

**From:** [glenn@zoocheck.com](mailto:glenn@zoocheck.com)  
**To:** [Economic and Community Development](#)  
**Cc:** [Rob Laidlaw; julie@zoocheck.com](mailto:Rob Laidlaw: julie@zoocheck.com)  
**Subject:** Request to add meet with you regarding our concerns and objection to creation a new Reptilia Exotic Animal Zoo in Toronto]  
**Date:** December 1, 2021 11:00:38 AM  
**Attachments:** [Zoocheck objection to Reptilia request for exemption from Prohibited Animal Bylaw, October 2010.pdf](#)  
[Doctor Gitte Fenger, objection to Reptilia exotic zoo proposal, Nov 2021.pdf](#)  
[Zoologist Ronald Orenstein letter of objection re Reptilia, November, 2021.pdf](#)  
[Captive Reptile Expert Clifford Warwick Opinion and Objection, October 2021.pdf](#)  
[Intl Fund for Animal Welfare Objection to Toronto Reptilia Exception, October 2021.pdf](#)  
[David Suzuki Foundation objection to Reptilia, October 2021.pdf](#)

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Dear City Clerk:

On behalf of Zoocheck Canada, please add the following written letters of objection to granting an exemption to Reptilia Exotic Zoo from the City's Prohibited Animal Bylaw to the agenda and for distribution to the Committee for the December 1, 2021 Economic and Community Development Committee meeting on item 2021.EC26.10, Request to Review Chapter 349, Animals Exception for Reptilia Zoo

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

I have included two sets of information for your review:

- 1.) a summary of the letter we sent to Toronto Animal Services staff regarding our concerns, and
- 2.) a short list of other letters from experts outlining their public health and animal welfare concerns about the proposed exotic animal zoo.

Cheers,

Glenn De Baeremaeker  
Zoocheck Canada

1.) Summary of concerns regarding the proposed new exotic animal zoo in Toronto signed by: Zoocheck Canada, Animal Alliance of Canada, Ontario Captive Animal Watch, Animal Justice and Born Free include:

1. **No compelling case has been presented that would warrant overriding the existing Animal Control Bylaw.**
2. **No public consultation has been conducted on this issue.**
3. **Providing an exemption creates a case for other exotic animal businesses and institutions to also seek exemptions.**
4. **Toronto already has enough zoo and animal facilities and others in the region.**
5. **Toronto Zoo could be financially impacted.**
6. **Toronto Zoo already offers a range of reptile species for viewing and education in a non-commercial setting.**
7. **The City does not have the capacity to provide oversight**

- of large numbers of exotic reptiles and other animals on zoo premises or in MLAPs or to respond when required.
- 8. **Zoo association membership is not a guarantee of optimal animal welfare and high public safety standards.**
- 9. **There will be more Mobile Live Animal Programs (MLAPs) in the City.**
- 10. **An exemption could result in expansion of numbers and species of animals kept.**
- 11. **Potential negative impacts on public health and safety.**
- 12. **Reptilia is a private, commercial zoo business with ancillary business activities, including retail reptile pet supply and food sales, boarding and other services, onsite events and offsite Mobile Live Animal Programs, many that involve interaction with live animals.**
- 13. **Potentially undermining carefully considered, extensively deliberated past improvements to animal welfare in the City.**
- 14. **Substantial departure from past directives of Toronto City Council.**
- 15. **Potentially undermining the City's reputation as a national leader in protecting the welfare of animals.**
- 16. **Concerns by animal welfare groups about commercialization of reptiles and other wildlife.**
- 17. **Supporting expansion of reptile pet keeping and trade.**
- 18. **Potential threats to Toronto's native wildlife.**

2.) List of other letters from experts outlining their public health and animal welfare concerns about the proposed exotic animal zoo:

- 1. Veterinarian Gitte Fenger who states, "Reptiles being a significant source of such pathogens [zoonotic] is a big part of the reason for recommending that high risk people (i.e. those less than 5 years of age, over 65 years of age, pregnant, or immunocompromised) have NO contact (direct or indirect) with reptiles."
- 2. Zoologist Ronald Orenstein, who states, "exotic reptiles are well-know sources of salmonella and other diseases"
- 3. Leading International Expert on Captive Reptile Welfare, Clifford Warwick, who states, " various activities within the Reptilia framework present constant risks to animal welfare and public health and safety."
- 4. Director of Canadian Wildlife Campaigns, International Fund for Animal Welfare, Sheryl Fink, who states, "The exotic pet trade – which is directly and indirectly supported by commercial enterprises such as Reptilia – is widely accepted as being a threat to wild animal populations, disruptive to natural ecosystems, a risk to native wildlife populations wherever non-native exotic pets are kept, and poses an infectious disease threat to human health and safety."
- 5. Wildlife Campaigner, David Suzuki Foundation, Rachel Plotkin, who states, "With increased numbers of exotic animals come increased chances of diseases being transferred to native wildlife species (especially if animals are released), as well as to humans (particularly if they physically contact the animals)."



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Animal Justice

*Leading the legal fight for animal protection*



October 13, 2021

Dr. Esther Attard  
Director, Toronto Animal Services  
821 Progress Avenue,  
Toronto, Ontario M1H 2X4

Dear Dr. Attard:

Please accept this letter as our formal request for you to recommend against providing an exemption to the City of Toronto Municipal Code 349, Prohibited Animals exceptions list (the “Animal Control Bylaw”) as requested by Reptilia, which would facilitate the creation of a new private, commercial exotic zoo business keeping and displaying prohibited animals in the City of Toronto.

Our request is based on a number of general and specific concerns that include, but are not limited to, the following:

**1. No compelling case has been presented that would warrant overriding the existing Animal Control Bylaw.**

We are not aware of any compelling or convincing case being presented that would warrant providing an exemption to Reptilia or that addresses the various issues associated with their request. We are aware of a letter from a local City Councillor who states, “The proposed tenant would provide the waterfront with another key tourist attraction...” We are not aware of any kind of analysis regarding potential drawbacks of providing an exemption, including possible negative impacts on other attractions, such as the Toronto Zoo, elevated risks to public health and safety through exposure to exotic animals, increased costs for providing oversight and responding to nuisance issues, enhanced risks to local wildlife and environments, broader concerns regarding facilitating activities that normalize the keeping of exotic animals and that provide support services for the exotic pet trade and, lastly, potential negative animal welfare impacts, particularly in significant numbers of new Mobile Live Animal Programs (MLAPs).

