approximately 82,000 chemicals in commerce in 2005 and 700 new chemicals introduced each year [17], it took 30 years and \$2 billion to screen 300 chemicals using traditional animal toxicity tests [18]. In contrast, as part of the Environmental Protection Agency's new ToxCast program it took about five years to test 300 chemicals using 600 different rapid, automated *in vitro* tests with equal or greater predictive value [18]. Toxicity tests are often conducted in rats, mice, rabbits, or dogs, with at least three groups of animals receiving a test drug or chemical and another group serving as the control. The numbers of animals used varies depending on the type of test being conducted. For example, the number of animals per group ranges from 10 rats in 28-day toxicity studies to 20 rats per group in sub-chronic studies to 100 rats per group in combined chronic toxicity and carcinogenicity assays, which last for a minimum of two years. For developmental and reproductive studies, the litter is considered the experimental unit, and at least 20 litters per group are required. Animals used in toxicity tests may be held and dosed with chemicals or drugs for months or years [19].

As another example of the resource intensity of animal testing, compare two methods of carcinogenicity testing. In the *in vivo* (animal) method, carcinogenicity bioassays are conducted with rodents, typically rats and mice, for a minimum of 24 months (rats) and 18 months (mice) [19], and uses at least 400 animals [19]. In contrast, the U.S. National Cancer Institute (NCI) drug discovery and development arm (the Developmental Therapeutics Program (DTP)) has developed and implemented non-animal testing methods for carcinogenicity, anti-HIV drug efficacy, and certain categories of cell toxicity. For example, a panel of 60 human tumor cell lines (DTP Human Tumor Cell Line Screen)

is used to identify compounds with anti-tumor effects. NCI developed these methodologies in the late 1980s because of its dissatisfaction with the poor predictability of animal testing in these areas—concluding that “persistence in the effort (to develop the methodologies) reflected dissatisfaction with the performance of prior *in vivo* primary screens” [20].

2.2. Energy

The quantity of energy consumed by research animal facilities is up to ten times more than offices on a square meter basis [21]. Animal research facilities require total fresh air exchanges for ventilation, using large volumes of air, resulting in a high consumption of energy and carbon emissions [21]. Increased energy utilization is observed as airflow exchange in a standard laboratory is up to 12 air exchanges per hour (ach), compared to an animal research facility that can be up to 20 ach [21]. Additional energy demands are due to the environmental and space needs of the animals, barrier protection from outside pathogens, indoor air quality, lighting, and the requirement for power intensive equipment in research [22]. Forty to fifty percent of energy consumed in the research animal facility is attributed to ventilation and an additional 10%–30% of energy consumed is used to chill air or water for cooling spaces and equipment [21].

2.3. Chemicals

A vast array of chemicals is involved in every step of animal research and testing, including chemicals for sanitation, disinfection, sterilization, animal care, and research and testing procedures. The Occupational Health and Safety Act (OSHA) helps protect laboratory workers by regulating the handling and disposal of hazardous chemicals, as well as other toxic, infectious, mutagenic, and carcinogenic agents [23]. However, OSHA is not responsible for alleviating the greater environmental impacts from the generation and disposal of these chemicals and agents.

Similar to other testing methods, animal research and testing involves the use of many toxic substances, including irritants, corrosive substances (e.g., bromine, sulfuric acid, hydrogen peroxide, chlorine, ammonia, chloramines, nitrogen dioxide, sodium hydroxide, phosphorus, phenol, nitric acid, sulfuric acid, hydrochloric acid, ammonia, phosphorus pentoxide, and calcium oxide), asphyxiants (e.g., acetylene, carbon dioxide, argon, helium, ethane, nitrogen, methane, carbon monoxide, hydrogen cyanide, and certain organic and inorganic cyanides), neurotoxins (e.g., mercury, organophosphate pesticides, carbon disulfide, xylene, tricholoroethylene, and *n*-hexane), reproductive and developmental toxins, and carcinogens. In addition, flammable, reactive, and explosive chemicals are used in such research [24]. Animal research laboratories also use a number of chemicals with unknown hazardous and carcinogenic properties. Animal testing may involve the use of these chemicals for longer time periods ([17], p. 40), in larger quantities ([17], p. 40), or for more functions than non-animal testing methods due to the length of some animal tests, numbers of animals that are used, or the use of chemicals for purposes extraneous to the research. Chemicals are used in laboratories with animals for testing, research, veterinary care, analgesia, anesthesia, euthanasia, and necropsy. The OLAW Institutional Animal Care and Use Committee (IACUC) Guidebook notes that due to these chemical uses, hazardous chemicals may be present in feed, feces, and urine ([14], p. 141).

Finally, large amounts of chemicals also are used to maintain sanitized or sterile environments in laboratories with animals. For example, some facilities use chemical decontamination to kill infectious diseases such as hepatitis B or C after a study on animals [24]. According to OLAW's IACUC Guidebook:

In general, enclosures and accessories (e.g., cage tops) should be sanitized at least every two weeks. Solid bottom cages, water bottles and sipper tubes should usually be sanitized weekly. The supply lines of automatic watering systems should be flushed and disinfected on a regular basis ([14], p. 48).

This variety and frequency of chemical use is in addition to any chemicals actually being tested. Because many animal tests, such as chronic toxicity and carcinogenicity, are long-term studies, chemicals may be used for extensive lengths of time.

3. Waste Production in Laboratories

Millions of animal bodies, many of which are contaminated with toxic or hazardous chemicals, viruses, or infectious diseases, and significant amounts of other laboratory waste such as animal excrement, bedding, excess feed, caging, needles, syringes, and gavages, are discarded after use in research and testing every year.

The animal research industry also regularly and routinely must dispose of large amounts of hazardous wastes. Similar to incineration in other industries, animal research facilities emit many harmful substances, including ignitable, corrosive, reactive, and toxic wastes, and air pollutants such as nitrogen dioxide, sulfur dioxide, particulate matter, and carbon monoxide (for examples, see [25]). In addition, among the dozens of hazardous chemical substances, such as mercury, methane, and cyanide, handled by these facilities are known carcinogens, including benzene, arsenic, and formaldehyde, and possible carcinogens, including lead, DDT, and chloroform.

Carcasses, as well as other laboratory waste, may not be hazardous or infectious due only to exposure of the animals to diseases and chemicals, but may contain a combination of chemical, radioactive, and/or biological hazards. For example, animal tissue that contains a radioactively labeled toxic chemical is sometimes produced in toxicological studies. The most “prominent” laboratory waste created that is both chemically and biologically hazardous is animal carcasses and tissues that contain a toxic chemical. Examples include specimens preserved in formalin or ethanol and rodents that have been fed lead, PCBs, mercury, or other chemicals in toxicity studies. Wastes that are chemically and biologically hazardous are difficult to dispose of and few waste facilities can handle them [24].

Disposal methods for these biological wastes raise additional environmental concerns. Carcass disposal methods include rendering, landfill disposal, and incineration [26]. Incineration is the preferred method for managing radioactive animal carcasses and tissue [24], the method recommended by OLAW for disposal of contaminated feed and bedding [14], and the most common disposal method for U.S. laboratories [24]. Many facilities maintain incinerators on their property, while other facilities contract with commercial disposal companies [26].

4. Sources of Pollution

4.1. Air Pollution

Air pollution is produced by the emission of gases and particulates resulting from incineration of animal carcasses and laboratory supplies such as animal bedding that may contain experimental chemicals, drugs, and other toxins. The resulting release of toxic substances is due to processes common to all industries as well as to toxins specifically produced by incineration of animal carcasses. Incineration is an environmental concern due to fuel consumption to maintain required temperatures, the disposal of ash from incineration in landfills, and resultant air pollution.

Environmental groups have concluded that incineration is not environmentally sound [27,28]. Incineration is known to release toxic wastes containing dioxin, mercury, lead, and other harmful substances into the air as waste is burned, to emit particle pollution, to produce toxic ashes, and to contaminate local soil and vegetation [27,29,30].

Although for this review it was not possible to determine the percentage of incinerated waste from animal research and testing *versus* other industries, and the percentage may be smaller than other industries, it is important to address the fact that animal research and testing contributes to the negative environmental effects of incineration. In addition, according to the National Research Council (NRC) Committee on Health Effects of Waste Incineration:

Although emissions from incineration facilities can be smaller than emissions from other types of sources, it is important to assess incinerator emissions in the context of the total ambient concentration of pollutants in an area. In areas where the ambient concentrations are already close to or above environmental guidelines or standards, even relatively small increments can be important [31].

