Report No: CP 2025-283
COMMUNITY PLANNING
Council Date: October 1, 2025

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 ZN1-25-05 – Matthew and Jacklynn Bowcott

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 m^2 (10,000 ft^2) in size, as an On-Farm Diversified Use (OFDU).
- Planning staff recommend that the application not be approved as the proposal is beyond the scale considered reasonable for an OFDU 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:

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
Schedule “C-2”	County of Oxford Development Constraints Plan	Unstable Soil

TOWNSHIP OF BLANDFORD-BLENHEIM ZONING BYLAW 1360-2002:

Existing Zoning: 'General Agricultural Zone (A2)'

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

PROPOSAL:

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 m^2 (10,000 ft^2) crematorium building, a parking lot accommodating 24 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 would be 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 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 owners maintains the appropriate licence to do so.

Initial operating hours of the business would be a standard 8:00 am – 5:00 pm schedule, however, the applicants have indicated that the business may operate 24 hours a day in the future. 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 property and the existing zoning in the immediate vicinity.

Plate 2, Aerial Photography (2020), provide 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 property, 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 property) 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 farm property 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 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 Agricultural 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 m^2 (6,000 ft^2), 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.

Zoning By-law

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 m^2 (430.6 ft^2) is applied. At a size of 929 m^2 (10,000 ft^2) 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 m^2 (161.4 ft^2) 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 property owners on July 4th, 2025, and notice of public meeting was issued on September 11th, 2025. As of the date of this report, 11 letters of concern have been received from members of the general public. A petition against the proposal has been submitted to Staff containing more than 190 signatures. Two letters of support from a member 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 2025-283 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 existing 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 Agricultural 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 an agricultural property but located 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 very 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 m^2 (10,000 ft^2), which exceeds the permitted maximum gross floor area of 557 m^2 (6,000 ft^2) by 372 m^2 (4,000 ft^2), 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 agricultural 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, which should generally be directed to be located in a settlement area (e.g. on lands designated for commercial/industrial purposes with appropriate services).

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. OP25-08-1) 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. ZN1-25-05) 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

Plate 1: Location Map and Existing Zoning
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

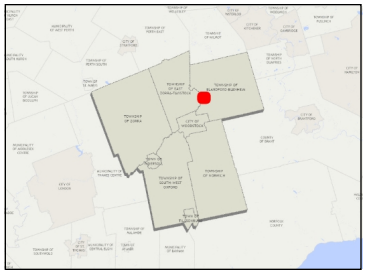
Legend

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



0 205 409 Meters

NAD_1983_UTM_Zone_17N

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

June 20, 2025

Plate 2: Aerial Photography (2020)
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

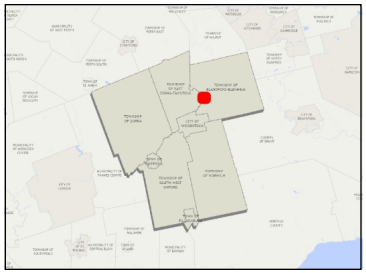
Legend

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



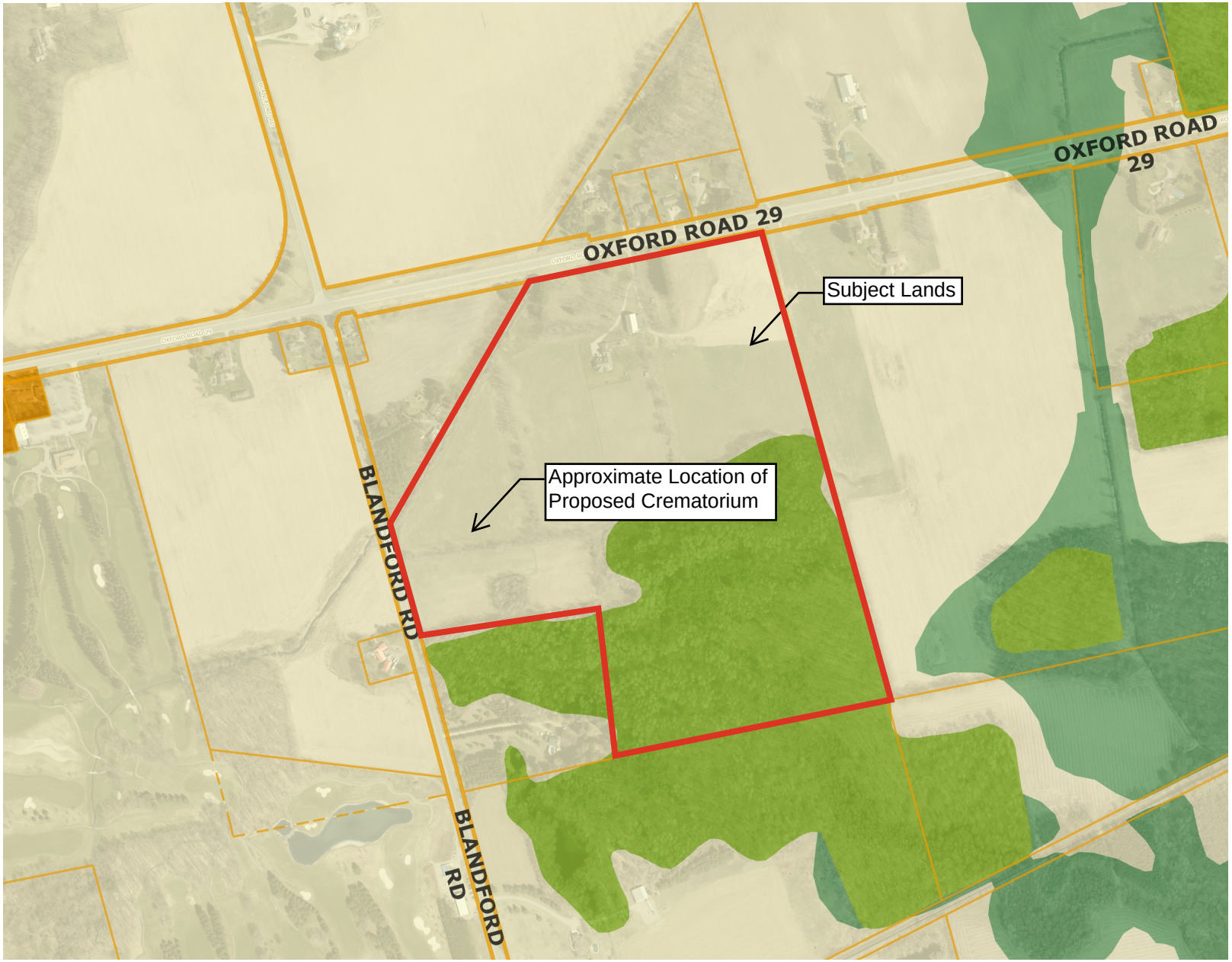
0 205 409 Meters

NAD_1983_UTM_Zone_17N

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

Plate 3: Official Plan Designation Map
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