*c/o Zoocheck, 788 ½ O’Connor Drive, Toronto, Ontario, M4B 2S6  
(416) 285-1744, zoocheck@zoocheck.com*

The Economic and Development Committee request specifically asks City staff to provide “a recommendation on whether or not to include the facility under the Prohibited exceptions ...”. City Councillors should not make important policy decisions without the benefit of a definitive, professional City staff recommendation based on evaluation of **all** relevant issues, especially when the welfare and lives of animals are concerned. In a progressive and humane City these other issues must be factored in and should not be pushed aside by unsubstantiated claims of tourism potential. We suggest that proper consideration of these issues should result in a recommendation that Reptilia’s request for an exemption to the Animal Control Bylaw be denied.

**2. No public consultation has been conducted on this issue.**

An exemption for a private commercial zoo business that would allow the keeping of prohibited animals in the City will be concerning to a very large number of Torontonians. We believe it would reverse some of Toronto’s progress in dealing with exotic animal issues, undermine several previously passed progressive measures, facilitate the normalization of exotic pet keeping and potentially result in a growth in the number of reptiles and other exotic pets in Toronto. No exemption should be considered without a broader public consultation process on this important matter being conducted.

**3. Providing an exemption creates a case for other exotic animal businesses and institutions to also seek exemptions.**

Providing an exemption to the Animal Control Bylaw for a private commercial zoo business creates a precedent that other types of businesses, including exotic animal businesses, may try to exploit to gain access to the City of Toronto market.

**4. Toronto already has enough zoo and animal facilities and others in the region.**

The City of Toronto currently has three zoos operating within its boundaries: High Park Zoo, Toronto Zoo and Ripley’s Aquarium of Canada. The High Park Zoo contains a small collection of domesticated and exotic mammal and bird species, but none that are considered particularly challenging or high risk. As well, they do not conduct offsite, live animal programs in which animals are brought into the community.

The Toronto Zoo live collection consists of broad range of exotic animal species from around the world. The zoo conducts only a tiny number of offsite activities annually. Ripley’s Aquarium of Canada features a large collection of aquatic species, but does not conduct offsite live animal programs.

In addition, there are sundry other exemptions to the prohibited animal provisions of the Animal Control Bylaw, such as the Riverdale Farm where a variety of domesticated livestock species can be found. As well, numerous MLAP businesses operate in the City with non-prohibited exotic animals.

Ample opportunities for viewing wildlife and other animals in captivity already exist in the City and there is no compelling reason to add additional private commercial zoos to the mix.

**5. Toronto Zoo already offers a range of reptile species for viewing and education in a non-commercial setting.**

The Toronto Zoo already offers an expansive range of reptiles, including both common and rare species, that are maintained for public display and education in a variety of enclosure-types throughout the zoo. The Toronto Zoo's husbandry and presentation standards exceed those of most other institutions and businesses and they are guided by recognized conservation principles. They do not conduct shows or other offsite commercial activities, such as children's parties, using these animals.

**6. Toronto Zoo could be financially impacted.**

An exemption has the potential to negatively impact the Toronto Zoo and the Toronto taxpayer financially. The City should not provide exemptions to businesses that may compete against the Toronto Zoo for patronage.

The Toronto Zoo is recognized as an attraction of considerable regional importance and as a significant local economic driver which has suffered substantial financial hardship during the COVID-19 pandemic. The City should be protecting its long-term investment in the Toronto Zoo as the facility gradually moves into its post-COVID recovery phase.

A new zoo filled with prohibited, sometimes dangerous, exotic wild animals could lead to a direct financial loss for the Toronto Zoo, thus burdening City Council and Toronto residents with the necessity to provide even larger operating subsidies than are currently provided.

In a March 14, 2017 email from Jack Adams, Manager, Business Growth & Retention, The London Economic Development Corporation, to Adam Salton, Manager, Zoning and Public Property Compliance, City of London, Mr Adams said, "I asked a few questions to help us gather details...What sort of tourism impacts would a facility like this attract?" The answer from Reptilia was, "We anticipate that we will host between 400,000 and 600,000 guests per year". Toronto is six times larger than the City of London so, presumably, Reptilia could see attendance exceed that anticipated in London. If so, that could result in decreased attendance and revenues at the Toronto Zoo as people decide not to make the moderately more challenging trip out to the Scarborough zoo site.

It should be noted that while Ripley's Aquarium of Canada also displays wildlife to the public, it does not duplicate what visitors encounter at the Toronto Zoo. The Aquarium, which features primarily aquatic animal species, provides a very different experience than the Toronto Zoo, which features primarily terrestrial animal species.

**7. The City does not have the capacity to provide oversight of large numbers of exotic reptiles and other animals on zoo premises or in MLAPs or to respond when required.**

The Province of Ontario does not license or regulate the keeping or display of exotic wild animals, so oversight and control of exotic animals is largely the responsibility of the

municipalities in which they reside. Toronto Animal Services does not have the internal expertise to provide meaningful oversight of large numbers of exotic reptiles and other exotic animals, nor does it have the capacity, financial or otherwise, to monitor those animals in ongoing MLAP activities throughout the City. While Toronto Zoo staff could presumably assist in some cases, that would simply result in shifting the costs of those activities to the Toronto Zoo, which can ill afford any additional financial burden.

The Ontario government's Provincial Animal Welfare Services inspectorate, that focuses largely on individual instances of animal abuse and neglect after they have occurred, also does not have the capacity to provide meaningful oversight of ongoing exotic animal business activities in dozens or hundreds of temporary venues.

#### **8. Zoo association membership is not a guarantee of optimal animal welfare and high public safety standards.**

Accreditation by a zoo association is often promoted as a sign that an institution is adhering to high animal welfare and public safety standards but it is not a guarantee that animal welfare is optimal or that public safety is ensured. Throughout the years, a number of accredited facilities in Canada have been subject to official investigations and provincial animal cruelty charges associated with a variety of issues.