Incineration is extremely adverse to human health. A study in Taiwan demonstrated that stack gases from animal carcass incinerators contain higher concentrations of toxic heavy metals than standard medical waste incinerators, including iron, copper, zinc, lead, nickel, and manganese [32]. When a carcass which has accumulated heavy metals from research or testing is incinerated, the metals gather in the bottom ash in the incinerator, release into the atmosphere, or collect in the pollution control devices [32]. Polycyclic aromatic hydrocarbons (PAH) are also emitted in animal incinerator stack gases, with one study reporting the concentrations of the most carcinogenic PAH compounds to be 4.6–7.6 times greater than in standard medical waste incinerators [33]. PAHs are toxic, and epidemiological studies have shown PAHs to be carcinogenic [34]. They are persistent in the environment, and the most common way humans are exposed to them is by breathing contaminated air [35]. Incineration of animal carcasses also has been associated with ash barium levels exceeding accepted standards [26]. The EPA states that barium can “potentially cause gastrointestinal disturbances and muscular weakness resulting from acute exposures” and “has the potential to cause hypertension resulting from long-term exposures” [36].

People living in communities near incinerators of all types are potentially exposed to chemicals through the air or contact with the soil. Epidemiological studies have shown the health hazards, including bronchitis and decreased life expectancy, posed by exposure to air contaminated by incinerator

waste [29]. Some pollutants, such as dioxins, furans, and mercury, are “persistent” chemicals that can be carried long distances in air, land, and water and affect distant areas from the incinerator [31]. According to the NRC Committee, “Pollutants emitted by incinerators that appear to have the potential to cause the largest health effects are particulate matter, lead, mercury, and dioxins and furans” [31]. In addition, toxins such as mercury are known to have the ability to cause significant neurological damage and birth defects, resulting in developmental delays and cognitive defects [27].

In addition to global warming pollutants, incineration releases gases, such as sulfur dioxide, carbon monoxide, and nitrogen oxide, that can cause or exacerbate respiratory and cardiovascular diseases such as asthma, bronchitis, heart attack, and stroke [29,37–39]. These emissions also decrease resistance to infections and, importantly, contribute to smog, acid rain, and ozone formation [40,41]. Exposure to airborne particulate matter is associated with increased risks for asthma, hypertension, stroke, and cardiac diseases [37,42], as well as increased mortality [42,43]. Incinerators of all types emit particulate matter into the atmosphere, which can increase the incidence of respiratory infection, reduce the volume of air inhaled, impair the lungs’ ability to use that air, increase the risk of myocardial infarction, and increase the risk of other serious health problems [28,44]. A recent study found that 2.1 million deaths have been associated with fine particulate matter resulting from human activities [45].

4.2. Water Pollution

Soil contamination and runoff of animal waste and other debris related to drug and chemical testing may result in ground water contamination. Animal waste containing drugs and chemicals that may have unknown toxicities due to their experimental nature exacerbates the growing problem of drugs in public water supplies. A 2002 study by the U.S. Geological Survey found that 80% of sampled rivers and streams contained one or more pharmaceuticals [46], which could originate from the animal agriculture, medical, or research industries.

Public drinking water supplies are contaminated by animal testing because public water treatment facilities often cannot filter out drugs, hormones, and chemical solvents in wastewater (for references, see [47]). Similar to what occurs on a larger scale with pollutants in the animal agriculture industry, these potential toxins may then be carried in to surface water, groundwater tables, and public drinking water supplies [47,48]. There are related serious biological consequences for aquatic animals, and potentially serious health effects for humans, from the presence of antibiotics, endocrine disruptors, cytotoxic cancer drugs, and other drugs in lakes, rivers, streams, and drinking water [49,50]. For example, a 2006 study evaluated the effects of a mixture of drugs designed to mimic river and treated waste water content on human kidney cells, and found that cellular proliferation was reduced 10%–30% compared to control cells [51].

4.3. Soil Contamination

Incinerator residues and water runoff from animal testing facilities may result in soil contamination. Several studies have shown increased levels of heavy metals, dioxins, and polychlorinated dibenzofurans in the soil near incinerators [52–54]. The specific dioxin 2,3,7,8-TCDD, a byproduct of incomplete combustion, is an extremely toxic chemical, and according to International Agency for Research on

Cancer (IARC) a definite human carcinogen [55]. Animal incinerator soil contaminants in bottom ash and fly ash also include calcium, phosphorus, and potassium, which can have toxic effects [56].

5. Impacts on Laboratory Workers' Health

5.1. Laboratory Animal Allergy

The environmental hazards associated with animal research have direct implications on human health. Animals in laboratories are often tightly packed in rooms without outdoor access and dependent on modern air filtration systems. Laboratory animal allergen exposure and the subsequent development of an allergic reaction and asthma remains an important occupational health and environmental safety risk for all personnel involved in the care and use of animals [57–63]. Laboratory animal allergy (LAA) has been formally recognized since 1989 as an occupational hazard by The National Institute for Occupational Safety and Health in the United States. In Great Britain, worker exposure to laboratory animals has been defined as one of the most common causal agents for occupational asthma [64] and has been documented by the Surveillance of Work-related and Occupational Respiratory Disease (SWORD) project since 1989.

Laboratory animal allergy is the collective term used to describe symptoms that may include allergic conjunctivitis, rhinitis, asthma, and dermatological reactions resulting from exposure to animal allergens. Most laboratory animal species have multiple allergen sources that are found in hair, dander, urine, saliva, and serum [65–68]. Inhalation of airborne allergen particles is the principle route of exposure with additional incidence resulting from direct skin and eye contact [67,69]. Percutaneous exposure from animal bites and needles contaminated with animal protein have been documented and may result in systemic allergic reactions such as anaphylaxis [70].

In the U.S., it is estimated that 40,000 to 125,000 individuals are exposed to laboratory animals [71]. The prevalence of work related allergic reactions ranges from 11% to 44% in exposed workers [72,73]. The prevalence of occupational asthma as a result of exposure to laboratory animal allergens ranges from 4 to 22% [72]. Comparatively, overall, about 2 million people work in environments in which they have constant contact with animals or animal products. Approximately 33% of these workers have allergic symptoms, and 10% have symptoms of animal-induced asthma [67].

Laboratory animal workers who are in direct contact with animals are at greatest risk of developing LAA. Indirect exposure may also result through the transfer of animal allergens from the animal facility to the home or general public and has been linked to increased sensitization to animals among children whose parents are occupationally exposed to animals in laboratories [60,74].

Exposure to laboratory animal allergens is an environmental hazard and occupational safety concern that can be eliminated by replacing the current predominance of animal research and testing with *in vitro* alternatives.

5.2. Waste Anesthetic Gases (WAGs)

Waste anesthetic gases (WAGs) are gases and vapors that can leak into the breathing zone and environment of laboratory personnel during medical procedures. Inhalation of WAGs has been associated with both acute and long term chronic effects. Acute symptoms include drowsiness, headaches,

irritability, depression, dizziness, nausea, and neurobehavioral effects. Increased incidences of neurologic and reproductive dysfunction, hepatic and renal toxicity, and neoplasia have been linked to chronic low-level exposure of health care professionals [75]. Nitrous oxide and halogenated anesthetics such as isoflurane are commonly used in animal research facilities and pose an unnecessary environmental health risk in the workplace. The occupational health hazard for personnel working with animals in laboratories is potentially elevated due to facilities performing anesthetic procedures in small, multi-user rooms; the presence of many different portable anesthetic gas delivery systems complicating routine maintenance, gas scavenging, and atmospheric monitoring; and prolonged exposure to WAGs during experimental procedures for large treatment groups [75]. The United States Occupational Safety and Health Administration does not have standards that specifically address waste anesthetic gases, however, the National Institute of Occupational Safety and Health has recommended that halogenated anesthetic exposure not exceed 2 parts per million (ppm) on a time weighted average. According to one study examining WAGs in laboratory animal facilities, intermittent staff exposure to isoflurane emissions at concentrations exceeding 5 to 10 ppm is likely [75]. In many animal research laboratories, isoflurane is the preferred gas anesthetic [76].