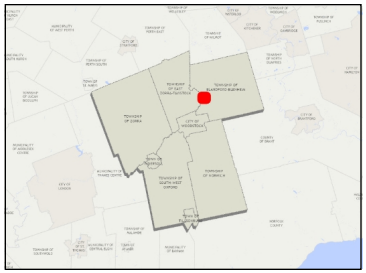
Legend

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



0 205 409 Meters

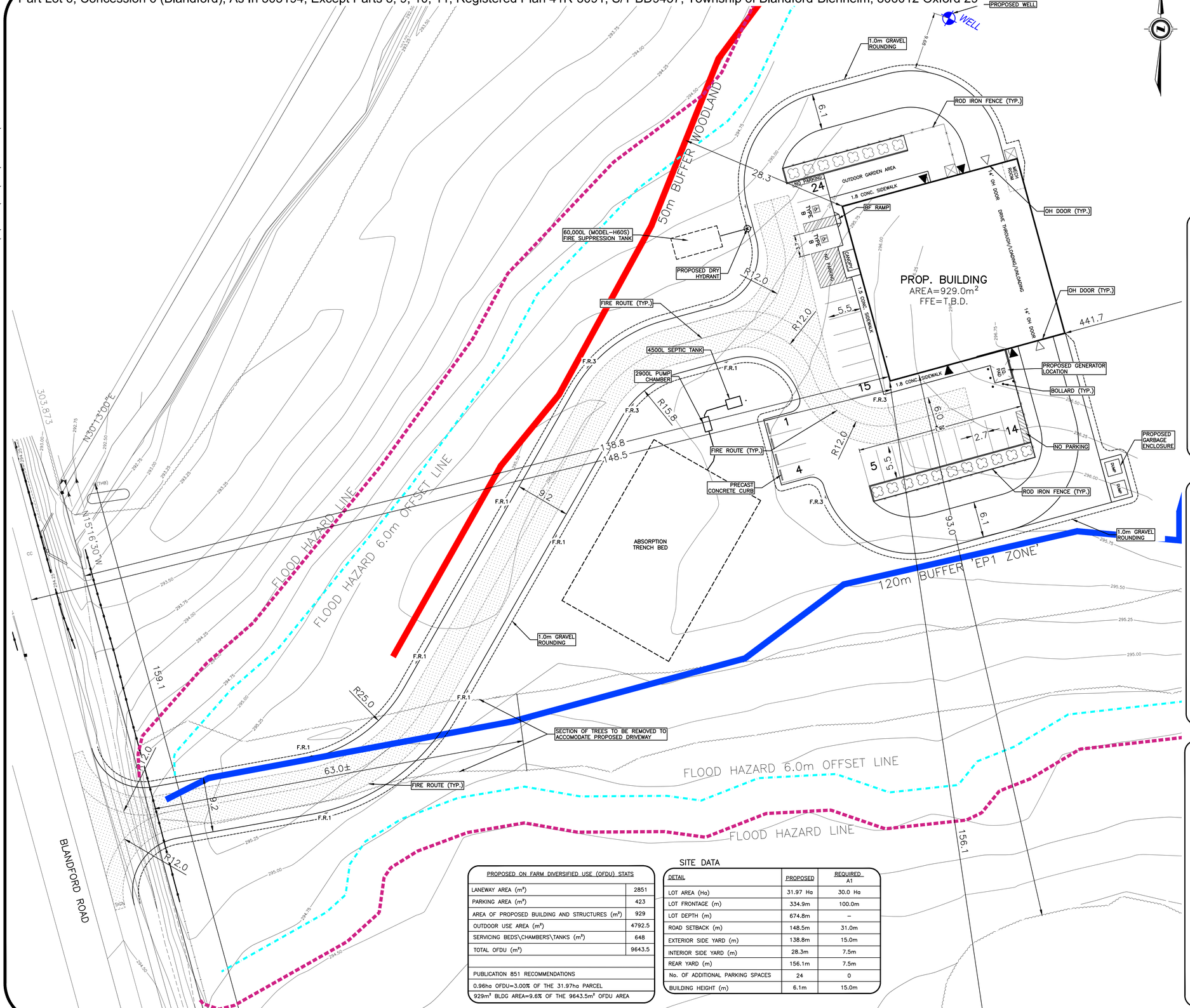
NAD_1983_UTM_Zone_17N

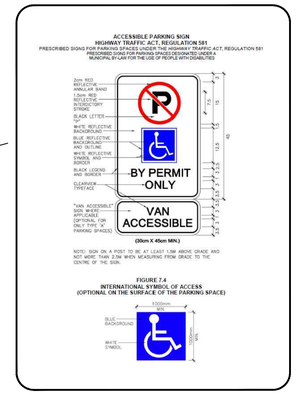
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

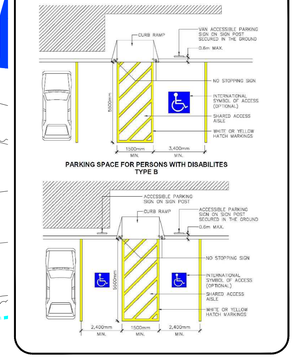
September 16, 2025

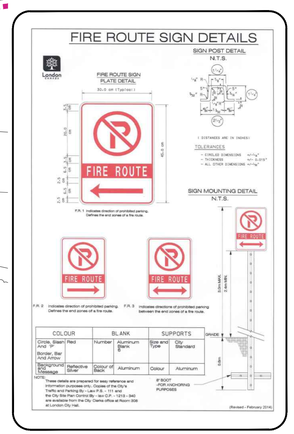
Plate 4: Applicants' Sketch
File No. OP25-08-1 and ZN1-25-05 (Bowcott)
Part Lot 6, Concession 6 (Blandford), As In 503194, Except Parts 8, 9, 10, 11, Registered Plan 41R-3091, S/T BD9457, Township of Blandford-Blenheim, 806012 Oxford 29