Reptilia is accredited by Canada's Accredited Zoos and Aquariums (CAZA). The organization's accreditation inspections are infrequent, normally occurring just once every five years and the inspection results are confidential. In addition, CAZA's standards are largely performance-based and subjective, unlike the standards of other accrediting bodies, such as the Association of Zoos and Aquariums (AZA) and the Global Federation of Animal Sanctuaries.

It should be noted that both the Toronto Zoo and Ripley's Aquarium are accredited by the AZA and must adhere to the more stringent prescriptive measures contained in their accreditation standards.

#### **9. There will be more Mobile Live Animal Programs (MLAPs) in the City.**

MLAPs are a significant facet of the Reptilia business that they actively promote to businesses, institutions, organizations and individuals wherever they are located.

A 2018 Sales Representative job advertisement on Reptilia's Facebook page provides an idea about who they reach out to for MLAP sales. The ad said they were looking for talented sales people for the GTA and Durham regions with experience making grassroots connections with the public, attending conferences and trade shows, a proven track record of effectively selling to the public and a background, is preferred, in one or more of the following sectors:

- Auto Dealers
- Camps
- Child Care Centres
- Community Centres

- Events Planning
- Fairs, Festivals & Exhibitions
- First Responders
- Hospitals
- Hotels
- Libraries
- Museums
- Religious Organizations
- Retail, Malls & Shopping Centres
- Scouts, Guides, 4-H & Other Youth Groups
- Schools/Schoolboards: Elementary, Secondary & College/University
- Ticket & Corporate Admission Sales
- Wrangling/Film

The full or part-time jobs were commission based, with rates based on the volume of sales and type of programs sold.

#### **10. An exemption could result in expansion of numbers and species of animals kept.**

Providing an exemption to the Animal Control Bylaw would allow Reptilia an unfettered ability to keep and display almost any animal species at their zoo site. An increase in the number and range of species being kept, including animals never previously envisioned such as large, dangerous or otherwise problematic species, is possible. That has occurred in many zoo and zoo-type facilities across the province in the past. This expansion has often resulted when businesses look for new attraction animals as a way of maintaining or increasing visitor numbers and revenue.

#### **11. Potential negative impacts on public health and safety.**

Most public health and other governmental agencies recognize the health and safety risks associated with exposure to exotic animals. The City of Toronto's approved staff report LS20.1 Prohibited Animals Review, May 31, 2017, states,

“Many MLAPs provide an opportunity to interact, pet and handle animals both permitted and prohibited. This creates a risk of zoonotic disease transmission through direct (feeding, touching, handling of animals) and indirect contact (exposure to animal bedding, flooring, barriers, bowls/dishes and clothing/shoes that have been contaminated by the animal.” (p. 12).

The report also says,

- the “Ministry of Public Health and Long-Term Care and Toronto Public Health has identified some animals that may present a higher risk of disease transmission and should not be invited to childcare centres or be exposed to at risk population groups. These animals include ... reptiles (turtles, snakes, lizards) ...” (p. 12-13)

- the City prohibitions, “included most reptiles that may present a significant risk to public health and safety.” (p. 2)
- “Venomous or poisonous creatures are prohibited because they pose a risk of danger to the public.” (p.9)
- the opportunity to interact with exotic animals “creates a risk of zoonotic disease transmission through direct (feeding, touching, handling of animals) and indirect contact (exposure to animal bedding, flooring, barriers, bowls/dishes and clothing/shoes that have been contaminated by the animal.” (p.12)
- “Gastrointestinal infections are the most common infections resulting from animal contact and these include Salmonella and E. coli, causing diarrhea and/or vomiting and in some cases more serious illnesses.” (p. 12)

The 2021 Reptilia website states, “one or more of our friendly and outgoing Hosts will come to your venue with an assortment of scaly, fantastic creatures prepared to interact with your guests ... Your attendees will be able to interact and touch, should they wish to, with the reptiles, ...” and offers “live interactions for guests of all ages”.

Given the enhanced awareness and concern about viral diseases due to the COVID-19 pandemic, the SARS emergency of 2003-4, and the emergence of various other epidemics of animal origin, including BSE, swine flu and others, live animal activities that could create elevated disease risks to vulnerable residents of Toronto, including children under 5 years of age, persons over 65 years of age, immune-compromised individuals, pregnant women and developmentally challenged individuals should not be encouraged or facilitated.

**12. Reptilia is a private, commercial zoo business with ancillary business activities, including retail reptile pet supply and food sales, boarding and other services, onsite events and offsite Mobile Live Animal Programs, many that involve interaction with live animals.**

In addition to their zoos, Reptilia incorporates a diverse suite of other business activities including retail sales of reptile pet supplies and food, reptile boarding services and, in future, veterinary services (which the Reptilia website states are “coming soon.”) These activities all support reptile pet keeping and service the reptile pet trade.

It should be noted that Reptilia promotes the idea that some reptiles can make good pets. The Reptilia website states, “...there are certain species that make good choices for many people” and that characteristics of great reptile pets include having “relatively easy care requirements that are simple to provide for at home.” Since Reptilia is in the pet products business, it could be argued that a growth in reptile pet keeping results in greater profits for Reptilia.

The Reptilia business model also includes a range of fee-based onsite activities, including children’s parties, camps (such as summer and Passover camps), animal meet and greets, courses, tours and special events. Rental spaces are also available to external parties.



Fee-based offsite activities include a broad range of Mobile Live Animal Programs (MLAPs), including meet and greets, mobile zoos, displays, stage shows and rental of animals for keeping in schools. Many animal welfare experts suggest that bringing exotic wild animals out into the community, especially for interactive activities with members of the public, is a gateway to the normalization of exotic pet keeping and trade.

**13. Potentially undermining carefully considered, extensively deliberated past improvements to animal welfare in the City**

Prior to changes to Toronto's Animal Control Bylaw being made in 2017, the City engaged in a substantive research initiative and extensive public consultation, including about its prohibited animal provisions, receiving more than 2,500 public responses. The changes that resulted from that process included measures to protect domesticated, exotic and wild animals and included further restrictions on Mobile Live Animal Programs (MLAPs) being conducted in the City. Providing an exemption to a private commercial zoo business that includes an extensive MLAP component severely undermines the forward movement that was achieved in 2017.