5.3. Laboratory Acquired Infections (LAI)

Zoonotic disease transmission in an animal research facility is an occupational safety and health risk affecting laboratory animal handlers. Laboratory acquired infections (LAI) can occur through direct contact with the animals or indirect contact by means of contaminated tissue, equipment, and supplies. The primary mode of transmission is air borne through aerosolization of infectious material with additional exposure risks from animal bites, scratches, exposure to contaminated equipment, and accidental ingestion of contaminated material [77]. The American College of Laboratory Animal Medicine classifies macaques, pigs, dogs, rabbits, mice, and rats as the most common species used in research animal facilities that are established or potential hosts for zoonotic disease [78]. Ringworm, Q fever, cat scratch disease, ectoparasites, and simian foamy virus represent a small number of zoonotic diseases in which confirmed cases have been reported in recent years and it is speculated that overall disease incidence is underreported [79]. One study estimated the annualized incidence rate of zoonotic disease transmission from laboratory animals at 45 cases per 10,000 worker-years, a rate comparable to nonfatal occupational illnesses for full time workers in the agricultural production-livestock industry and for those employed in the health services industry [79].

In documented cases of zoonosis in animal research facilities the severity of LAI ranges from asymptomatic to death [79]. Case examples of LAIs in animal research facilities have been recently reported including a deadly outbreak of respiratory illness in a colony of titi monkeys at the California National Primate Research Center that was transmitted to a researcher in May 2009 [80]. The adenovirus responsible for the outbreak is a novel strain known as titi-monkey adenovirus (TMAdV) that resulted in 23 of 65 monkeys developing symptoms with an 83% mortality rate [80]. A researcher at the facility who had close contact with the infected colony developed flu-like upper-respiratory-tract symptoms, including pneumonia, shortly thereafter and a family member of the researcher also acquired the illness; both recovered and tested positive for antibodies to TMAdV providing strong evidence of cross transmission from the monkeys to the researcher [81]. In more severe circumstances, death has

occurred due to laboratory acquired infections in research animal facilities. In 1997 a primate researcher at Yerkes Regional Primate Research Center was infected with herpes B following exposure to a drop of body fluid from a rhesus monkey [82]. The researcher died six weeks following the exposure to herpes B, a virus common in primates but rare in humans. In humans, it has a 70% mortality rate [83].

6. Biodiversity Impacts

6.1. Capture from the Wild

We are in an era of unprecedented threats to biodiversity. The current loss of species is estimated to be 50 to 500 times higher than the natural background rates found in the fossil record [84]. Tens of thousands of monkeys have been captured from the wild and transported to research facilities in the U.S. and other countries over the past few years [85]. This alarming fact raises not only animal welfare concerns but also population and biodiversity concerns. Population data for many species of monkeys traded for research are lacking. According to Ardith Eudey of the World Conservation Union Primate Specialist Group, “Macaques (the most commonly used monkey in laboratories) frequently are considered as well known or common: as a consequence, data on the present status of populations such as numbers, distribution and population trends are deficient for most species, especially those that are widespread geographically...” [86].

In 2008 Eudey expressed concern that the long-tailed macaque (*Macaca fascicularis*), a species of monkey commonly used in animal research, population was rapidly declining in the wild [87]. Although most traded long-tailed macaques are reported as being captive bred, Eudey and non-governmental organizations suspect that the export of wild-caught monkeys continues, using false permits [86]. Thus, it is suspected that claims of captive breeding are hiding increased numbers of wild-caught monkeys. In addition, breeding farms continue to obtain long-tailed macaques from the wild [88].

The World Conservation Union Red List currently lists the international trade for laboratory research as a threat to the continued existence of the long-tailed and rhesus macaques [87,89]. Regarding the rhesus macaque, it states, “Confiscation for laboratory testing is a mostly localized threat, but it is considerable in certain areas... Capture and release of laboratory and ‘problem monkeys’ from rural and urban areas into natural forests is a major threat to wild macaques” [89].

In 2012, 17,915 non-human primates were imported into the U.S. [85]. The vast majority, 15,110, were long-tailed macaques, also known as crab-eating macaques. More than 1000 rhesus macaques and green monkeys each were imported. 55.9% of the monkeys imported originated in China, 18.4% in Mauritius, 8% in Cambodia, 7.9% in Vietnam, 6.4% in Saint Kitts and Nevis, 1.3% in Indonesia, and 0.62% in Guyana. Research facilities are the largest importers of primates [85]. While Fish and Wildlife Service documents indicate that 7.8% of primates imported are wild-caught and 26.1% were born to parents who were wild-caught [85], there are reports of falsified documents indicating that the monkeys were captive-bred when in fact they were not.

Of further note, the trade in monkeys for research and testing raises concerns about the growth and spread of dangerous pathogens. Animals are exposed to conditions of over-crowding, extreme

temperatures, and unsanitary conditions. In these conditions, animal diseases are common, resulting in “ideal conditions for pathogens to multiply” [90].

6.2. Genetically Modified Animals

The development and proliferation of GM animals in research facilities raises concerns as to the impact these animals could potentially have on the environment and indigenous populations if they are released or escape. In 2002 the National Academies’ National Research Council expressed these concerns in a formal report requested by the Food and Drug Administration. In the report the committee concludes that the potential for GM animals escaping and interbreeding with or out-competing wild populations is the primary concern with advances in animal biotechnology [91]. This concern is further expressed in an article regarding the welfare of GM animals. The author states, “If animals whose genome has been altered by the stable introduction of recombinant DNA in the germ line should escape and breed with feral populations, the environment could be altered and a disastrous situation might be created” [92].

7. Conclusions

Record-keeping and regulation of all environmental aspects of animal research and testing are extremely limited or non-existent. At a fundamental level, rats, mice, and birds must be covered under the Animal Welfare Act in order to begin recording the scope of animal use. Although records and studies are limited, this review attempts to elucidate areas of environmental concern. Further areas of environmental concern necessary to address include:

- The use of animals, and associated chemicals and supplies, in research and testing, and their disposal into the environment on an international level. Many animal research companies based in the U.S. have labs in other countries, including China, the Philippines, and India.
- Research and testing involving injecting or exposing animals to radioactive materials creates radioactive carcasses, feces, urine, blood, and other wastes with additional environmental concern. In addition, working with animals who have received radioactive material presents a risk to workers in labs.
- Large scale killing of animals used in research or bred for future research due to disease, facility resource constraints, funding limitations, and research demands are further examples of waste and animal disposal concerns found in the animal research industry.

While industries such as those involved in animal agriculture and energy production have a larger contribution to the negative environmental impacts discussed in this review, it is important to address the impacts of all industries and to discuss all methods to alleviate them. Animal research and testing uses more than 100 million animals every year, contributing to air, water, and soil pollution, public health concerns, and biodiversity concerns. In addition, there are a multitude of alternative testing methods.

Non-animal methods have the inherent advantage of sparing significant numbers of animals from the pain and distress commonly associated with laboratory life and use, a goal consistent with public opinion polls [93–95]. Additionally, non-animal methods are often less costly and less time-consuming

to perform and promise faster delivery of test results with greater applicability to humans [17]. For all of these reasons, industry, government agencies, and other stakeholders must in due diligence consider the environmental impacts of animal testing and research in deciding whether to require the use of non-animal alternatives whenever available.

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Author Contributions

Katherine Groff designed the review, conducted research, and wrote the main manuscript. Eric Bachli conducted research and conceived of and wrote the sections of the review on the impacts on laboratory workers' health. Molly Lansdowne conducted research. Theodora Capaldo conceived of the review and contributed to the editing process. All authors discussed the results.

Conflicts of Interest

While preparing this manuscript, the authors were employed by NEAVS, whose mission is to end the use of animals in research, testing, and science education.

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From: [Planning](#)
To: [Planning](#)
Subject: Subject: File No. OP 25-08-I and ZN 1-25-05, Owners Matthew and Jacklynn Bowcott - Applicant Zelinka Priamo Ltd.
Date: Tuesday, September 9, 2025 4:00:32 PM

September 9, 2025

Attention: Dustin Robson
Development Planner - County of Oxford
P.O. Box 1614, 21 Reeve St., Woodstock, Ontario
N4S 7Y3

Letter of Concern

We are writing this email as new residents of Innerkip (1 1/2 years) and to express our concern over a proposed zoning amendment (OP 25-08-I and ZN 1-25-05) and the application to build an animal/industrial size crematorium (10,000 sq ft) within 1 km of our residence.

The concerns we have for this project are as follows:

- **Precedent:** Approving and changing the zoning in an agricultural zone will open doors for future non-agricultural industry.
- **Public health and Air Quality:** Emissions from proposed stack (which has not been shown on the drawings but has been advised there will be one) Also odours with the cremation process given the proximity

to homes, schools, conservation areas. Latest technology within the facility is only as good as the operation of the equipment, age of equipment and maintenance of the facility

- **Traffic:** Increased traffic in area, especially the driveway into the crematorium on Blandford Rd. (between two residences) We are assuming there will be larger transportation vehicles due to the drive thru and 14 ft door at the back of the facility

- **Disposal of bi-product:** What will be the process of disposing of the bi-product? Where will it be disposed of? Facility is right beside a creek bed, what system is in place for waste water?