MTE FILE PATH: P:\P\55715\200\DWG\SITE PLAN\55715-200-SITE PLAN









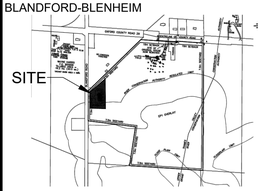
PROPOSED ON FARM DIVERSIFIED USE (OFDU) STATS

LANEWAY AREA (m²)	2851
PARKING AREA (m²)	423
AREA OF PROPOSED BUILDING AND STRUCTURES (m²)	929
OUTDOOR USE AREA (m²)	4792.5
SERVICING BEDS\CHAMBERS\TANKS (m²)	648
TOTAL OFDU (m²)	9643.5
PUBLICATION 851 RECOMMENDATIONS	
0.96ha OFDU=3.00% OF THE 31.97ha PARCEL	
929m² BLDG AREA=9.6% OF THE 9643.5m² OFDU AREA	

SITE DATA

DETAIL	PROPOSED	REQUIRED A1
LOT AREA (Ha)	31.97 Ha	30.0 Ha
LOT FRONTAGE (m)	334.9m	100.0m
LOT DEPTH (m)	674.8m	–
ROAD SETBACK (m)	148.5m	31.0m
EXTERIOR SIDE YARD (m)	138.8m	15.0m
INTERIOR SIDE YARD (m)	28.3m	7.5m
REAR YARD (m)	156.1m	7.5m
No. OF ADDITIONAL PARKING SPACES	24	0
BUILDING HEIGHT (m)	6.1m	15.0m

THE MUNICIPALITY OF BLANDFORD-BLENHEIM



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

FLOODING HAZARD LINE
FLOOD HAZARD 6.0m OFFSET LINE
50.0m BUFFER WOODLAND LINE
120m BUFFER 'EP1 ZONE'

No.	REVISION	BY	YYYY-MM-DD
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

MTE
Engineers, Scientists, Surveyors
519-204-6510

OWNER
TRIGON CONSTRUCTION MANAGEMENT
35 RIDGEWAY CIRCLE WOODSTOCK, ON

PROJECT
BLANDFORD RD ANIMAL CREMATORY
BLANDFORD ROAD DRUMBO, ON

DRAWING
SITE PLAN

Project Manager L. SULLIVAN	Project No. 55715-200
Design By JAC	Checked By AOOS
Drawn By JAC	Checked By JJM
Surveyed By	Drawing No. A1.1
Date Nov.18/24	
Scale 1:300	Sheet 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

Zelinka Priamo Ltd.
LAND USE PLANNERS

September 23, 2025 *sent via e-mail*

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

Re: Project Information
Official Plan Amendment & Zoning By-law Amendment Applications
Matthew and Jacklynn Bowcott
806012 Oxford Road 29
Village of Innerkip, Township of Blandford-Blenheim, ON
Our File: TRG/EZT/25-01

Ahead of the public meeting scheduled for October 1, 2025, Zelinka Priamo Ltd., on behalf of Matthew and Jacklynn Bowcott, is pleased to submit this information letter regarding concurrent Official Plan Amendment ('OPA') and Zoning By-law Amendment ('ZBA') Applications for the lands located at 806012 Oxford Road 29 (the "subject lands"). The applications seek to permit an "*Animal Crematorium*" use on the subject lands as an On-Farm Diversified Use.

This letter provides a brief summary of the proposed development and planning analysis provided in the Planning Justification Report ("PJR") submitted in support of the OPA/ZBA applications.

PROPOSED DEVELOPMENT

Matthew and Jacklynn Bowcott are the sole owners and residents of the subject lands, and are proposing to construct a low-rise 929 m^2 "*Animal Crematorium*" on the southwesterly portion of their farm, with access off Blandford Road.

The "*Animal Crematorium*" is proposed to directly support equine and associated facilities in the surrounding agricultural area, with most of the clientele focusing on companion animals, primarily horses and small animals. All visits will be by appointment only. The anticipated number of employees will range from 6 to 9 full and part-time staff.

ON-FARM DIVERSIFIED USE ("OFDU")

An On-Farm Diversified Use is a permitted use in prime agricultural areas. It is our professional opinion that the proposed "*Animal Crematorium*" meets the five criteria to qualify as an OFDU as per OMAFRA's Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas 2016 (Publication 851) and the 2024 Provincial Planning Statement for the following reasons:

318 Wellington Road, London, ON, N6C 4P4
TEL (519) 474-7137 Email: zp@zpplan.com

- The proposed "*Animal Crematorium*" aims to facilitate the final disposal of animal remains from nearby farms; offers a safer environmental alternative to disposal methods that pose risks to groundwater, such as on-site burial; and prevents individual farms from disrupting farmland for on-farm animal burials;

- The proposed use is located on an active farm property. Minimal net impact is anticipated on existing agricultural uses on the subject lands;

- The proposed building size is approximately 929m², which represents 9.6% of the total area used for the "*Animal Crematorium*", thereby complying with the maximum recommended limit of 20%;

- The project area measures approximately 0.96ha in size, totaling approximately 3.0% of the total lot area. The OMAFRA Guideline recommends that an OFDU occupies 2% of the size of a property, up to a maximum area of 1 ha. While it is acknowledged that the proposed area of the OFDU is above the 2% guideline, it is less than the 1 ha threshold. Moreover, the proposed building size of 929m² is well below the recommended building size cap (i.e. 20% of 2% land area), demonstrating that the proposed use is appropriately scaled relative to the size of the subject lands; and

- The proposed "*Animal Crematorium*" provides generous setbacks from Blandford Road (i.e. 135m or 440 ft) and will be screened from neighbouring properties by existing vegetation along the lot lines. The proposal development avoids significant natural features and hazard lands and has in-principal support from The Upper Thames River Conservation Authority. Additionally, the proposed building maintains the agricultural and rural character of the area. No significant negative impact is anticipated on existing agricultural operations in the surrounding area;

- The proposed "*Animal Crematorium*" is subject to strict provincial and federal environmental controls and will obtain an Environmental Compliance Approval (ECA) to permit the proposed use on the subject lands. More information on the requirements to operate the facility and incinerators will be provided at the Public Meeting by a consultant;

- The associate traffic with the proposed use will be minimal. 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. All visitors will be received by appointment only.