**14. Substantial departure from past directives of Toronto City Council.**

For many years, Toronto has actively pursued measures to protect the health and welfare of animals. This longstanding trend began in the 1990s when Toronto established an international precedent by becoming the first major city in the world to pass a bylaw prohibiting wild animals in circuses from visiting the City. Since that time, hundreds of jurisdictions around the world followed Toronto's lead by taking similar action. Toronto has continued throughout the years to move forward with dozens of progressive measures to protect animals of all kinds. Providing an exemption that would allow a private commercial zoo business to keep, display and use prohibited exotic animals in the City could be viewed as a reversal of that trend.

**15. Potentially undermining the City's reputation as a national leader in protecting the welfare of animals.**

In recent years, Toronto City Council has approved numerous progressive measures that are meant to safeguard the health and welfare of domesticated, exotic and wild animals. They include measures to reduce wild bird/building collisions, removing the exemption for zoos to conduct MLAPs with prohibited animals in the City, adding new animals to the City's prohibited animals list, moving the three Toronto Zoo elephants to a world-renowned sanctuary in the United States and, recently progressive measures to help companion animals in need during the pandemic. Toronto has gained a positive reputation as a proactive, humane, animal friendly City. This reputation may be diminished if a private commercial zoo business is provided with an exemption to the Animal Control Bylaw.

The

## **16. Concerns by animal welfare groups about commercialization of reptiles and other wildlife.**

Numerous animal protection organizations in Toronto and elsewhere have expressed a variety of concerns about animals held in private commercial zoo businesses and MLAPs. They include, but are not limited to, animal welfare concerns, such as lack of space, rudimentary environmental conditions and stress due to being transported, handled (even short-term gentle handling) or when engaged in interactive activities with the public.

In addition, a broader concern exists about the normalization and popularization of keeping reptiles and other exotic animals as pets as experts believe this is a factor in the growth of the exotic pet trade.

It should be noted that the exotic pet trade is widely accepted as being a threat to wild animal populations and the survival of many individual species, disruptive to natural ecosystems, a risk to native wildlife populations wherever non-native exotic pets are kept, an infectious disease threat that may impact human health and safety and a cause of suffering and death to millions of animals annually. The exotic pet trade encompasses tens of millions of captive-bred and wild caught animals throughout the world and is now considered a major animal welfare and conservation issue. No one knows exactly how many exotic animals are currently in Canada or that are imported each year.

## **17. Supporting expansion of reptile pet keeping and trade.**

A Toronto Reptilia will likely include – as it does at its other facilities – ancillary uses, such as retail reptile pet supply and food sales, boarding and other services, that support the keeping of reptiles and other exotic pets. On their website, Reptilia states that their reptile stores are, “... a paradise for the reptile enthusiasts... with a wide selection of enclosures, lighting, décor, books and supplements for all reptile needs...” Promoting reptile pet product sales and services supports reptile pet keeping and encourages its expansion.

It should be emphasized that the three existing Toronto zoos do not sell exotic pet products, do not provide services that support the exotic pet trade and do not engage in an ongoing, broad range of offsite commercial activities that may facilitate the normalization wild animal pet keeping.

## **18. Potential threats to Toronto’s native wildlife.**

With increasing numbers of exotic pets come increasing numbers of people who discard them by releasing them into the wild. This can have serious negative consequences for native wildlife species who are outcompeted by foreign invaders, when the new species alter or damage habitat or when new disease organisms are introduced. Toronto has already experienced goldfish, koi and red-eared slider turtles being released into numerous local waterways where they have established themselves. In addition, close to 70 other invasive species of fish, most thought to have come from released pets, have been found in the Great Lakes.

Chytrid fungus, probably the most famous disease to come from pet trade animals, has decimated a multitude of frog species around the world and a similar fungal disease is now working its way through wild salamander populations. The disease risk from the pet trade cannot be underestimated.

Many exotic animal species have survived and established themselves in locations and climates where it was previously believed they could not. As well, with environmental conditions in a state of flux due to climate change, there may be many more exotic species, and new diseases, that will be able to survive in the City as well. City staff should be looking to reduce the number of exotic animals to protect the plants and animals that currently reside in our precious green spaces and wildlife habitats.

On behalf of the animal welfare organizations listed below, we request that City staff formally recommend against Reptilia's request for exemption to Toronto's Animal Control Bylaw.

Sincerely,

Rob Laidlaw  
CBiol MRSB, Executive Director  
Zoocheck Inc.

Liz White  
Executive Director  
Animal Alliance of Canada

Camille Labchuk  
Executive Director  
Animal Justice

Barry Kent MacKay  
Director of Canadian and Special Programs  
Born Free USA

Diane Fraleigh  
Representative  
Ontario Captive Animal Watch



November 7, 2021

Dear Dr. Esther Attard,

I am writing to share with you my strong opposition to granting Reptilia an exemption to the Toronto animal control bylaw that would allow them to keep prohibited animals in the city. I encourage you to ensure that Toronto's citizens and visitors continue to be protected from the inherent health and safety risks that such a facility would pose, not the least of which is being exposed to dangerous pathogens.

As a veterinarian with 21 years of experience, zoonotic pathogens are important to me. Reptiles being a significant source of such pathogens is a big part of the reason for recommending that high risk people (i.e. those less than 5 years of age, over 65 years of age, pregnant, or immunocompromised) have NO contact (direct or indirect) with reptiles ([www.wormsandgermsblog.com](http://www.wormsandgermsblog.com)). Unfortunately too many people acquire animals based on liking a certain look, without having the means to properly care for them. A reptile zoo is likely to increase reptile ownership, possibly even of prohibited ones, because the more people see animals, the more want them for themselves. Permitting a reptile zoo in Toronto will send the wrong message to the community.

Healthy relationships between people and animals is my passion which is why, in addition to running Park Animal Hospital, I am the Ontario Director for the Paw Project (a California-based movement to end declawing of cats) and a member of the Grey Bruce Aboriginal Qimmiq Team, a group dedicated to providing veterinary care to remote indigenous communities.