- **Environmental Issues and Impact:** The proposed site is surrounded by conservation land. Even though the plans show the required variance, the emissions and additional activity/noise/traffic will effect

the natural habitats of the wildlife in that area.

- **Property Values:** What will be the impact of property values in our area?

We moved to this area for a quieter lifestyle and its agricultural presence, so to hear that this zoning change to industrial is being considered is very disheartening.

Thank you for your attention to this matter. I trust that the County will prioritize the health and well being of the residents.

Milan & Patricia Sokic
23 Elisabeth St
Innerkip, ON N0J 1M0

From:
To: Pet crematorium
Subject: Tuesday, January 6, 2026 12:33:39 PM
Date:

Dear Mr. Robson,

I have some concerns regarding the proposed change of farmland to accommodate the pet crematorium. I attended the last public meeting and there were some valid points raised.

1. The environmentalists stated that noise and emissions were within the acceptable limits. My own personal opinion is that any at all are too many. Depending on the health concern none is the only acceptable level for emissions. I am an avid window cleaner, I know how stuff flies. If it is on my windows I am breathing it in.
2. The proximity of the crematorium to the water is another concern. We drink and clean with this water. What recourse does one have if something were to accidentally happen?
3. Why is this not being put in an industrial area where it belongs. It was implied that there was industrial land available for this. Why is it not being built there?
4. The environmentalists that are giving their reports are they willing to put their names and credentials on the line if the unforeseen were to happen. What recourse would one have?

This decision impacts a lot of people, their health, their property values hopefully not the wells in the area or trout lake as was mentioned at the last meeting, but only time will tell.

Thank you,
Sandra Sonneveld
15 Harwood St.
Innerkip, On
N0J 1M0

Sent from my iPad

Dustin Robson-
Development Planner
Community Planning
County of Oxford
519-539-9800 ext.3211
planning@oxfordcounty.ca

Re: File No: OP 25-08-1 and ZN 1-25-05
Owners: Matthew and Jacklynn Bowcott
Applicant: Zelinka Priamo Ltd.

September 25, 2025

Hi Dustin,

I have been trying to think of what to write in my letter and my concerns about the proposed zone change and official plan amendment for the Animal Crematorium. We moved to Innerkip from an area with an Industrial park a kilometer or so away. If the windows were open at night you could hear the buzz off the park. I can't imagine all the different noises that will be coming from a factory of this magnitude (10 000 Sq. Ft.) and within a stones throw of my back door.

After being here since 2011 and enjoying the peace and serenity of the Innerkip country mornings where you step outside and can hear a pin drop in the dead silence or in my case the sound of the car tires going down the road and hearing the click click as the vehicle goes over the bridge into or out of town, sometimes you can even hear the golfers yelling "4".

My concerns are genuine and based on the short and long term effects on human and wildlife health resulting from the noise, particles/emissions, odors and disease present from deceased animals whose carcasses/ashes/remains are associated with an animal crematorium/factory of this nature.

Please help save our community and farm land to be free from Industrial development.

Mike Steeves
775810 Blandford Road
Innerkip, ON

From:
To: [Planning](#)
Subject: File no: OP 25-08-1 and ZN 1-25-05 Owner: Matthew & Jacklynn Bowcot Applicant: Zelinka Priamo Ltd.
Date: Sunday, September 28, 2025 12:24:38 PM

Jackie & Ralph Tamming
775703 Blandford Rd.
Innerkip, ON
NOJ 1MO

File No: OP 25-08-1 and ZN 1-25-05
Owners Matthew and Jacklynn Bowcot
Applicant: Zelinka Priamo Ltd.

To Dustin Robson,

First of all I would like to tell you a little about our wonderful rural/farming community of Innerkip, we are a small village with a beautiful caring community. We care about the landscape, we pride ourselves on keeping our properties clean and tidy, this Crematorium/factory really goes against everything that is built here, it needs to be built in an industrial/commercial area, somewhere like Woodstock where the owners already own a Veterinary Clinic.

As someone who has been involved in the Veterinary field for over 25 years I believe this crematorium is going to impact our environment, as a pet owner too the awareness of the environmental complications could follow our decisions for their aftercare.

There have been some developments in a more sustainable cremation process. Water based cremation, also known as alkaline hydrolysis, significantly reduces the environmental impact and uses less energy. Newer environmental systems feature some advancements to ensure environmentally compliant emissions.

But this being said, why should this factory be allowed in this small rural/farming community, where there are fields of crops, farming animals, produce selling and also what about well water concerns, not just for the residents of today but for the future generations to come.

We all have a hard time picturing in our beautiful countryside a building 10,000 square feet, exhausts of 49 feet high, in addition 24 parking spaces and a drive thru, an outdoor memorial garden may sound beautiful but all of this will increase the traffic on an already busy country road, the increase of all types of cars and trucks over the last few years has more than doubled, especially when there is a problem on the main highways around here, we have lineups of heavy trucks, this is a danger to the public and to the families that live on this road who can't already bike or walk without fearing of an accident. Not only a danger but this road has weight restrictions in the winter.

I would like to ask if the governing body, the CVO for all Veterinarians has been consulted if this would be a conflict of interest, a Veterinarian operating a crematorium could be seen that way.

I would also like to ask if there has been any kind of road survey done on Blandford Road, the impact of more traffic could be dangerous to the public and the busy farmers who constantly use this road for access to their crops.

In closing we are 100% against this crematorium being built in this location.

We are interested in receiving a copy of staff reports and notices of decision regarding these applications.

Thank you for your time.

Yours sincerely

Jackie and Ralph Tamming.

Letter of Concern

Kathy Hastie
68 Captain McCallum Dr.
New Hamburg, ON N3A0B6

2025-09-06

Dustin Robson,
Development Planner
County of Oxford
P.O. Box 1614, 21 Reeve St.
Woodstock, ON N4S 7Y3

**Subject: File No. OP 25-08-I and ZN 1-25-05. Owners Matthew & Jacklynn Bowcot
Applicant Zelinka Priamo Ltd.**

Dear Mr. Robson,

I am writing as the daughter of long-time residents of Innerkip, and as a former resident myself, to express my concerns regarding the proposed zoning amendment (File No. ZN 1-25-05 & OP 25-08-I) and the related application to construct an animal crematorium within two kilometres of residential properties in our community.

While I understand the County's responsibility to evaluate applications that may support business development, I urge you to carefully consider the potential impacts this project could have on nearby residents and the character of our rural community:

- **Public Health and Air Quality:** Emissions and odours associated with cremation processes may adversely affect local air quality, particularly given the proximity of homes, schools, and recreational areas.
- **Environmental Impacts:** Establishing a crematorium on agricultural land raises concerns about soil, water, and ecological health in an area that relies heavily on farming and natural landscapes.
- **Community Character:** Innerkip is a family-oriented community where residential and agricultural uses coexist. A crematorium would be incompatible with surrounding land uses and could negatively affect property values and community well-being.
- **Precedent:** Approving such a facility near residential neighbourhoods could set a concerning precedent for future zoning and land-use decisions in Oxford County.

For these reasons, I respectfully request that the County carefully weigh these concerns before making any decision on this rezoning and development application. A more appropriate location—farther removed from residential areas and community hubs—should be considered for this type of operation.

Thank you for your attention to this matter. I trust that the County will prioritize the health, safety, and quality of life of its residents in the decision-making process.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Hastie".

Kathy Hastie

Formerly of Innerkip, Ontario

September 10, 2025

Dustin Robson, Development Planner
County of Oxford
P.O. Box 1614 21 Reeve Street
Woodstock, On N4S 7Y3

File# OP 25-08-1 and ZN 1-25-05

Owners: Matthew and Jacklynn Bowcott

Applicant: Zelinka Priamo Ltd.

I have been a resident of Innerkip for 33 years and I am opposing this Official Plan Amendment and Zone change.

My property lies adjacent to the Bowcotts. This proposal, if allowed, will greatly impact the value of my property.

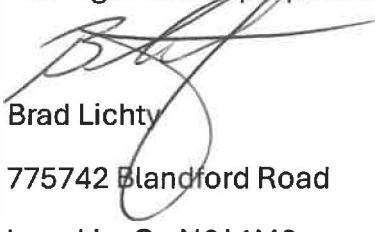
Emissions from these proposed 49' stacks will not be good for human or wildlife.