CONCLUSION

It is our professional opinion that the proposed "*Animal Crematorium*" meets the relevant criteria to qualify as an OFDU, which would be permitted use on the subject lands.

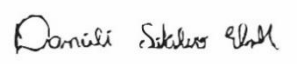
The proposed OPA and ZBA applications are consistent with the intent and policies as set forth in the provincial and municipal planning legislation. Moreover, the proposed use provides direct service and support to agricultural operations in the surrounding area while offering a sustainable alternative 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 amendments are considered appropriate and represent good land use planning.

318 Wellington Road, London, ON, N6C 4P4
TEL (519) 474-7137 Email: zp@zpplan.com

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.

Sincerely,

ZELINKA PRIAMO LTD.



Danieli Sikelero Elsenbruch
Planner

cc. The client (via email)

318 Wellington Road, London, ON, N6C 4P4
TEL (519) 474-7137 Email: zp@zpplan.com

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

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 Innerkip, 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

Rural Oxford Economic Development

PEOPLE • PROXIMITY • PROSPERITY

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

Ronda Stewart, Ec. D.
Economic Development Director

Address
16 Brock St, Thamesford,
ON, N0M 2M0

Phone

Email

Website
www.ruraloxford.ca

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 out 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.
Innerkip, 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

Dustin Robson
Development Planner
County of Oxford

Sept. 16 2025

Concerning File Nos. OP 25-08-1 AND ZN1-25-05
Owners: Mathew and Jacklynn Bowcott.
Applicant: Zelinka Priamo Ltd.
Our names are Clifford and Carol Littlejohns.
We reside at 8016023 County Rd. 29 RR#2 Innerkip N0J1M0.
We, along with many neighbours, have concerns regarding a zone change to allow a factory cremating pets on workable farm land.
Many have been living in this farming community most of their lives, some retired and some with young families. They have enjoyed the daily farming ways to keep the atmosphere meant for the agricultural aspects farms were meant to be.
We can't see how a crematorium could be considered agricultural diversification when it mostly will be used for the disposal of pets.
In a field where corn is now being grown you would erect a 10,000 sqft factory with a 49 ft. exhaust stack. A view neighbours would not appreciate looking at daily or forever how long they reside. Let alone not knowing the many harmful emissions they will be exposed to, environmental problems water issues, many homes (all) have wells and would appreciate a decent water sources.

The landscape will be observed as a factory with a 49 ft exhaust stack. (will there be smoke, smell, noise. Will the parking spaces going to be paved or (eventually) also the driveways.)
Offering hedges and gardens will do little to appease the view for the neighbours closest to the planned site.
The area also is home to many of Nature's inhabitants which most people enjoy viewing (such as wild turkeys, deer, birds and coyotes)
All these animals will be greatly impacted and disturbed. Pollution, noises of cars and trucks, the output of the exhaust stack what fuel being used to heat the fire all are things never experienced in their habitate.
The beauty of nature will be forfeited for a 10,000 sqft factory building. not a pleasant sight.
Farmland growing a bountiful crop is far more appealing to ones senses than the possible reek of death and all that goes hand and hand with the animal crematorium.

Yours truly,
Cliff + Carol Littlejohns

Question? Why is there two file numbers.
What is the intended purpose of the other land?

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 form 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

N0J 1M0

Environments **2014**, *1*, 14-30; doi:10.3390/environments1010014

OPEN ACCESS

environments

ISSN 2076-3298

www.mdpi.com/journal/environments

Review

Review of Evidence of Environmental Impacts of Animal Research and Testing

Katherine Groff *, Eric Bachli, Molly Lansdowne and Theodora Capaldo

New England Anti-Vivisection Society, 333 Washington St. Suite 850, Boston, MA 02108, USA; E-Mails: etbachli@gmail.com (E.B.); mlansdowne@neavs.org (M.L.); theodoracapaldo@neavs.org (T.C.)

* Author to whom correspondence should be addressed; E-Mail: katherinegroff@gmail.com; Tel.: +1-617-523-6020; Fax: +1-617-523-7925.

Received: 13 March 2014; in revised form: 26 May 2014 / Accepted: 28 May 2014 / Published: 6 June 2014

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 in to 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.

Acknowledgments

The authors would like to express their gratitude to Jarrod Bailey for his initial research regarding the environmental effects of air pollution, water pollution, and soil contamination. We also thank Mark Axelrod and Rick Borchelt for their reviews of and helpful comments on this manuscript.

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.

References

1. Koneswaran, G.; Nierenberg, D. Global farm animal production and global warming: Impacting and mitigating climate change. *Environ. Health Perspect.* **2008**, *116*, 578–582.
2. Food and Agriculture Organization of the United Nations, "FAOSTAT" 2012. Available online: http://faostat.fao.org/ (accessed on 22 May 2014).
3. Taylor, K.; Gordon, N.; Langley, G.; Higgins, W. Estimates for worldwide laboratory animal use in 2005. *Altern. Lab. Anim.* **2008**, *36*, 327–342.
4. Knight, A. *The Costs and Benefits of Animal Experiments*; Palgrave Macmillan: Basingstoke, UK, 2011.
5. USDA. Animal Care Information System Search Tool. Available online: http://acissearch.aphis.usda.gov/LPASearch/faces/CustomerSearch.jspx. (accessed on 25 July 2013).
6. Cohen, H. The animal welfare act. *J. Anim. Law* **2006**, *2*, 13–26.
7. Animal Welfare Institute. Rats, Mice & Birds. Available online: https://awionline.org/content/rats-mice-birds (accessed on 10 May 2013).
8. California Biomedical Research Association. Why Are Animals Necessary in Biomedical Research? Available online: http://ca-biomed.org/csbr/pdf/fs-whynecessary.pdf (accessed on 10 May 2013).
9. Americans for Medical Progress. Animal Research FAQs: The Top 10 Questions. Available online: http://www.amprogress.org/AnimalResearchFAQ (accessed on 10 May 2013).