Thank you for your time and the important work that you do. Please do not hesitate to reach out if you have any questions or could further use my assistance in this or other animal matters.

Yours sincerely,

Dr. Gitte Fenger

Cell: 647-822-8464

[gitte@parkanimalhospital.ca](mailto:gitte@parkanimalhospital.ca)

**Ronald Orenstein, Ph.D., LL.B.**  
**1825 Shady Creek Court**  
**Mississauga, Ontario**  
**L5L3W2**

Dr. Esther Attard  
Director, Toronto Animal Services  
821 Progress Avenue,  
Toronto, Ontario  
M1H 2X4

Dear Dr. Attard:

Re: Application by Reptilia for exemption under Municipal Code 349

I am writing this letter to ask you, in your capacity as Director of Toronto Animal Services, to recommend against allowing an exception to City of Toronto Municipal Code 349, Prohibited Animals exceptions list (the “Animal Control Bylaw”) in order to allow Reptilia to establish a facility for the public display of exotic animals in the City of Toronto.

I am a zoologist and lawyer with over thirty-five years’ experience in issues surrounding the international trade in wildlife, including participation as a Registered Observer since 1987 at meetings of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). I am the author of twelve books on wildlife and wildlife conservation, including *Turtles, Tortoises and Terrapins: A Natural History* (2012, Firefly Books). I am also a member of three Species Specialist Groups of the Species Survival Commission of the International Union for the Conservation of Nature (IUCN), including the Tortoise and Freshwater Turtle Specialist Group.

My concern about the present application relates to two interrelated issues of increasing public interest and importance. The first is the role of exotic animals in the spread of communicable disease. Although reptiles have not as yet been identified as the source of epidemic-causing pathogens that can be transferred from person to person, exotic reptiles are well-known sources of salmonella and other diseases. Concern over such diseases is a major reason why juvenile turtles are no longer displayed for sale as pets in department stores and similar venues.

Today we are increasingly aware of the risks of disease transmission from animals to humans, including transmission by contact with exotic pets including reptiles. According to one recent review<sup>1</sup>, “Exotic pets (e.g., small mammals, reptiles, amphibians, fish, and birds) may be carriers of several zoonotic viruses (e.g., Crimean-Congo hemorrhagic fever virus, West Nile virus, arenaviruses), bacteria (e.g., *Salmonella* spp., *Yersinia pestis*), and parasites (e.g., *Giardia duodenalis*, *Cryptosporidium parvum*, *Toxoplasma gondii*, *B. procyonis*). For example, zoonotic *Salmonella enterica* serotypes, previously associated with human outbreaks of reptile-related

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<sup>1</sup> Bezerra-santos, M. A., Mendoza-Roldan, J. A., Thompson, R. C. A., Dantas-Torres, F., & Otranto, D. (2021). Illegal Wildlife Trade: A Gateway to Zoonotic Infectious Diseases. *Trends in Parasitology*, 37(3), 181–184. <https://doi.org/10.1016/j.pt.2020.12.005>

salmonellosis, were detected in tortoises (*Testudo graeca*) illegally imported from North Africa to Italy, bringing risks of human infection with pathogenic *Salmonella*.”

The second issue of concern, closely related to the first, is that the international trade in exotic pet animals, and particularly in reptiles and amphibians, presents a major threat to the survival of many rare species<sup>2</sup>. Much of this trade is known to be illegal and unsustainable, including trade in animals falsely claimed to have been bred in captivity but actually taken from the wild. Mortality in the course of capture and shipment is often high, and animals may arrive at their end markets already diseased.

The exotic pet trade is driven by demand. Buyers of exotic pet reptiles or amphibians are often unaware of the ultimate source of their animals. They may not know how to take care of them properly, especially when they grow large. This can lead to accidental or purposeful attempts to ‘dump’ unwanted animals into the wild. For hardier species such as some turtles, this could lead to the establishment of exotic populations that could potentially transmit diseases to native animal populations. Trade in exotic frogs has been identified as a major source of the spread of chytridiomycosis to native amphibians<sup>3</sup>. This and related diseases have already been blamed for the extinction of at least 200 amphibian species worldwide.

Steps to reduce the risk to both public health and species survival posed by the trade in exotic pets are being increasingly taken worldwide. By allowing the proposed exemption, and potentially increasing the possible risks of disease transmission to both people and native wildlife by promoting, directly or indirectly, the demand for exotic pet reptiles and amphibians, Toronto would be moving in the opposite direction. I urge you to recommend against taking such a retrograde step.

I am aware that Reptilia does not offer live reptiles for sale. Nor do I mean to suggest that Reptilia is in any way directly associated with the illegal trade in live wildlife. However, by allowing the sale of pet supplies as part of its activities it may promote demand for the keeping of exotic reptiles as pets, including species that are prohibited under the existing bylaw and others that, although they are not currently prohibited, could pose a risk to public health. This risk may be of special concern under circumstances that allow (and even encourage) young children to come into physical contact with live reptiles.

In my view concerns such as these outweigh the arguments that have been presented in favour of granting the exemption requested by Reptilia. Excluding facilities such as Reptilia from Toronto was, in my understanding, one of the main justifications for adopting the bylaw in the first place.

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<sup>2</sup> Auliya, M., Altherr, S., Ariano-Sanchez, D., Baard, E. H., Brown, C., Brown, R. M., Cantu, J., Gentile, G., Goldenhuys, P., Henningheim, E., Hintzmann, J., Kanari, K., Krvavac, M., Lettink, M., Lippert, J., Luiselli, L., Nilson, G., Quang, T., Nijman, V., ... Ziegler, T. (2016). Trade in live reptiles, its impact on wild populations, and the role of the European market. *Biological Conservation*. <https://doi.org/10.1016/j.biocon.2016.05.017>

<sup>3</sup> Hanlon, S. J. O., Rieux, A., Farrer, R. A., Rosa, G. M., Waldman, B., Bataille, A., Kosch, T. A., Murray, K. A., Brankovics, B., Fumagalli, M., Martin, M. D., Wales, N., Alvarado-Rybak, M., Bates, K. A., Berger, L., Böll, S., Brookes, L., Clare, F., Courtois, E. A., ... Bosch, J. (2018). Recent Asian origin of chytrid fungi causing global amphibian declines. *Science*, 360(6389), 621–627. <https://doi.org/10.1126/science.aar1965>

It is not as though residents and tourists do not already have an opportunity to see exotic animals in the greater Toronto area. Toronto Zoo is recognized a world-class facility, and Reptilia itself already operates facilities in Vaughan and Whitby that are in easy reach of those desiring to visit them.