The noise, odour, toxins and vibrations from this facility will be detrimental to our well being and I believe the quality of our health will be greatly impacted.

We are so fortunate to have local farmers that supply the food we eat to myself, my family and our community. We do not want toxins from this crematorium to be contaminating our fields.

A crematorium has no business being in a residential area. This is zoned agriculture. Residents do not want this.

I am against this proposal.



Brad Lichty

775742 Blandford Road
Innerkip, On N0J 1M0

September 10, 2025

Dustin Robson, Development Planner
County of Oxford
P.O.Box 1614, 21 Reeve Street
Woodstock, On N4S 7Y3

File# OP 25-08-1 and ZN 1-25-05

Owners: Matthew and Jacklynn Bowcott

Applicant: Zelinka Priamo Ltd.

I am writing this letter in opposition to the proposed Zone change and an Official Plan Amendment for an animal crematorium.

I have concerns regarding this proposal.

My concerns: Emissions from an animal crematorium emitted into our already vulnerable environment. Particulates emitted from these facilities will be inhaled impacting air quality and respiratory health not only for human life but our precious pets and wildlife.

These 49' stacks will be emitting so many toxins into our bodies and environment impacting our ecosystem.

I have concerns for the health and well being of myself, my family, children, grandchildren, pets and future generations.

The noise, rumbling and vibrations of the furnaces will be disruptive. Our homeostasis to human life and wildlife will be compromised.

Our property value will also be affected.

We are zoned as agricultural. This is not agriculture.

I love my home, property and community. Every day I am grateful to live in a clean, quiet rural environment. I believe this will change if this proposal is allowed.

I am also interested in receiving reports and notices of decisions.

Thank you for considering my concerns.

Patti Lichtry



775742 Blandford Road

Innerkip, ON N0J 1M0

①

Dustin Robson,

Dec. 29/2025

This letter is in regards of the purposed animal crematorium by the owners Matthew and Jacklyn Bowcott

Files OP 25-08-1 & ZN 1-25-05.

Our names are Cliff and Carol Littlejohns and as previously stated we are against the purposal of said animal crematorium.

At the previous council meeting I did not voice my concerns well or at all due to a major attack of nerves.

As everyone could see I am not a public speaker.

If I may I would like to address my concerns about the site location and the building itself.

We feel the crematorium would not be a benefit to the community of Blandford Blenheim and its people.

Where the planned site will be constructed is in the midst of fourteen residences, several farms and a golf course with restaurant facilities.

These homes have been in the area for many years. The farms have been there for some, a life time.

People love their homes and had lived with little problems, fears and no major concerns. now if this crematorium is allowed it will impact everyone.

There will be constant noise of traffic

②

and as stated plans to run 24/7 eventually with four burners running.

These homes are situated directly across the highway from the site, others are all along Blandford Road on sides of planned crematorium and residences are along County Rd. 29 (including our home.) Everyone will be impacted by odors.

They claimed there will be no smell but I beg to differ.

The crematorium in Guelph mentioned there sometimes were odors when there was an excess of fur and hair being burnt; they also stated there was a smell similar to a barbecue. (Hardly an appealing thought or smell of cats & dogs being burnt.)

The crematorium in Dorchester also had odors.

We spoke with a resident who has lived ~~to the~~ for twenty-seven years in the area of the crematorium and he confirmed there was odors especially when they burnt swine.

Again all the odors and noise will hinge on the prevailing winds

The winds will affect whoever is situated in their direction of the day and climate conditions.

Many of us like to keep our windows open in the warm seasons for fresh air or sleep at night with open windows

③

Will the running of the crematorium 24/7 have an impact on our comfort we have enjoyed until now with this factory being proposed.

There seems to be a lot of West winds and South Southwest in the summer all impacting our homes.

Another point this crematorium will be a negative factor on land values.

Mr. Bowcott stated there is a stigma associated with crematoriums thus if residents wish to sell there will be less if any people who would want to live near, beside or next door to an animal crematorium running 24/7.

Is it fair to the residents of Blandford Blenheim who have lived in this area contentedly now be subjected to accept an animal crematorium built in the area where they have resided for years and deal with an Agricultural Diversification cremating primarily pets dogs and cats Agricultural ??

This will not be a positive enhancement of the community of Blandford Blenheim. One hundred and ninety people signed the petition plus many more that are opposed that number alone speaks volumes of the opinions felt by this community.

I ask the County of Oxford Planning,

(4)

the mayor and councillors of Blandford
Blenheim to hear the voices of your
constituents.

Try to imagine yourselves in the situation
we find our homes and lives in.

Would you like to live with an animal
crematorium in the midst of your daily
lives, raising your families and spending
the rest of your life in so much uncertainty
you had bought, built your home, had been
living the way you have and now people
want to put up an animal burning
place which doesn't fit into the
community. It is a kick in the pants
for everyone; expected to tolerate all of the
negative aspects all for what???

Agricultural Diversification ???

Does the burning of Cats & Dogs & pets
qualify as Agricultural Diversification?
Surely there is a better place for this factory
to be built without causing much worry
and damaging so many peoples and lives.

The Guelph crematorium is located in an
industrial section without impacting residences
Would it not serve the community better
if this Crematorium would locate in an industrial
area of Woodstock where there isn't residents and
residences being negatively impacted.

I thank you for allowing me to voice my concerns.

Sincerely
Cliff & Carol Littlejohns

Oppose Zoning Change in Innerkip, ON for Bowcott Property



Recent signers:

2 weeks ago

Taylor Gauthier • 2 weeks ago

Aleeza Sohn • 2 weeks ago

Elaine Kitchen • 2 weeks ago

Patricia Colley • 2 weeks ago

293*

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7 Supporter Voices

The Issue

Growing up in Innerkip, ON, agriculture has always been at the heart of our community. It's where families like mine—not just the Bowcotts—live, work, and build their lives. That is why I'm opposing the proposed re-zoning change for File No.: OP 25-08-1 and ZN 1-25-05, involving owners Matthew and Jacklynn Bowcott and the applicant Zelinka Priamo Ltd. The land is currently zoned A2 for general agriculture, and converting it to A2-sp is not the best use for these valuable agricultural lands.

The proposed zoning change raises several concerns for the well-being of our community:

- increase in traffic to and from the site, which will not only be disruptive but also increase the risk of accidents in our quiet area. Safety should be our priority, and this zoning change threatens that.
- potential for contamination in the water running adjacent to the property. This creek represents not just a local water resource but an ecosystem that could be irreversibly harmed by pollutants. A toxic spill could easily ruin the water quality, affecting both humans and wildlife, with long-term consequences.
- spread of infections is another significant risk, particularly if carcasses, possibly from future operations on the site, are not handled correctly. This is an immediate risk for outbreaks affecting humans and animals alike, impacting local health and agriculture in detrimental ways.
- Air quality could be compromised due to the potential burning of gas to incinerate animals. Such actions could lead to air pollution, causing respiratory issues for residents—especially the young and elderly—and diminishing overall quality of life.

We must consider what we stand to lose if these changes proceed. The current agricultural designation supports our local economy, ensures sustainable practices, and maintains the environmental balance. Changing the zoning jeopardizes all of this for a short-term plan that does not benefit the majority of Innerkip area residents.

Help us protect our community and its core values by opposing this zoning change. Sign the petition to preserve the agricultural integrity and safety of Innerkip, ON, for future generations. Your support is crucial to maintaining our community's character and environment.

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Verified signatures 

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and agree to receive occasional emails about campaigns on Change.org.
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PaulCheryl ...
Petition Starter

[Media inquiries](#)

293⁺

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Supporter Voices

Featured Comments



Emily, Innerkip
4 months ago

"Concerned about pollutants in the air that negatively impact our health. It is way too close to our residences and our school."