10. Carbone, L. *What Animals Want : Expertise and Advocacy in Laboratory Animal Welfare Policy*; Oxford University Press: San Francisco, CA, USA, 2004.
11. Stallwood, A.; Aid, A.; *Science Corrupted: Revealed: The Nightmare World of GM Mice*; Tyler, A., Ed.; Animal Aid: Kent, UK, 2013.
12. Robinson, V.; Jennings, M.; Working Group. Refinement and reduction in the production of genetically modified mice: Sixth report of the BVAAWF/FRAME/RSPCA/UFAW Joint Working Group on Refinement. *Altern. Lab. Anim. (ATLA)* **2004**, *32*, 373–375.
13. *Animal Welfare Act. 7 U.S.C. § 2131–2159*; United States Congress: Washington, DC, USA, 1966.
14. Office of Laboratory Animal Welfare. *Institutional Animal Care and Use Committee Guidebook*; National Institutes of Health: Bethesda, MD, USA, 2002.
15. Bus, J. Current State and Directions of Animal Toxicity Testing. Presented at the American Chemical Society/Society of Toxicology/Society for Risk Analysis Congressional Briefing. Available online: http://www.acs.org/content/dam/acsorg/policy/acsonthehill/briefings/toxicitytesting/bus-presentation.pdf (accessed on 10 December 2009).
16. Sullivan, K.; Beck, N.; Sandusky, C.; Willett, C. A discussion of the impact of us chemical regulation legislation on the field of toxicity testing. *Toxicol. In Vitro* **2011**, *25*, 1231–1236.
17. National Research Council Committee on Toxicity and Assessment of Environmental Agents. *Toxicity Testing in the Twenty-first Century: A Vision and a Strategy*; National Academies Press: Atlanta, GA, USA, 2007.
18. EPA National Center for Computational Toxicology. Computational Toxicology Research Program. Available online: http://www.epa.gov/ncct/toxcast/ (accessed on 23 Sepember 2013).
19. National Research Council. Toxicity Testing for Assessment of Environmental Agents: Interim Report, 2006. Available online: http://www.nap.edu/openbook.php?record_id=11523&displayrelated=1 (accessed on 25 July 2013).
20. Developmental Therapeutics Program. NCI-60 DTP Human Tumor Cell Line Screen. Available online: http://dtp.nci.nih.gov/branches/btb/ivclsp.html (accessed on 26 July 2013).
21. Cubitt, S.; Sharp, G. Maintaining quality and reducing energy in research animal facilities. *Animal Technology and Welfare*, August 2011, pp. 91–97.
22. Reynolds, S.D. Green and lean: Methods of improving lab animal room ventilation. *ALN*, 31 December 2008.
23. National Research Council Committee for the Update of the Guide for the Care and Use of Laboratory Animals. *Guide for the Care and Use of Laboratory Animals*, 8th ed.; National Academies Press: Washington, DC, USA, 2011.
24. National Research Council. Prudent Practices in the Laboratory: Handling and Management of Chemical Hazards. 2011. Available online: http://www.nap.edu/openbook.php?record_id=12654 (accessed on 25 July 2013).
25. EPA. Envirofacts Multisystem Search. Available online: http://www.epa.gov/enviro/facts/multisystem.html (accessed on 25 July 2013).
26. Suckow, M.A.; Douglas, F.A.; Weichbrod, R.H. *Management of Laboratory Animal Care and Use Programs*; CRC Press: Boca Raton, FL, USA, 2002.

27. Union of Concerned Scientists. Comments of the Union of Concerned Scientists before the Maine Legislature's Utilities and Commerce Committee on LD 1312: The Maine Renewable Resource Portfolio Requirement. 9 April 2003. Available online http://www.ucsusa.org/assets/documents/clean_energy/me-comments-4-9-03.pdf (accessed on 25 July 2013).
28. Allsopp, M.; Costner, P.; Johnston, P. Incineration and human health. *Environ. Sci. Pollut. Res.* **2001**, *8*, 141–145.
29. Franchini, M.; Rial, M.; Buiatti, E.; Bianchi, F. Health effects of exposure to waste incinerator emissions:a review of epidemiological studies. *Ann. DellIstituto Super. Sanità.* **2004**, *40*, 101–115.
30. EPA. Boilers, Process Heaters, Commercial/Industrial Solid Waste Incinerators. Available online: http://www.epa.gov/airquality/combustion/ (accessed on 27 Febuary 2014).
31. National Research Council Committee on Health Effects of Waste Incineration. *Waste Incineration and Public Health*; The National Academies Press: Washington, DC, USA, 2000.
32. Chen, S.-J.; Hung, M.-C.; Huang, K.-L.; Hwang, W.-I. Emission of heavy metals from animal carcass incinerators in Taiwan. *Chemosphere* **2004**, *55*, 1197–1205.
33. Chen, S.-J.; Hsieh, L.-T.; Chiu, S.-C. Emission of polycyclic aromatic hydrocarbons from animal carcass incinerators. *Sci. Total Environ.* **2003**, *313*, 61–76.
34. WHO Regional Office for Europe. *Air Quality Guidelines*, 2nd ed.; WHO Regional Office for Europe: Copenhagen, Denmark, 2000.
35. EPA. Polycyclic Aromatic Hydrocarbons. Jan-2008. Available online: http://www.epa.gov/osw/hazard/wastemin/minimize/factshts/pahs.pdf (accessed on 25 July 2013).
36. EPA. Technical Factsheet on: Barium. Available online: http://www.epa.gov/ogwdw/pdfs/factsheets/ioc/tech/barium.pdf (accessed on 25 July 2013).
37. D'Amato, G.; Liccardi, G.; D'Amato, M.; Holgate, S. Environmental risk factors and allergic bronchial asthma. *Clin. Exp. Allergy* **2005**, *35*, 1113–1124.
38. Bernstein, J.A.; Alexis, N.; Barnes, C.; Bernstein, I.L.; Bernstein, J.A.; Nel, A.; Peden, D.; Diaz-Sanchez, D.; Tarlo, S.M.; Williams, P.B. Health effects of air pollution. *J. Allergy Clin. Immunol.* **2004**, *114*, 1116–1123.
39. Maynard, R. Key airborne pollutants—The impact on health. *Sci. Total Environ.* **2004**, *334–335*, 9–13.
40. National Geographic. Air Pollution. Available online: http://environment.nationalgeographic.com/environment/global-warming/pollution-overview/ (accessed on 25 July 2013).
41. Rowat, S.C. Incinerator toxic emissions: A brief summary of human health effects with a note on regulatory control. *Med. Hypotheses* **1999**, *52*, 389–396.
42. Brook, R. You are what you breathe: Evidence linking air pollution and blood pressure. *Curr. Hypertens. Rep.* **2005**, *7*, 427–434.
43. Krewski, D.; Burnett, R.; Goldberg, M.; Hoover, K.; Siemiatycki, J.; Jerrett, M.; Abrahamowicz, M.; White, W. Overview of the reanalysis of the Harvard six cities study and American Cancer Society study of particulate air pollution and mortality. *J. Toxicol. Environ. Health A* **2003**, *66*, 1507–1552.
44. EPA. Extramural Research: Particulate Matter. Available online: http://www.epa.gov/ncer/science/pm/ (accessed on 17 January 2014).

