

Accredited Members

British Columbia

British Columbia
Wildlife Park
Greater Vancouver
Zoo
Vancouver Aquarium
Marine Science Centre

Yukon

Yukon Wildlife
Preserve

Alberta

Calgary Zoo, Botanical
Garden & Prehistoric
Park
Marine Life
Department, West
Edmonton Mall
Edmonton Valley Zoo
& John Janzen Nature
Centre

Saskatchewan

Saskatoon Forestry
Farm Park and Zoo

Manitoba

Assiniboine Park Zoo

Ontario

African Lion Safari
Bird Kingdom
Bowmanville
Zoological Park
Cochrane Polar Bear
Habitat
Jungle Cat World Inc.
Little Ray's Reptile
Zoo, Ottawa &
Hamilton
Marine Land of
Canada
Reptilia Zoo
Ripley's Aquarium of
Canada
Riverview Park and
Zoo
Safari Niagara
Toronto Zoo

Québec

Aquarium du Québec
Biodôme de Montréal
Ecomuseum Zoo
Parc Safari (2002) Inc.
Société Zoologique de
Granby Inc.
Zoo Sauvage de St.
Félicien

New Brunswick

Cherry Brook Zoo Inc.
Magnetic Hill Zoo

LS15.2.7



November 29, 2016

Members of the Licensing and Standards Committee Agenda item #LS15.2

We are writing regarding the proposed amendments to Chapter 349 of the Toronto Municipal Code.

Absent a detailed implementation plan spelling out administrative and policy issues related to the treatment of prohibited animals within the territory of the City of Toronto, the proposal raises a number of issues which are exacerbated by the absence of a provincial legislative or regulatory framework governing the keeping or exhibition of exotic animals.

Indeed, Ontario is the only jurisdiction in Canada lacking any form of legislation directly limiting the ownership of exotic animals in the province. While section 112.4 of the Fish and Wildlife Conservation Act gives the minister the power to create regulations in this regard, none have been made. As such, the province relies on municipal bylaws to regulate the ownership and exhibition of exotic animals.

The proposed elimination of the exemptions related to facilities accredited by Canada's Accredited Zoos and Aquariums (CAZA) will result in an unnecessary legal void and administrative and enforcement burden on the City of Toronto.

Moreover, the elimination of the accreditation requirement for exotic animal exhibits and educational outreach programming creates unnecessary animal welfare and public safety risks. On this point, we are concerned with respect to the qualifications of City staff to make authoritative determinations in relation to animal welfare (which from an operational perspective includes everything from standards of veterinary care, to diet, to enrichment, to exhibit design, etc.), public and employee safety (including public health concerns) as well as the quality of the administrative and other policies and procedures which should inform the day-to-day operations of a modern zoological facility or animal ambassador program.

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In 2009 the province of British Columbia adopted the most stringent rules governing the keeping and exhibiting of exotic animals in the country following the tragic death of a young woman at a roadside zoo.

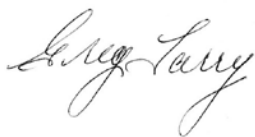
British Columbia today requires zoos and aquariums that possess or want to possess Controlled Alien Species (non-native alien species deemed a risk to human health and safety, property, wildlife or wildlife habitat) to be accredited through CAZA or an equivalent accreditation agency, such as the American Association of Zoos and Aquariums (AZA), or provide proof to the satisfaction of the appropriate Department of meeting or exceeding the accreditation standards set by CAZA.

In 2009, the government adopted a list of prohibited and restricted Controlled Alien Species and introduced the CAS Regulation. The CAS Regulation prohibits possession, breeding, shipping or transporting of a prohibited CAS unless a permit has been granted by the Director of Wildlife. These permits can only be issued to individuals if the prohibited species was in British Columbia prior to March 16, 2009 or if the Director is satisfied that special circumstances exist. The CAS Regulation also prohibits the release or escape of a prohibited or restricted species under any circumstances.

We are of the opinion that the BC model which is built on a foundation of internationally recognized standards while at the same time providing the government with administrative discretion can and should inform the City of Toronto's own prohibited animal licensing system.

In summary, while we are ready to work with City of Toronto staff to address the licensing issues raised in the proposal, we find 1) the proposed amendment absent any detailed implementation plan to be premature, and to represent an unnecessary risk to public health and safety as well as to animal welfare; and 2) that the BC system represent a model that should be reviewed by staff and considered by this Committee.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Greg Tarry".

Greg Tarry
Acting Executive Director