4 Likes



Kelly, Baden
2 months ago

"The proposal is too close to residential properties and is a waste of valuable farm land. Water contamination and smell also not good. Should be placed in an industrial area NOT farm land"

1 Like

| Name | City | State | Postal Code | Country | Signed On |
|-------------------------|----------------------|-------|-------------|---------|-----------|
| Paul & Cheryl Kornaker | Innerkip | | N0J | Canada | 8/28/2025 |
| Tasha Kornaker | Innerkip | | N0J | Canada | 8/28/2025 |
| dave robertson | Woodstock | | N4S | Canada | 8/28/2025 |
| Christine Pickering | Lakeside | | N0M | Canada | 8/29/2025 |
| Janis Henderson-Devries | Innerkip, ON | | N0J1M0 | Canada | 8/29/2025 |
| Jen Glasser | Innerkip | | N0J1M0 | Canada | 8/29/2025 |
| Charlene King | Innerkip | | N0J1M0 | Canada | 8/29/2025 |
| Pat Sokic | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Milan Sokic | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Linda Fader | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Faith Laughlin | Innerkip | | N0J | Canada | 8/29/2025 |
| Nate Kornaker | Innerkip | | N0J | Canada | 8/29/2025 |
| Christian Mitchell | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Madeleine Dodaro | Woodstock | | N4T | Canada | 8/29/2025 |
| Susan Nicholas | Woodstock | | N4S | Canada | 8/29/2025 |
| Sue Varga | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Verne Kean | Woodstock | | N4S | Canada | 8/29/2025 |
| Asif Sultan | Brantford | | N0E | Canada | 8/29/2025 |
| Russ King | Innerkip | | N0J1M0 | Canada | 8/29/2025 |
| Ryan Husk | Woodstock | | N4S | Canada | 8/29/2025 |
| Robert Shoemaker | Toronto | | M4P | Canada | 8/29/2025 |
| Dan Buisman | Toronto | | M5A | Canada | 8/29/2025 |
| Jason Lovie | Innerkip | | N0J | Canada | 8/29/2025 |
| Paige Moesker | Toronto | | M5V | Canada | 8/29/2025 |
| Doug Nicholas | Woodstock | | N4S | Canada | 8/29/2025 |
| Justin Leger | Woodstock | | N4S | Canada | 8/29/2025 |
| Derek White | East Zorra-Tavistock | | M9A | Canada | 8/29/2025 |
| Steve Collins | Toronto | | M6N | Canada | 8/29/2025 |
| Wilma Haas | Innerkip | | N0J 1MO | Canada | 8/29/2025 |
| Dawn Collins | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Divjot Singh | Innerkip | | N0J1M0 | Canada | 8/29/2025 |
| Ann McRuvie | Caledon | | L7e 1h9 | Canada | 8/29/2025 |
| STEVE RUNNING | Toronto | | M5V | Canada | 8/29/2025 |
| Kyle Collins | Innerkip | | N0J 1M0 | Canada | 8/29/2025 |
| Kristina Zikovic | Innerkip | | N0J | Canada | 8/29/2025 |
| Kevin Zikovic | Innerkip | | N0J1M0 | Canada | 8/29/2025 |
| Angel Hsien | Kitchener | | N2G | Canada | 8/29/2025 |
| Carol Parks | oshawa | | L1j 1z3 | Canada | 8/29/2025 |
| Emily Shoemaker | Innerkip | | N0J | Canada | 8/29/2025 |
| Justin Peckitt | Innerkip | | N0j1m0 | Canada | 8/29/2025 |
| Robert Tallman | Victoria | | L9T | Canada | 8/29/2025 |
| Susan Nicholas | Innerkip ON | | N0J1M0 | Canada | 8/29/2025 |
| Christopher Bell | Woodstock | | N4S | Canada | 8/29/2025 |

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|----------------------|----------------------|---------|--------|-----------|-----------|
| Priscilla Bell | Woodstock | N4S | Canada | 8/29/2025 | |
| Megan Reinhart | Innerkip | N0J | Canada | 8/29/2025 | |
| Neil Butler | Woodstock | N0j | Canada | 8/29/2025 | |
| Hailey Strecker | Innerkip | N5C | Canada | 8/29/2025 | |
| Peter Mucha | Innerkip | N0j1m0 | Canada | 8/29/2025 | |
| C Beckmann | Toronto | M5A | Canada | 8/29/2025 | |
| Justin MacKay | Toronto | M9N | Canada | 8/29/2025 | |
| Gilchrist Julie | Innerkip | N0J 1M0 | Canada | 8/29/2025 | |
| Ashley Gerencser | Innerkip | N0j1m0 | Canada | 8/29/2025 | |
| KULWINDER JASSAL | Woodstock | N4T | Canada | 8/29/2025 | |
| Jacqui Rawlings | Woodstock | N4T | Canada | 8/29/2025 | |
| Geoff Deignan | Guelph | N1G | Canada | 8/29/2025 | |
| Allie Reinhart | Innerkip | N0j1m0 | Canada | 8/29/2025 | |
| Jayde Malek | Kitchener | L6K | Canada | 8/29/2025 | |
| Rachel Pautler | Innerkip | N0J 1M0 | Canada | 8/29/2025 | |
| Erika Woods | Innerkip | N0J | Canada | 8/29/2025 | |
| Elisabeth Cairns | Toronto | M5A | Canada | 8/29/2025 | |
| Cheryl Edl | Victoria | L9T | Canada | 8/30/2025 | |
| Tammy Clayton | Innerkip | N0J 1M0 | Canada | 8/30/2025 | |
| Felicia Moyer | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| David Williams | Montreal | H3S | Canada | 8/30/2025 | |
| Amin Safadi | Innerkip | N0J | Canada | 8/30/2025 | |
| Dan Ecuimates | Innerkip | N0j | Canada | 8/30/2025 | |
| Michael Littlejohns | Victoria | L9T | Canada | 8/30/2025 | |
| Michelle Black | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| Kendra Spiteri | Guelph | N1E | Canada | 8/30/2025 | |
| Rebekah Dinney | Innerkip | N0M 1M0 | Canada | 8/30/2025 | |
| Tracy Bowen | Victoria | N0J1M0 | Canada | 8/30/2025 | |
| Brianne Bosak | Innerkip | N0J 1M0 | Canada | 8/30/2025 | |
| Martha Valencia | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| Ashley Bauman | Innerkip | ON | N0J | Canada | 8/30/2025 |
| Margaret Anne Huxley | Drumbo | N0J 1G0 | Canada | 8/30/2025 | |
| Michelle DeMelo | Toronto | M5V | Canada | 8/30/2025 | |
| Dominica Wiszniewski | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| Dave Fernandes | Innerkip | N0J 1M0 | Canada | 8/30/2025 | |
| Brandon McClay | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| Michele Luksic | East Zorra-Tavistock | N0J 1M0 | Canada | 8/30/2025 | |
| Doug Mcclay | Innerkip | Noj1m0 | Canada | 8/30/2025 | |
| mark matos | Innerkip | N0J | Canada | 8/30/2025 | |
| April Kingsley | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| S E | Woodstock | N4S | Canada | 8/30/2025 | |
| jim harcourt | innerkip ont | n0j1m0 | Canada | 8/30/2025 | |
| Daxton Wilson | Innerkip | N0J1M0 | Canada | 8/30/2025 | |
| Camila Taborda | Innerkip | N0J 1M0 | Canada | 8/30/2025 | |