I would be glad to provide you with further information on these issues, including further reference to recent scientific studies. I hope, however, that for the reasons expressed in this letter you will recommend against allowing an exemption to Municipal Code 349 for Reptilia or, indeed, for any similar facility in future.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Orenstein", with a long horizontal flourish extending to the right.

Ronald Orenstein !

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**On the matter of:**

‘Reptilia’

OPINION STATEMENT

**Remit and professional introduction**

At the request of Zoocheck Canada I have been asked to provide a brief commentary regarding certain activities associated with the operations of ‘Reptilia’, with a focus on general welfare issues and some of the zoonoses risks associated with onsite handling experiences and offsite mobile live animal programs (MLAPs).

By way of professional introduction, my relevant qualifications include Chartered Biologist (primarily reptile biology), Chartered Scientist (primarily reptile biology), Registered European Professional Biologist (primarily reptile biology), Fellow of the Royal Society of Biology (primarily reptile biology), and a doctorate (reptile welfare biology). I also graduated from the University of Leeds Medical School, where I qualified in human primary healthcare and medical science, having specialised in zoonoses - diseases transmissible between animals and people. My research and publishing background extend to over 150 peer-reviewed papers, book chapters, books (including as contributing editor for the definitive scientific reference volume on reptile welfare), and other scientific publications in reptile biology, animal welfare, human medical science, and control of infectious diseases. Aside from scientific research, publication, and education, I am also a regular lecturer on all related topics to the international community, and further, my work involves acting as a formal consultant on exotic animal welfare, public health and safety, and ecological issues to numerous governments.



## Issues and statement

### 1. . *Reptilia*

'Reptilia' is a commercial enterprise that, as examples of its operations, offers both onsite (zoo facilities, animal exhibitions, products) and offsite (mobile live animal programs [MLAPs], stage shows, animal rentals).

### 2. . *Joint letter*

At the request of Zoocheck Canada, I read a letter dated 13<sup>th</sup> October, 2021 that was jointly provided to Toronto Animal Services by Zoocheck Inc., Born Free USA, Animal Alliance of Canada, Ontario Captive Animal Watch, and Animal Justice, which outlined numerous concerns regarding the activities of Reptilia. I considered the points raised in the letter with regard to their objectivity and scientific robustness. In particular, the joint letter sets out several concerns that expansion of certain of Reptilia's activities would significantly increase animal welfare and public health and safety problems. I can confirm that in my professional opinion the contents of that letter are strongly justified and supported by widely available robust scientific evidence, which demonstrates that both animal welfare and public health and safety problems are strongly endemic to captive animal welfare as well as animal interactions with the public, in particular regarding mobile activities, and moreover especially where children and other vulnerable groups are involved.

3. . At the request of Zoocheck Canada, I also viewed numerous (246) still and moving images depicting husbandry and other conditions and practices at Reptilia zoo facilities. While a number of images showed vivaria conditions that are consistent with general zoo standards, there were also numerous examples that depicted problematic captive-stress-related behaviours and poor husbandry, including:

- a. perimeter tracking behaviour, assessed via occupancy evaluation showing particular activity routes recorded in the substrate;
- b. probable co-occupant harassment behaviour;
- c. stress-related interaction with transparent boundaries (ITB) behaviour;
- d. exploratory escape/ITB behaviour;
- e. spatially overly-restrictive conditions that do not permit snakes to fully stretch in all three dimensions (which is contrary to the latest scientific evidence-based recommendations) <sup>(1)</sup>;

- f. general spatial restrictions that do not permit essential normal behaviour such as swimming;
- g. lack of diversity of thermal zones;
- h. lack of habitat diversity;
- i. lack of suitable substrates.

The various issues listed above are well-established indicators of captivity-stress and poor husbandry, for which further general background information is provided below under '*Animal welfare*'.

#### 4. . *Zoonoses, public health and safety, epidemics and control*

Reptiles are a notorious source of human salmonellosis and are also increasingly recognised as being causally-related to other infections <sup>(2,3)</sup>. Approximately 70,000 cases of pet reptile-associated human salmonellosis occur in the US annually, and around cases 6,000 in the UK annually - equal to approximately 6% of all salmonella infections <sup>(2,4)</sup>. Although it can be argued that certain human foods present a greater source of salmonella infection, reptiles constitute a disproportionately great source; for example, research shows that 27% of all children hospitalised with salmonellosis acquired their infections from pet reptiles <sup>(5)</sup>.

Moreover, at least 40 pathogenic human infections are known to be associated with reptiles, and at least 70 are associated with exotic pets generally <sup>(2)</sup>. Indeed, reptiles are known as 'Trojan horse' animals, because they are often invited into homes and schools on the basis of being presumed benign whereas, in fact, they may harbour a significant raft of pathogens, regardless of whether they are wild-caught or captive-bred. Furthermore, because the mechanisms of supply of exotic animals for display/pet purposes involves diverse sourcing and intermingling of animals at many hubs, opportunities for cross-pollination of microbes is a major and growing concern <sup>(6)</sup>. The typical worrying presence of exotic pathogens in reptiles and other wild animals (whether wild-caught or captive-bred) is compounded by the common fact that animals in trade and keeping are frequently in poor or highly uncertain health states, and their origins become obscured by the intermingled supply process. Relatedly, zoonosis often superficially resemble everyday conditions such as fever, gastrointestinal disease, dermatitis, and influenza, thus their incidence and prevalence are likely relatively common and under ascertained.

These various factors result in significant unpredictability regarding what types of pathogens may be occupying any individual animal. Trace-back of pathogenic sources is also frequently thwarted by these supply hub obscurities. Consequently, epidemics or pandemics become extremely difficult to control.

