

Letter from Zoocheck, Animal Alliance of Canada, Canadian Federation of Humane Societies, Born Free & Animal Justice re Council item LS15.2

December 12, 2016

Dear Mayor and Members of Council:

RE: Licensing and Standards Committee regarding Chapter 349, Animals, Exceptions for Prohibited Animals

We are writing to express our strong support for the Licensing and Standards Committee's recommendations (November 30, 2016) to update and modernize Toronto's exotic animal laws to better protect public health and safety and to enhance animal welfare. We support the recommendations for the following reasons:

- 1) They will facilitate the City of Toronto conducting its own due diligence for organizations and facilities who want to keep prohibited animals within City boundaries;
- 2) They will remove the old exemptions that gave zoo industry organizations and businesses free rein to operate in the City with no oversight, accountability and without convenient options for the City to take action, if required, to protect public health and safety or animal welfare.

We understand several businesses may have already asked for an exemption to the bylaw. We strongly oppose any additional exemptions, prior to the passage of the proposed by-law changes, for the following reasons:

- 1) Additional exemptions will undermine the intent of the Licensing and Standards Committee recommendations as the City of Toronto will not be able to conduct its own due diligence of these organizations and businesses who want to keep prohibited animals in the City. This is especially important when mobile animal shows, presentations and exhibits with wild or exotic animals are conducted in the City;
- 2) Additional exemptions may impact on public health and safety. Many animal shows and presentations promote contact between exotic animals and spectators, including young children and senior citizens. Public health agencies recommend that vulnerable members of society, such as young children, not come into direct contact with certain kinds of animals, such as reptiles and amphibians, or the surfaces they have touched due to the risk of disease transmission. There would be no legitimate mechanism for Toronto Animal Services to vet the practices of exempted organizations and businesses or to address any health threats associated with them;
- 3) Additional exemptions are unnecessary. The new system proposed by Toronto Animal Services will allow zoo industry member organizations and businesses an ability to apply for an exemption just like everyone else;
- 4) Additional exemptions would not allow the City of Toronto to adequately respond to the broad range of issues and concerns that are brought to its attention;

- 5) Additional exemptions would allow organizations and businesses to operate in the City with no accountability to City of Toronto residents;
- 6) Additional exemptions for organizations and businesses would allow them to expand the types of programs and the range of animal species, including dangerous animals, involved and Toronto Animal Services would have no ability to intervene;
- 7) Additional exemptions should only be considered for organizations and businesses with a physical location in the City and only after passage of the proposed changes. All mobile exotic animal show, presentation and exhibit organizations and businesses, regardless of location, should be required to apply under the proposed new Toronto Animal Services system so they can be properly vetted.
- 8) None of the currently exempted facilities (e.g., Toronto Zoo, High Park Zoo) or Ripley's Aquarium of Canada conduct off-site shows and presentations as a significant facet of their operations;
- 9) Any services that organizations and businesses claim they provide to the City of Toronto can still be delivered without an exemption, while other activities may be allowed once they apply for and receive an exemption under the new system;
- 10) Organizations and businesses should not qualify for an exemption just because it supports their business interests. Doing so would set a precedent that would allow other similar businesses to make the same argument.

We urge you to vote in favour of the Licensing and Standards Committee's recommendations to update and modernize Toronto's exotic animal laws in the interest of public health and safety and animal welfare.

Sincerely,

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