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|-------------------------|------------------|----------|--------|-----------|
| Brenda Camp | Innerkip | N0J 1M0 | Canada | 8/30/2025 |
| Rob Shoemaker | Toronto | M5R | Canada | 8/30/2025 |
| Joesy Bernat | Innerkip | N0j1m0 | Canada | 8/30/2025 |
| John Austin | Innerkip | N0J1M0 | Canada | 8/30/2025 |
| Stephanie Austin | Toronto | M5R | Canada | 8/30/2025 |
| Peter Austin | Woodstock | N4S5L5 | Canada | 8/30/2025 |
| Ralph Tamming | Innerkip | N0j 1m0 | Canada | 8/30/2025 |
| Jackie Tamming | Toronto | M4L | Canada | 8/30/2025 |
| Paul Brittain | Ontario | N0J 1M0 | Canada | 8/30/2025 |
| Mary-Margaret Braund | Innerkip, ON | N0J1M0 | Canada | 8/31/2025 |
| Judy Bruce | Wasaga Beach | L9Z 2B1 | Canada | 8/31/2025 |
| Bill Varga | Woodstock | N4S | Canada | 8/31/2025 |
| Teresa Cabral | Kitchener | N2C 1G2 | Canada | 8/31/2025 |
| Emily Engel | Innerkip | N0J 1M0 | Canada | 8/31/2025 |
| Mark Schadenberg | Woodstock | N4T 0E9 | Canada | 8/31/2025 |
| Terry McArdle | Innerkip Ontario | N0J 1M0 | Canada | 8/31/2025 |
| Daniel Clare | Victoria | L9T | Canada | 9/1/2025 |
| Robert Austin | Woodstock | N4S5K4 | Canada | 9/1/2025 |
| Michael Franko | Toronto | N0J | Canada | 9/1/2025 |
| Kimberley Swanson | Innerkip | N0J 1M0 | Canada | 9/1/2025 |
| Anita Lennox | Innerkip | N0J | Canada | 9/1/2025 |
| Ella McRoberts | Toronto | M5A | Canada | 9/1/2025 |
| Mike Steeves | Innerkip | N0J 1 M0 | Canada | 9/2/2025 |
| Jairus and Colleen Peat | Bright | N0J 1B0 | Canada | 9/2/2025 |
| Liliana Paliko | Kitchener | N2N 3L7 | Canada | 9/2/2025 |
| Gail Schaefer-Krampien | Baden | N3A | Canada | 9/2/2025 |
| Joanne Christensen | Innerkip | N0J1M0 | Canada | 9/2/2025 |
| Mary Steeves | Kitchener | N2E | Canada | 9/2/2025 |
| Kristy Ziegel | Innerkip | N4s | Canada | 9/2/2025 |
| ANDREW STEEVES | Waterloo | N2K | Canada | 9/2/2025 |
| Linda Geddes | Etobicoke | M9W | Canada | 9/2/2025 |
| Susan Gerber | Toronto | M5R | Canada | 9/2/2025 |
| Erika Davidson | Cambridge | N1S | Canada | 9/2/2025 |
| T Kreller | Woodstock | N4t 0c3 | Canada | 9/2/2025 |
| Anita Dolan | Woodstock | N4S | Canada | 9/2/2025 |
| Sarah Davidson | Mississauga | L5M | Canada | 9/2/2025 |
| Richard Lennox | Innerkip | N0J1M0 | Canada | 9/2/2025 |
| John Kreller | Ingersoll | N5C | Canada | 9/2/2025 |
| Mike Laughlin | Innerkip | N0J1M0 | Canada | 9/2/2025 |
| Aaron Grant | Cambridge | N1T | Canada | 9/3/2025 |
| Valarie Mounsteven | Ingersoll | N5C | Canada | 9/3/2025 |
| Suzan Payne | Kitchener | N2H | Canada | 9/3/2025 |
| Kathrine Macginnis | To | M4R | Canada | 9/3/2025 |
| Martin Eby | st Agatha | N0B2L0 | Canada | 9/3/2025 |

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|----------------------|--------------|---------|--------|-----------|
| Melody JOHNSON | Toronto | M6N | Canada | 9/3/2025 |
| Cheryl Dolan | Woodstock | N4S | Canada | 9/4/2025 |
| Jackie McDonald | Paris | N3L | Canada | 9/4/2025 |
| Alicia Kaufman | Woodstock | N4S | Canada | 9/4/2025 |
| Rose Lavoie | Cambridge | N1T | Canada | 9/4/2025 |
| Janet Mosher | Cambridge | N1T | Canada | 9/4/2025 |
| John Glover | Toronto | M4G | Canada | 9/4/2025 |
| Sarah Jones | Toronto | M6S | Canada | 9/4/2025 |
| Brittany Glover | Camrose | T4V | Canada | 9/4/2025 |
| Jordan Bender | Kitchener | N2R | Canada | 9/4/2025 |
| Dennis Glover | Camrose | T4V | Canada | 9/4/2025 |
| Leah Flanagan | New Hamburg | N3A | Canada | 9/4/2025 |
| Don Mosher | Cambridge | N1T | Canada | 9/4/2025 |
| Matt Eaton | London | N6A | Canada | 9/4/2025 |
| Ed Berry | Guelph | N1E | Canada | 9/4/2025 |
| Matt Horyn | Cambridge | N1T | Canada | 9/4/2025 |
| Michael Naisbitt | Brantford | N3R | Canada | 9/4/2025 |
| Rick Harwood | Innerkip | N0J1M0 | Canada | 9/5/2025 |
| Samantha MacPherson | Woodstock ON | N4S | Canada | 9/5/2025 |
| Jim Glasser | Baden | N3A | Canada | 9/5/2025 |
| Debra Rowland | Burlington | L7R | Canada | 9/5/2025 |
| Erin Schreurs | Innerkip | N0j1m0 | Canada | 9/5/2025 |
| Sara McCreery | Innerkip | N0J 1M0 | Canada | 9/5/2025 |
| Sorin Badea | Kitchener | N2m1a1 | Canada | 9/5/2025 |
| Joe Mckinnon | Woodstock ON | N2J4G8 | Canada | 9/5/2025 |
| Navneet Kaur Singh | Toronto | M4P | Canada | 9/6/2025 |
| Sandeep Dhillon | Innerkip | N0J1M0 | Canada | 9/6/2025 |
| Graham Moore | Kitchener | N2H | Canada | 9/7/2025 |
| Kelly Chris | Tillsonburg | N4G | Canada | 9/8/2025 |
| Lori Lacey | Brantford | N3T | Canada | 9/8/2025 |
| Kaylee Lacey | Brantford | N3R 1R4 | Canada | 9/8/2025 |
| Patti & Brad Lichtry | Innerkip | Noj1m0 | Canada | 9/8/2025 |
| Michael Lichtry | innerkip | N0J1M0 | Canada | 9/8/2025 |
| Tina Condon | Cambridge | N1T | Canada | 9/8/2025 |
| Sarah Lacey | Mississauga | L5N | Canada | 9/8/2025 |
| Kerry Bun | Guelph | N1G | Canada | 9/8/2025 |
| Dayna Mastro | Cambridge | N3C1T9 | Canada | 9/8/2025 |
| Marianne Kaulbach | Victoria | L9T | Canada | 9/8/2025 |
| Lynda Eby | Toronto | M5M | Canada | 9/9/2025 |
| Jeff Lichtry | innerkip | N0J1m0 | Canada | 9/9/2025 |
| Todd Lichtry | innerkip | N0J1M0 | Canada | 9/9/2025 |
| darleen mitchell | Toronto | M4N | Canada | 9/10/2025 |
| Deb McKay | Woodstock | N4S | Canada | 9/10/2025 |
| Neil Parry | Brantford | N3T | Canada | 9/10/2025 |

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|---------------------|----------------------|---------|--------|-----------|
| Jennifer Kaye | Toronto | M5A | Canada | 9/11/2025 |
| Debbie Yeoman | Owen Sound | N4K5N7 | Canada | 9/12/2025 |
| Patrick Barnard | Woodstock | N4S | Canada | 9/12/2025 |
| Steph B | Toronto | M3C | Canada | 9/12/2025 |
| Ryan Miller | Woodstock | N4S | Canada | 9/12/2025 |
| JESSICA ROWE | Woodstock ON | N4S | Canada | 9/12/2025 |
| Liam Irwin | Woodstock | N4T | Canada | 9/12/2025 |
| Scott McGinnis | East Zorra-Tavistock | n4s | Canada | 9/12/2025 |
| Jonathan Hann | Woodstock | N4T | Canada | 9/12/2025 |
| Tibor Schmid | Woodstock | N4S | Canada | 9/13/2025 |
| Jenna Witmer | Richmond Hill | L4S | Canada | 9/13/2025 |
| Mary Burke | Woodstock | N4S 7V3 | Canada | 9/13/2025 |
| John Ukos | Woodstock | N4T | Canada | 9/13/2025 |
| Jenny Kondrashikhin | Woodstock | N4S | Canada | 9/13/2025 |
| steve deeks | Ingersoll | n2c1j9 | Canada | 9/14/2025 |
| Debbie Morgan | Toronto | M9N | Canada | 9/18/2025 |
| Tori Morgan | Innerkip | N0J1M0 | Canada | 9/18/2025 |
| John Williams | Innerkip | N0J 1M0 | Canada | 9/25/2025 |
| Karen Darnell | Innerkip | N0j1m0 | Canada | ##### |
| Sheri Karelse | Calgary | T2A | Canada | ##### |
| Riley Porter | Innerkip | N0J1M0 | Canada | ##### |
| Kristine Ferrier | Innerkip | N0j1m0 | Canada | ##### |
| Karen Thomas Forte | Woodstock | N0J | Canada | ##### |
| Kathryn Jacklin | Woodstock | N4S | Canada | ##### |
| Jamie Butcher | Innerkip | N4S | Canada | ##### |
| Audrey Klingenberg | Innerkip | N0J 1m0 | Canada | ##### |
| Emily Moss | Innerkip | N0J1M0 | Canada | ##### |
| Reece Klingenberg | Woodstock | N4S | Canada | ##### |
| Kyle Williams | Innerkip | N0J 1M0 | Canada | ##### |
| Navdeep Randhawa | Toronto | M6M | Canada | ##### |
| Shawn Reeves | Innerkip | N0J 1M0 | Canada | ##### |
| Julie Lyzenga | Innerkip | N0J1M0 | Canada | ##### |
| Sally Bradley | Innerkip | N0J1M0 | Canada | ##### |
| Christine Lane | Innerkip, ON | N0J1M0 | Canada | ##### |
| Madison Van Wyk | Woodstock | N4S7V9 | Canada | ##### |
| Robert Shoemaker | Woodstock | N4V | Canada | ##### |
| Tina Nemeth | Innerkip | N0j1m0 | Canada | ##### |
| Greg Harwood | Innerkip | N0J1M0 | Canada | ##### |
| Kelly Buck | Innerkip | N0J 1M0 | Canada | ##### |
| Graham Cooke | Innerkip | N0J1M0 | Canada | ##### |
| Karen Lee | Woodstock | N4S | Canada | ##### |
| David Lee | Woodstock | N4S | Canada | ##### |
| Karen Mitchell | Woodstock | N4S | Canada | ##### |
| Christine Horn | Norwich | N0J | Canada | ##### |

