



June 22, 2017

Mayor Tory and Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: LS20.1 - Prohibited Animal Review - City of Toronto - Licensing and Standards Committee

On behalf of Humane Society International/Canada, thank you for the opportunity to comment on the Prohibited Animal Review.

Humane Society International/Canada is a leading force for animal protection, representing tens of thousands of members and constituents across the country. We are an effective voice for animals, with active programs in companion animals, wildlife and habitat protection, marine mammal preservation and farm animal welfare. HSI/Canada works to protect all animals through education, investigation, litigation, legislation, advocacy, and field work.

Mobile Live Animal Programs (MLAPS)

The report dated May 31, 2017 includes two concerns raised by MLAP business stakeholders about the removal of the educational exemption from Municipal Code, Chapter 349, Animals: profit loss caused by the timing of the original enforcement date and the foregone educational value of prohibited animals in MLAP programming.

While MLAP businesses may operate with the use of non-prohibited animals throughout the proposed extension period, their use of said animals in their programming would continue to pose the threats to animal welfare, public health and safety, and the environment outlined in the report. Furthermore, with respect to any request for exemption on the basis of educational value, HSI/Canada would like to underline that there is no substantive body of empirical evidence supporting the claim that MLAPs are educationally beneficial or that they produce measurable educational outcomes.

We therefore recommend that the City of Toronto reaffirm the December 2016 Toronto City Council decision to delete the educational exemption from the existing by-law as of July 1, 2017 and that it deny educational exemption to all MLAP businesses.

Prohibited Animal List

The only rationale submitted by staff in the report for the maintenance of a prohibited animals list is that prohibited lists have been implemented in some of the jurisdictions included in their survey. The report, however, does not provide any details about the staff's survey methodology; cite any empirical evidence in support of prohibited lists; investigate any other option (i.e. positive or permitted lists); or report on the effectiveness of prohibited lists in the referenced jurisdictions.

We therefore recommend that the City investigate, consider and report back on the merits of positive lists.

We encourage the City of Toronto to be guided on this issue by what is in the best interest of all the animals involved. Thank you again for your time and we look forward to the next steps.

Sincerely,

Rebecca Aldworth
Executive Director
Humane Society International/Canada