45. Silva, R.A.; West, J.J.; Zhang, Y.; Anenberg, S.C.; Lamarque, J.-F.; Shindell, D.T.; Collins, W.J.; Dalsoren, S.; Faluvegi, G.; Folberth, G.; *et al.* Global premature mortality due to anthropogenic outdoor air pollution and the contribution of past climate change. *Environ. Res. Lett.* **2013**, *8*, doi:10.1088/1748-9326/8/3/034005.
46. United States Geological Survey. Pharmaceuticals, hormones, and other organic wastewater contaminants in US streams. *Environ. Sci. Technol.* **2002**, *36*, 1202–1211.
47. Stackelberg, P.E.; Furlong, E.T.; Meyer, M.T.; Zaugg, S.D.; Henderson, A.K.; Reissman, D.B. Persistence of pharmaceutical compounds and other organic wastewater contaminants in a conventional drinking-water-treatment plant. *Sci. Total Environ.* **2004**, *329*, 99–113.
48. Kolpin, D.; Furlong, E.; Meyer, M.; Thurman, E.M.; Zaugg, S.; Barber, L.; Buxton, H. Pharmaceuticals, hormones, and other organic wastewater contaminants in U.S. streams, 1999–2000: A national reconnaissance. *Environ. Sci. Technol.* **2002**, *36*, 1202–1211.
49. Pill-popping society fouling our water. *CBC News*, 27 March 2006.
50. Daughton, C.G.; Ternes, T.A. Pharmaceuticals and personal care products in the environment: Agents of subtle change? *Environ. Health Perspect.* **1999**, *107*, 907–938.
51. Pomati, F.; Castiglioni, S.; Zuccato, E.; Fanelli, R.; Vigetti, D.; Rossetti, C.; Calamari, D. Effects of a complex mixture of therapeutic drugs at environmental levels on human embryonic cells. *Environ. Sci. Technol.* **2006**, *40*, 2442–2447.
52. Segura-Muñoz, S.I.; Takayanagui, A.M.M.; Trevilato, T.M.B.; Santos, C.B.; Hering, S.E. Trace metal distribution in surface soil in the area of a municipal solid waste landfill and a medical waste incinerator. *Bull. Environ. Contam. Toxicol.* **2004**, *72*, 157–164.
53. Jimenez, B.; Eljarrat, E.; Hernández, L.M.; Rivera, J.; Gonzálezl, M.J. Polychlorinated dibenzo-p-dioxins and dibenzofurans in soils near a clinical waste incinerator in Madrid, Spain. Chemometric comparison with other pollution sources and soils. *Chemosphere* **1996**, *32*, 1327–1348.
54. Oh, J.-E.; Choi, S.-D.; Lee, S.-J.; Chang, Y.-S. Influence of a municipal solid waste incinerator on ambient air and soil PCDD/Fs levels. *Chemosphere* **2006**, *64*, 579–587.
55. Mandal, P.K. Dioxin: A review of its environmental effects and its aryl hydrocarbon receptor biology. *J. Comp. Physiol.* **2005**, *175*, 221–230.
56. Thompson, L.J.; Ebel, J.G., Jr.; Manzell, K.L.; Rutzke, M.; Gutenmann, W.H.; Lisk, D.J. Analytical survey of elements in veterinary college incinerator ashes. *Chemosphere* **1995**, *30*, 807–811.
57. The National Institute for Occupational Safety and Health. Preventing asthma in animal handlers. *NIOSH Alert*, 1998. Available online: http://www.cdc.gov/niosh/docs/97-116/pdfs/97-116sum.pdf (accessed on 9 May 2014).
58. Stave G.M.; Darcey, D.J. Prevention of laboratory animal allergy in the United States: A national survey. *J. Occup.* **2012**, *54*, 558–563.
59. Pacheco, K.A.; McCAMMON, C.; Thorne, P.S.; O'neill, M.E.; Liu, A.H.; Martyny, J.W.; Vandyke, M.; Newman, L.S.; Rose, C.S. Characterization of endotoxin and mouse allergen exposures in mouse facilities and research laboratories. *Ann. Occup. Hyg.* **2006**, *50*, 563–572,