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|-----------------------------|------------------|---------|--------|-----------|
| David Placko | Innerkip | N0j1m0 | Canada | ##### |
| M Chowan | Innerkip | N0J 1M0 | Canada | ##### |
| Dawson Bonn | Woodstock | N4S | Canada | ##### |
| Lauren Bragger | London | N6G | Canada | ##### |
| Ina Tizzard | Innerkip | N0J 1M0 | Canada | ##### |
| Janet Nymeyer | Woodstock | N4T | Canada | ##### |
| Rob Bowler | Innerkip | N1L | Canada | ##### |
| Leah Beedie | Innerkip | N0J | Canada | ##### |
| Dave Miles | Woodstock | N4S | Canada | ##### |
| Jenny Crossman | Innerkip | N0J1M0 | Canada | ##### |
| Sue Mullin | woodstock,ont | N4S7V9 | Canada | ##### |
| Greg Wehrle | Victoria | L9T | Canada | ##### |
| Marina Brkljaca | N0J1M0 | N0J | Canada | ##### |
| Avninder Otal | Brampton | L6R | Canada | ##### |
| Harpal Singh | Toronto | M6H | Canada | ##### |
| Lorraine Doolaar | Innerkip | N0j1m0 | Canada | ##### |
| Shannon Havens | Woodstock | N4S | Canada | ##### |
| Lisa Dennis | Innerkip, Ont | N0J 1M0 | Canada | ##### |
| Eleni Anagnosti | Toronto | M3M | Canada | ##### |
| Jenni Brown | Innerkip | N0j1m0 | Canada | ##### |
| Darren Rogers | Woodstock | N4S | Canada | ##### |
| Al Muzzin | Innerkip | N0J 1M0 | Canada | ##### |
| Ailsa Coughtry | Innerkip Wrexham | N0J1M0 | Canada | ##### |
| Jason Lee | Innerkip | N0J 1m0 | Canada | ##### |
| carolyn muzzin | Woodstock | N4S | Canada | ##### |
| Cheryl Shoemaker | Toronto | M9N | Canada | ##### |
| Marg Mayer | Kitchener | N2A 3K6 | Canada | ##### |
| Jason Birmingham | Woodstock | N0J 1M0 | Canada | ##### |
| Kelly Brown | Woodstock | N4S | Canada | ##### |
| alida riddell | Woodstock | N4S | Canada | ##### |
| Carey Uncer | Innerkip | N0J 1M0 | Canada | ##### |
| Kaitlin Uncer | Woodstock | N4T | Canada | ##### |
| Leanne Dietrich | New Hamburg | N3A 1E8 | Canada | ##### |
| Mya Erb | New Hamburg | N3A 2H8 | Canada | ##### |
| Irene Olson | Ingersoll | N5C | Canada | 11/1/2025 |
| Lauren Vording | Innerkip | N0J 1M0 | Canada | 11/4/2025 |
| angelina maurer | Innerkip | N0J 1M0 | Canada | 11/6/2025 |
| Tara Placko | Innerkip | N0j | Canada | ##### |
| Andrea Roebuck | Elora | N0B1S0 | Canada | ##### |
| Elizabeth Harris | Kingston | K7m3z9 | Canada | ##### |
| Brenda Brown/ Rebecca Brown | Toronto | M5N | Canada | ##### |
| Hyo Collom | Kingston | K7L 4T8 | Canada | ##### |
| Cailey Bradshaw | Cambridge | N3H | Canada | ##### |
| Eleanor Barnim | Woodstock | N4S | Canada | ##### |

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|--------------------|--------------------------------|---------|--------|-------|
| Theresa Ball | Woodstock | N4S | Canada | ##### |
| Tammy Hewson | Woodstock | N4S | Canada | ##### |
| Stephanie Lacroix | Hamilton | L9B | Canada | ##### |
| Karen Danis | Stratford | N5A | Canada | ##### |
| Marvin VanSickle | Vittoria | N0E 1W0 | Canada | ##### |
| Sandy Overholts | Cobourg | K9A | Canada | ##### |
| Patricia Colley | Woodstock | N4S | Canada | ##### |
| Elaine Kitchen | Nanticoke | N0A | Canada | ##### |
| Aleeza Sohn | Kingston | K7K | Canada | ##### |
| Taylor Gauthier | Dundas | L9H | Canada | ##### |
| Matt Michniewicz | Tillsonburg | N4G | Canada | ##### |
| Andrew Mazurek | Mississauga | L5B | Canada | ##### |
| Marcelo Amorim | Waterloo | N2L5W6 | Canada | ##### |
| Remo Pennacchioli | Innerkip | N0J 1M0 | Canada | ##### |
| Prabhjot Dhanoa | Woodbridge | L4L | Canada | ##### |
| Dereck Birtch | Innerkip | N0J | Canada | ##### |
| Nicholas Robertson | Innerkip | N0J 1M0 | Canada | ##### |
| Jon Rowe | RR5 Woodstock | N4S 7V9 | Canada | ##### |
| Dave Robertson | Blandford blenheim tov N0j 1m0 | | Canada | ##### |
| Shane Kearley | Woodstock | N4S | Canada | ##### |
| Natalie Minshall | Stratford | N5a3e2 | Canada | ##### |
| Natasha Nelson | Vaughan | L6A | Canada | ##### |
| Nancy Eaton | Brantford | N3R | Canada | ##### |
| Barb Livingstone | Ingersoll | N5C | Canada | ##### |
| Kim Dorken | Innerkip | N0J1M0 | Canada | ##### |
| Steve Vording | Innerkip | N0j 1m0 | Canada | ##### |
| Carlene Smith | Woodstock | N4S | Canada | ##### |
| kai verma | Woodstock | N4S | Canada | ##### |
| michael kornaker | Jacksonville | | | ##### |
| Chelsey Mackenzie | Hamilton | L8P | Canada | ##### |

| Name | City | State | Postal Code | Country | Comment | Comment |
|--------------|-----------|-----------|-------------|---------|-----------|---|
| Jackie Radl | Innerkip | | N0J 1M0 | Canada | 8/30/2025 | "We do not want the contamination in our well water and this is a money grab from the people wanting to do this, perfectly good service offered by Gateway and the one in London" |
| Emily Engel | Innerkip | | N0J 1M0 | Canada | 8/31/2025 | "Concerned about pollutants in the air that negatively impact our health. It is way too close to our residences and our school." |
| Debbie Mitti | Innerkip | | N0J1m0 | Canada | 9/10/2025 | "Air quality, farm land lost, pollution. To streams, traffic problems" |
| John Ukos | Woodstock | | N4T 1S7 | Canada | 9/13/2025 | "Location could be considerably further from residential areas than the planned location." |
| steve deek: | Ingersoll | | n2c1j9 | Canada | 9/14/2025 | "This isn't healthy and bad for the environment" |
| Kelly Chris | Baden | | N3A | Canada | ##### | "The proposal is too close to residential properties and is a waste of valuable farm land. Water contamination and smell also not good. Should be placed in an industrial area NOT farm land" |
| Erika Valec | Ottawa | | K2E | Canada | ##### | "This proposed development is extremely close to residential communities. Nobody wants this crematorium in such close proximity to their home." |
| Jon Rowe | RR5 | Woodstock | N4S 7V9 | Canada | ##### | "Location isn't good for traffic and takes up farmland. Put it out at highway 2 by Toyota." |