##### 5. . *Animal welfare*

Welfare science relevant to reptiles is a highly complex issue, and increasingly recognised as out of scope for those not fully qualified in both animal welfare and herpetological science. Frequently, many presumptions are made that imply that basic spatial, dietary, thermal, lighting, and humidity ranges are adequate, behavioural needs are simple, and that reptiles are easy to keep. All of those claims are entirely false, and promoted by commentators who lack appropriate scientific credibility. It has become clear during research over the past several years in particular that all provisions such as those mentioned above must be present in abundance - whether space, habitat diversity, temperature variation, and others, and that reptilian sentience and behaviour rivals if not exceeds that of many traditionally appreciated animals. In addition, reptiles are biologically highly innate, meaning that whether wild-caught or captive-bred, they have specific psychological and behavioural needs (such as space and constant habitat diversity) that are linked to ancestral biological traits <sup>(7,8)</sup>.

Accordingly, the needs of reptiles in captivity are rarely if ever fully met, and this phenomenon is known as ‘controlled deprivation’ <sup>(7)</sup>. Controlled deprivation is associated with the best zoological facilities; thus, it can be presumed that all sub-zoo standard settings (which includes all onsite handling experiences and offsite MLAPs) further and significantly degrade animal welfare.

There are now numerous high-level, peer-reviewed, scientific reports that confirm the sensitivity of reptiles to captivity-associated stressors (including handling) <sup>(9,10)</sup>. These reports make clear that many (at least 30) documented signs of stress are regularly observable in captive reptiles, but that often these signs are only readily recognised by specifically qualified and experienced reptile behaviourists. Therefore, it is likely that neither animal handlers nor local authority inspectors would possess the scientific

knowhow to make objective informed assessments of the welfare states of reptiles at events where their welfare is likely to be at risk.

#### 6. . *Static zoos versus onsite handling experiences and offsite MLAPs*

Static zoos are not free from criticism in terms of animal welfare. However, animals at static zoos are proportionately better insulated against human disturbances associated with sound, vibration, light, smell, and visual confrontation than animals at onsite handling experiences and offsite MLAPs - which are strongly exposed to all such disturbances. These disturbances are now well-known to impose significant stressors of reptiles and other animals <sup>(9,11,12,13)</sup>.

Although an animal may cope relatively well with a single stressor event (such as a single sound disturbance or movement), repeated or multiple stressor events (known as 'microstressors') may be considered harmful both in the short and long terms. These negative situations arise because microstressors probably do not allow animals to fully recover before the next stressor event, resulting in cumulative stress, maladaptation, and disease.

Furthermore, specific biological factors such as common nocturnalism mean that for many species, being moved or handled during their normal rest periods (our 'awake' periods) compounds disturbance issues. Also, welfare assessments cannot usually be well performed for nocturnal species (which includes many snakes) because their activity patterns and behaviours signalling health states are not observed due to the contrary diurnal behaviour patterns of humans.


Static zoos are known to be sources of zoonotic outbreaks involving reptiles and other animals, including some relatively large episodes involving hundreds of people from a single reptile exhibit <sup>(2)</sup>. Nevertheless, infection risks at static zoos can be strongly mitigated in part due to the established architectural layout and thus the predictability of circumstances and events. In contrast, MLAPs manifest at highly diverse sites that are significantly beyond public health and safety managemental predictability, and therefore present a disproportionately great risk both of zoonotic disease and (where potentially dangerous animals such as large snakes, large lizards, large turtles, and crocodilians are involved) of human injury. Of note, contrary to common claims that

certain large snake and large lizard species can be ‘tame’ or not aggressive, many incidences exist of highly injurious attacks and some deaths from perceived docile individuals.

Significantly, a new scientific and veterinary report by a panel of 22 experts for the International Association of Human Animal Interaction Organisations (IAHAIO) looking at diverse aspects (including animal welfare and zoonotic risk) associated with relevant events such as mobile handling experiences, concluded that: *“1.7 Wild animals and exotic species, including those kept as pets, must not be involved in AAI as their needs cannot be met. Their stress signals are poorly understood, they rarely remain in good health, usually have a shortened lifespan in captivity, and they pose a high zoonotic risk. There are also serious concerns about high mortality during transit, and ecological species depletion.”*<sup>(13)</sup>

### **Summary conclusion**

It is my view that while various activities within the Reptilia framework present constant risks to animal welfare and public health and safety, the issue of onsite handling experiences and offsite MLAPs present particular risks that are almost certain to result in many incidences of animal suffering and human illness, as well as numerous events that will culminate in highly tragic circumstances. These risks should, and can, be avoided. Accordingly, I share the recommendations of others, that responsible authorities should act decisively with interventions to cease any expansion of relevant Reptilia programs, and further seek to limit activities within existing Reptilia operations to safeguard animal welfare and public health and safety.



Dr C Warwick .

1<sup>st</sup> November, 2021 .

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October 21, 2021

Dr. Esther Attard  
Director, Toronto Animal Services  
821 Progress Avenue,  
Toronto, Ontario M1H 2X4

Dear Dr. Attard,

It has recently been brought to our attention that Reptilia, a heavily commercialized private reptile zoo, is seeking an exception to the City of Toronto Municipal Code 349, Prohibited Animals exceptions list (the “Animal Control Bylaw”) in order to set up a private, commercial exotic zoo on the Toronto Harbourfront which would house and display a range of prohibited animals. Such a proposal raises a number of serious animal welfare and human health and safety concerns, and **we urge you to recommend that Reptilia’s request for an exception be denied.**

IFAW believes that wild animals belong in the wild and should not be kept as pets. We are in agreement with the concerns outlined by Zoocheck Inc. and other organizations in their formal request to you on this matter, dated October 13, 2021.

Given the significant public interest in previous deliberations on this issue, we are alarmed by the lack of public consultation on this exemption, particularly considering the potential to reverse or undermine Toronto’s commendable efforts to date on exotic animal issues, the potential damage to the city of Toronto’s reputation as a leader on progressive animal regulations, the increased demands on the city for oversight and monitoring of exotic animals, and the likely negative financial impacts on publicly funded institutions such as the Toronto Zoo.

