

ANIMAL  
ALLIANCE  
OF CANADA



TO: Chair and Members,  
Licensing and Standards Committee

FROM: Lia Laskaris, Manager  
Animal Alliance of Canada

Liz White, Leader  
Animal Alliance Environment Voters Party of Canada

Barry MacKay, Canadian Representative  
Born Free.

SUBJECT: LS27.2 – Feasibility of Licensing Wildlife Control  
Operators

DATE: March 18, 2014

Dear Chair and Members of Licensing and Standards Committee,

Thank you for your consideration in this matter and we urge you vote in favour of Toronto licensing wildlife control companies and we urge you to include a prohibition on the use of leghold traps, drowning snares and Conibear traps.

**No conflict between *the Fish and Wildlife Conservation Act* and a City licensing regime:**

The intent of the *Fish and Wildlife Conservation Act* is to allow property owners to address human/wildlife conflicts in a timely manner in a way that requires that it be done humanely for the animals involved and safely for members of the public and other animals, including pets.

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Toronto will not violate the Act by licensing wildlife control companies. Indeed, the intent is to ensure that property owners get the best possible service in a timely fashion and that public safety and humane concerns are addressed. The recommendation to ban certain traps addresses the public safety issues regarding the use of these devices in dense urban environments.

Although the City's report states that Section 31 requires anyone who harasses, captures, or kills wildlife to do so without unnecessary suffering, staff fail to describe how this section is enforced. We know

that this is not high on the Conservation Officers' enforcement agenda.

A review of OMNR Enforcement News for the last three years shows that Conservation Officer activities focused mostly on hunting and fishing violations. We were unable to find any enforcement actions regarding the illegal relocation of wildlife, or any regarding individuals who left animals in traps for longer than 24 hours. Absence of any enforcement evidence under this Section suggests that the OMNR dedicates little or no enforcement hours to these sorts of offences.

**The Ministry refuses to license wildlife control companies:**

We brought this issue to Toronto and other municipalities because, despite repeated requests, the Ontario Ministry of Natural Resources refuses to take responsibility for licensing these businesses in Ontario.

Two authors of this letter are members of the provincial Human/Wildlife Conflict Advisory Group. This group, who advises Ministry staff on how best to resolve human/wildlife conflict issues, made a unanimous recommendation for the Ministry to license these businesses. The Ministry rejected our recommendation.

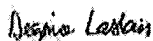
In addition, the sweeping amendments of Bill 55, the Strong Action for Ontario Act (*Budget Measures, 2012*) effectively enable "the outsourcing of many ministry decision-making powers to third parties at the discretion of the Minister of Natural Resources" (*Servicing the Public, Annual Report 2012/2013, Environmental Commissioner of Ontario, pg 47*).


Therefore the City needs to address this issue, given the Ministry's refusal to license these businesses. The Ministry has clearly demonstrated its intent not to get involved in human/wildlife conflicts in municipalities. It has been absent in resolving human/wildlife conflicts in municipalities of Toronto, Ottawa, Cornwall, London and Hamilton, to name a few.

**Conclusion:**

Therefore, we urge you to license wildlife control companies. City residents deserve to know who to contact to deliver a service that is effective, timely, humane and ensures public safety.

Sincerely,

  
Lia Laskaris

  
Barry MacKay

  
Liz White