

June 28, 2017

Mayor John Tory and Toronto City Councillors  
Toronto City Hall  
100 Queen Street West  
2nd floor  
Toronto, ON M5H 2N2

Dear Mayor Tory and Toronto City Councillors:

I would like to congratulate Toronto City Council on your continued efforts to create a legislative environment that promotes the care and welfare of animals while recognizing the interests of Toronto residents.

I understand a recommendation to amend the list of prohibited animals will be considered by Council on July 4<sup>th</sup> by adding three avian orders, Gruiformes (cranes, rails), Phoenicopteriformes (flamingos), and Sphenisciformes (penguins) to the prohibited list. The prohibited list already includes of Galliformes, Anseriformes and Struthioniformes. The background information explains that the keeping of these birds as companion animals is unlikely. I agree, it is unlikely that species belonging to these orders would be kept as companion animals or pets. It is not as pets or companion animals that people keep these species. Other than Sphenisciformes that have quite specialized management requirements and are not being kept, there are many species included in Gruiformes, Phoenicopteriformes, Galliformes, Anseriformes and Struthioniformes being well managed and bred by private aviculturists in Ontario. The involvement of private aviculturists in captive bird management needs to be recognized in addition to those keeping birds as pets and companion animals. I have had the privilege of working with many species in all six of these orders. Most species can be well managed in captivity and in accordance with the six new criteria created to manage the prohibited animals' list.

Aviculture is the practice of keeping birds in captivity using controlled conditions, for hobby, business, research & conservation purposes. Aviculture ranges from breeding domesticated species such as canaries & budgerigars to conservation breeding programmes for rare species. Although aviculture is a hobby for many people, technological developments over the last few decades has advanced aviculture to a science.

Private aviculturists derive great satisfaction from breeding birds in captivity and for some species this can serve to aid in the establishment of sustainable captive populations of rare or endangered species. This is especially true of some species of pheasants and parrots that are very

rare in the wild. Through captive breeding they have been saved from extinction. A species example currently in the news is Edwards' Pheasant (*Lophura edwardsi*), being bred by private aviculturists here in Ontario. Through conservation aviculture a sustainable population of this very rare species has been established and some specimens have recently been returned to Vietnam with the prospect of a future re-introduction into the wild. Zoos including the Metro Toronto Zoo, work with private aviculturists, who assist them in breeding rare or difficult to breed species.

I suggest that the use of an avian order is too broad a category for the development of a prohibited list. I recommend only using the taxon of order for a prohibited list when the entire group is unsuitable for keeping in captivity by private individuals. Although there may be a desire to ban domestic chickens, placing the order Galliformes on a prohibited list bans many other species for which the requirements could easily be met, even within the confines of a city. Among groups of birds that do not meet the criteria regarding a prohibited list, I further suggest they be identified more precisely by the appropriate taxon, i.e. species, genus, or family.

The Avicultural Advancement Council of Canada (AACC) is affiliated with many avicultural organizations and private aviculturists. The AACC and its affiliates can assist Toronto Animal Services in developing programmes and adjusting prohibited lists in the best interests of bird species.

Sincerely,



J. Paul Stevens, Ph.D.  
Legislation Committee Chair,  
Avicultural Advancement Council of Canada