60. Krop, E.J.M.; Doekes, G.; Stone, M.J.; Aalberse, R.C.; van der Zee, J.S. Spreading of occupational allergens: Laboratory animal allergens on hair-covering caps and in mattress dust of laboratory animal workers. *Occup. Environ. Med.* **2007**, *64*, 267–272.
61. Nicholson, P.J.; Mayho, G.V.; Roomes, D.; Swann, A.B.; Blackburn, B.S. Health surveillance of workers exposed to laboratory animal allergens. *Occup. Med.* **2010**, *60*, 591–597.
62. Elliott, L.; Heederik, D.; Marshall, S.; Peden, D.; Loomis, D. Incidence of allergy and allergy symptoms among workers exposed to laboratory animals. *Occup. Environ. Med.* **2005**, *62*, 766–771.
63. Gordon, S.; Preece, R. Prevention of laboratory animal allergy. *Occup. Med.* **2003**, *53*, 371–377.
64. Health and Safety Executive. Occupational Asthma in Great Britain 2013. Available online: http://www.hse.gov.uk/statistics/causdis/asthma/asthma.pdf (accessed on 10 December 2013).
65. Bush, R.K.; Wood, R.A.; Eggleston, P.A. Laboratory animal allergy. *J. Allergy Clin. Immunol.* **1998**, *102*, 99–112.
66. National Institutes of Health Division of Occupational Health and Safety. The National Institutes of Health Laboratory Animal Allergy Prevention Program. 5 Febuary 2014. Available online: http://www.ors.od.nih.gov/sr/dohs/Documents/LAAPP.pdf (accessed on 9 May 2014).
67. CDC—NIOSH Publications and Products—Preventing Asthma in Animal Handlers (97–116). Available online: http://www.cdc.gov/niosh/docs/97–116/ (accessed on 9 May 2014).
68. Glueck, J.T.; Huneke, R.B.; Perez, H.; Burstyn, I. Exposure of laboratory animal care workers to airborne mouse and rat allergens. *J. Am. Assoc. Lab. Anim. Sci. JAALAS* **2012**, *51*, 554–560.
69. Harrison, D.J. Controlling exposure to laboratory animal allergens. *ILAR J.* **2001**, *42*, 17–36.
70. Bush R.K.; Stave, G.M. Laboratory animal allergy: An update. *ILAR J. Natl. Res. Counc. Inst. Lab. Anim. Resour.***2003**, *44*, 28–51.
71. Seward, J.P. Occupational allergy to animals. *Occup. Med. Phila. Pa* **1999**, *14*, 285–304.
72. Seward, J.P. Medical surveillance of allergy in laboratory animal handlers. *ILAR J. Natl. Res. Counc. Inst. Lab. Anim. Resour.* **2001**, *42*, 47–54.
73. Jones, M.; Schofield, S.; Jeal, H.; Cullinan, P. Respiratory protective equipment reduces occurrence of sensitization to laboratory animals. *Occup. Med.* 2014, 64, 104–108.
74. Krakowiak, A.; Szulc, B.; Górski, P. Allergy to laboratory animals in children of parents occupationally exposed to mice, rats and hamsters. *Eur. Respir. J.* **1999**, *14*, 352–356.
75. Smith, J.C.; Bolon, B. Atmospheric waste isoflurane concentrations using conventional equipment and rat anesthesia protocols. *Contemp. Top. Lab. Anim. Sci. Am. Assoc. Lab. Anim. Sci.* **2002**, *41*, 10–17.
76. Taylor, D.K.; Mook, D.M. Isoflurane waste anesthetic gas concentrations associated with the open-drop method. *J. Am. Assoc. Lab. Anim. Sci. JAALAS* **2009**, *48*, 61–64.
77. Fox, J.G.; Anderson, L.C.; Loew, F.M.; Quimby, F.W. *Laboratory Animal Medicine*; Academic Press: Waltham, MA, USA, 2002.
78. Hankenson, F.C.; Johnston, N.A.; Weigler, B.J.; Di Giacomo, R.F. Zoonoses of occupational health importance in contemporary laboratory animal research. *Comp. Med.* **2003**, *53*, 579–601.
79. Weigler, B.J.; Di Giacomo, R.F.; Alexander, S. A national survey of laboratory animal workers concerning occupational risks for zoonotic diseases. *Comp. Med.* **2005**, *55*, 183–191.

80. Cormier, Z. Respiratory virus jumps from monkeys to humans. *Nat. News* 2011, doi:10.1038/news.2011.416.
81. Yu, G.; Yagi, S.; Carrion, R., Jr.; Chen, E.C.; Liu, M.; Brasky, K.M.; Lanford, R.E.; Kelly, K.R.; Bales, K.L.; Schnurr, D.P.; *et al.* Experimental cross-species infection of common marmosets by titi monkey adenovirus. *PloS One* **2013**, *8*, doi:10.1371/journal.pone.0068558.
82. Mullen, W. Monkeys can pose threat. *Chicago Tribune*, 13 December 1997.
83. Bragg, R. A drop of virus from a monkey kills a researcher in 6 weeks. *New York Times*, 14 December 1997.
84. Food and Agriculture Organization of the United Nations. *Livestock's Long Shadow: Environmental Issues and Options*; FAO: Roma, Italy, 2006.
85. Strong, S. U.S. primate import statistics for 2012. *Int. Primat. Trade* 18 January 2013.
86. Eudey, A.A. The Crab-Eating Macaque (*Macaca fascicularis*): Widespread and rapidly declining *Primate. Conserv.* **2008**, *23*, 129–132.
87. Ong P.; Richardson, M. IUCN Red List of Threatened Species: Macaca fascicularis Version 2013.2, 2008. Available online: http://www.iucnredlist.org (accessed on 23 May 2014).
88. Nadler, T.; Thanh, V.; Streicher, U. Conservation status of Vietnamese primates. *Vietnam. J. Primatol.* **2007**, *1*, 7–26.
89. Timmins, R.; Richardson, M.; Changani, A.; Yongcheng, L. IUCN Red List of Threatened Species: *Macaca mulatta*. 2008. Available online: http://www.iucnredlist.org (accessed on 23 May 2014).
90. Akhtar, A. The need to include animal protection in public health policies. *J. Public Health Policy* **2013**, *34*, 549–559.
91. National Research Council. *Animal Biotechnology: Science Based Concerns*; The National Academies Press: Washington, DC, USA, 2002.
92. Dennis, M.B. Welfare issues of genetically modified animals. *ILAR J.* **2002**, *43*, 100–109.
93. Gallup Poll. Older Americans' Moral Attitudes Changing. Available online: http://www.gallup.com/poll/162881/older-americans-moral-attitudes-changing.aspx?version=print (accessed on 20 December 2013).
94. Humane Research Council. The Animal Tracker. Available online: http://spot.humaneresearch.org/content/animal-tracker-wave-4-march-2011 (accessed on 26 February 2014).
95. Lake Research Partners. Ending Cosmetic Testing on Animals in the United States. Available online: http://www.humanesociety.org/assets/pdfs/animals_laboratories/cosmetic_product_testing/cosmetic_testing_poll_results.pdf (accessed on 15 January 2014).

From:
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

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 or community and farm land to be free from Industrial development.

Mike Steeves
775810 Blandford Road
Innerkip, ON

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.