We also recall the negative public health and safety impacts outlined in The City of Toronto’s approved staff report LS20.1 Prohibited Animals Review, May 31, 2017, particularly the increased risk of zoonotic disease transmission, the threats of which are well documented with reptiles. Given the heightened public awareness of viral transmission from animals to humans due to COVID-19, it seems rather inappropriate for the City of Toronto to be considering exceptions to the Prohibited Animals list that would facilitate the expansion of activities involving hands-on interactions with exotic animals.



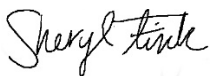
Reptilia is a private, commercial zoo business that profits from the display of wild animals in captivity, with ancillary activities including Mobile Live Animal Programs / “travelling zoos” that involve close interaction and handling of exotic animals (particularly aimed at children), as well as activities that encourage and promote the keeping of reptiles as pets, such as pet supplies and food sales, “rescue/adoption” and other services. Their business benefits financially if the number of reptiles kept as pets increases. We note that the three existing Toronto zoos do not sell exotic pet products, do not provide services that support the exotic pet trade and do not engage in an ongoing, broad range of offsite commercial activities that facilitate the popularization and normalization of keeping wild animals as pets.

The exotic pet trade – which is directly and indirectly supported by commercial enterprises such as Reptilia – is widely accepted as being a threat to wild animal populations, disruptive to natural ecosystems, a risk to native wildlife populations wherever non-native exotic pets are kept, and poses an infectious disease threat to human health and safety. In addition, there are significant animal welfare concerns with private ownership of reptiles, including lack of space, inability to ensure appropriate environmental conditions such as space, temperature, humidity and diet, and stress due to transportation and public handling and display.

Toronto has enjoyed a growing, positive reputation as a proactive, humane, animal friendly City that has taken progressive measures to protect the health and welfare of animals. The normalization, popularization, and expansion of keeping exotic animals as pets, or displaying them for profit, is not a desirable path from a public health or regulatory perspective.

For the reasons outlined above, and on behalf of IFAW Canada and our 86,000 supporters, I ask that City staff formally recommend against Reptilia’s request for exemption to Toronto’s Animal Control Bylaw.

Sincerely,



Sheryl Fink  
Director, Canadian Wildlife Campaigns  
IFAW

*The International Fund for Animal Welfare (IFAW) is a global non-profit helping animals and people thrive together. We are experts and everyday people, working across seas, oceans, and in more than 40 countries around the world. We rescue, rehabilitate, and release animals, and we restore and protect their natural habitats. The problems we’re up against are urgent and complicated. To solve them, we match fresh thinking with bold action. We partner with local communities, governments, non-governmental organizations, and businesses. Together, we pioneer new and innovative ways to help all species flourish.*

Dr. Esther Attard  
Director, Toronto Animal Services  
821 Progress Avenue,  
Toronto, Ontario M1H 2X4

October 27, 2021

Dear Dr. Attard,

I am writing to express the David Suzuki Foundation's concerns with respect to proposed exotic animal industries such as Reptilia, which, we understand, is currently seeking an exemption to the Prohibited Animal Bylaw in Toronto. We do not support this.

The exotic pet trade has been recognized as a serious threat to free-roaming wildlife populations and the integrity of natural ecosystems around the world. It also poses a risk to public health and safety. Our concerns about the exemption request are threefold:

1) The exotic pet trade may contribute to invasive species problems

According to their website, Reptilia promotes the notion that some reptiles make good pets.<sup>1</sup>

As you probably already know, a number of natural areas in Toronto have become populated with exotic pets that have been discarded by previous owners who weren't aware of the adult sizes their pets would reach or who weren't willing to commit to long-term provision of care over the course of their life spans. One study found that of turtles monitored in the wild in Ontario, 5-6% were non-native red-eared sliders released by pet owners (or were descendants of discarded pets).<sup>2</sup> Promoting the keeping of exotic pets has the potential to result in increased captive pet populations and a corresponding increase in the number of people who naively release them into the wild thinking they are being humane. Released

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<sup>1</sup> As per the Reptilia [website](#) which claims that characteristics of great reptile pets include having "relatively easy care requirements that are simple to provide for at home."

<sup>2</sup> [Turtle dumping: red-eared sliders are invading native turtle habitats in Ontario](#), Canadian Geographic, July 19, 2020.

species like red-eared sliders can outcompete native species and modify environments. The pervasiveness of invasive species is one of the primary drivers of wildlife decline in Canada.<sup>3</sup>

2) The exotic pet trade poses a disease risk to native wildlife and humans

Wildlife in Canada is already stressed by multiple infectious diseases transmitted by invasive species such as the fungus chytridiomycosis which is impacting salamander populations.<sup>4</sup> With increased numbers of exotic animals come increased chances of diseases being transferred to native wildlife species (especially if animals are released), as well as to humans (particularly if they physically contact the animals). The risk of new epidemics of animal origin is also increased,<sup>5</sup> a risk we don't want to exacerbate in Ontario or elsewhere.

3) The collection of wild animals impacts natural ecosystems

The collection of wild animals for commercial use, including for sale and keeping as pets, depletes wildlife populations, most of which are already facing a variety of threats to their populations and habitats,<sup>6</sup> and ruptures animal societies, which have varying degrees of social complexity.<sup>7</sup>

Thank you for taking the time to review our concerns.

Sincerely,



Rachel Plotkin, Wildlife Campaigner

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<sup>3</sup> [World Wildlife Fund Living Planet Report Canada, 2020.](#)

<sup>4</sup> [Salamander Chytridiomycosis](#), Canadian Wildlife Health Cooperative.

<sup>5</sup> [Vector-borne diseases](#), World Health Organization

<sup>6</sup> [Global Amphibian and Reptile Decline](#). Canadian Herpetological Society.

<sup>7</sup> "Capture is an act of severing, a sudden, explosive rupture, an abrupt, dramatic cleaving off of the animal from their socio-ecological reproductive networks: the kin and ecologies that support them and to which they contribute." Collard, Rosemary-Claire, *Animal Traffic: Lively Capital in the Global Exotic Pet Trade*. Duke University Press, 2020.

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