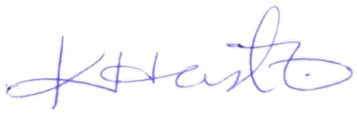
While I understand the County's responsibility to evaluate applications that may support business development, I urge you to carefully consider the potential impacts this project could have on nearby residents and the character of our rural community:

- **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,



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.

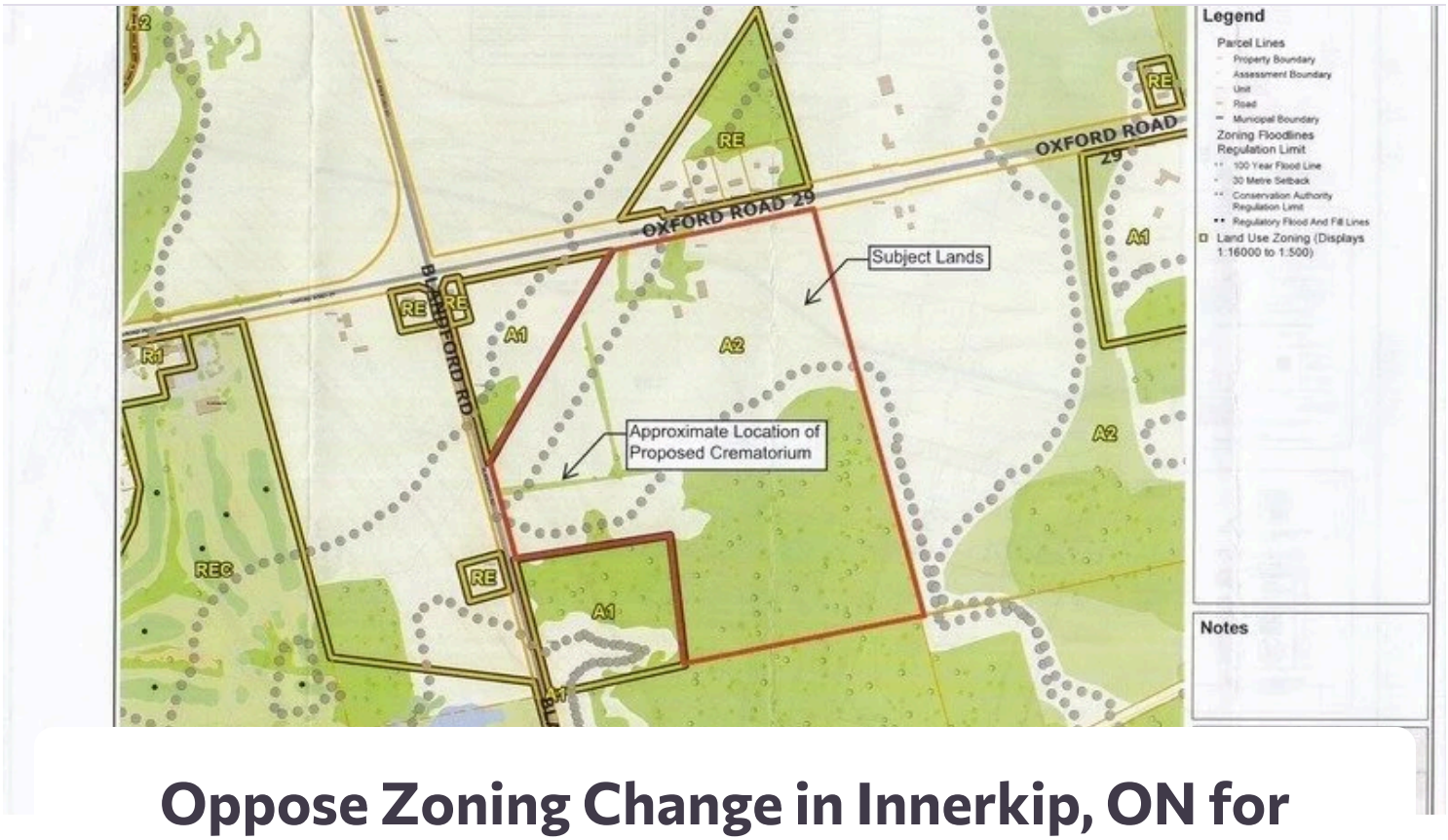
Thank you for considering my concerns.

Patti Lichty

775742 Blandford Road

Innerkip, On N0J 1M0

Start a petition



Oppose Zoning Change in Innerkip, ON for Bowcott Property

Sign petition

192

Verified signatures

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.

generations. Your support is crucial to maintaining our community's character and environment.

Report a policy violation

PaulCheryl ...
Petition Starter

Media inquiries

Supporter Voices

Featured Comments

Emily, Innerkip
3 weeks ago

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

3 Likes Report

Jackie, Innerkip
3 weeks ago

"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"

Support now

John, Woodstock
1 week ago

"Location could be considerably further from residential areas than the planned location."

0 Likes Report

View all comments

Support Change — **Become a Member Today**

Not beholden to politics or power brokers, Change.org is free for people everywhere to make change. Every day there are real victories for issues you care about, only possible because we are 100% funded by everyday people like you.

Will you stand with us to protect the power of everyday people to make a difference?

$4 $10 $15 $20 Other

Support Change.org

Pay with credit card or PayPal

Petition updates

Support now

Name	City	State	Postal Cod	Country	Signed On
PaulCheryl Kornaker	Innerkip		N0J1M0	United States	8/28/2025
Tasha Kornaker	Innerkip		N0J1M0	Canada	8/28/2025
dave robertson	Innerkip		N0J1M0	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		N4S7V9	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	Innerkip		N0J1M0	Canada	8/29/2025
Asif Sultan	Brantford		N0E	Canada	8/29/2025
Russ King	Innerkip		N0J1M0	Canada	8/29/2025
Ryan Husk	Innerkip		N0J1M0	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		NOJ 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
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
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
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
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 ont	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 Lichty	Innerkip		Noj1m0	Canada	9/8/2025
Michael Lichty	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 Lichty	innerkip		N0J1m0	Canada	9/9/2025
Todd Lichty	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
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

Name	City	State	Postal Code	Country	Commented Date	Comment
Jackie Radley	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 Mitchell	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 deeks	Ingersoll		n2c1j9	Canada	9/14/2025	"This isn't healthy and bad for the environment"