



Attn: Toronto City Council,

June 13, 2017

For your consideration with regards to Toronto Animal By-law new proposed order of birds to include to prohibited list:

My name is David T. Longo. I was born and raised in Toronto and am director of Zoo Trade International and president of Longo's Aviaries. My companies are responsible for humane relocation of animals in approximately 50 countries. In addition, to provide typically difficult to reproduce captive bred specimens and avian companions to the Canadian pet and avicultural community. I have an education in ornithology, herpetology and zoology from the University of Guelph. I have several captive breeding awards and honourable publications in peer reviewed journals in more than 5 countries. I have an advanced understanding of the scientific background and economics of animals addressed today in all these said markets.

I am providing input from a practicing professional private aviculturist the past 35 years in the field. I will be referencing the most recent inclusion of *Gruiformes* (cranes, rails), *Phoenicopteriformes* (flamingos), and *Sphenisciformes* (penguins) to add to the prohibited list by following the criteria created by the Licensing and Standards Committee as to whether an animal should be added or removed from the prohibited animals list and to help evaluate if certain animals should be added or deleted from the list:

(This list of criteria was extracted from Toronto Licensing and Standards Committee website)

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.LS20.1>

- a. *determining if animal is on federal or provincial protected, at-risk, endangered or prohibited list;*
- b. *determining if animal is venomous or poisonous;*
- c. *determining if animal will present an undue danger to human health or safety;*
- d. *determining if animal care and welfare needs can be reasonably met by owner;*
- e. *determining if animal presents an invasive to local animals or the environment;*

I am presuming clause 'e' there is a grammatical error of which the word 'threat' should be placed after the word 'invasive'

f. determining if animal will cause public nuisance problems (such as noise, odour or significant garbage/waste); and

g. determining if there is substantial independent, impartial, scientific, peer-reviewed evidence showing that the animal is relatively easy and inexpensive to keep and capable of being housed and cared for with respect to its fundamental biological, behavioural, ecological and welfare needs. Each animal's nutritional, thermal, lighting and other environment needs and landscape, furnishing, shelter and privacy requirements must be known and can be comprehensively, inexpensively and easily met.

The 3 orders of birds to be potentially included in the prohibited list:

- are not provincially or federally protected or controlled, at risk or endangered.
 - are not venomous or poisonous
 - do not pose any danger to human health or safety
 - animal care and needs can be reasonably met by any owner with a vested interest in these birds.
 - does not present an invasive threat to local animals or the environment
 - none of these families of birds create any more waste than an average sized dog/cat nor can they be a public nuisance.
- 1) *Gruiformes* (cranes, rails) – no cranes or rails are currently or have ever been held by anyone in Toronto. Gruiformes cannot survive Toronto winters and are prey species so cannot thrive if accidentally released.
 - 2) *Phoenicopteriformes* (flamingos) minimal care required, general knowledge of caregiving, no nuisance to humans or a threat to the environment. The potential of a Toronto resident to have flamingoes is highly unlikely. They cannot survive Toronto winters, cannot find food sources they are naturally designed for and are prey species so will not thrive if accidentally escaped.
 - 3) *Sphenisciformes* (penguins) – no penguins exist in Canada in private hands therefore this would be an order added unnecessarily as the *Kiwis/Struthioniformes* currently on prohibited list. Most *Sphenisciformes* may survive Toronto winters but there are no food sources for them to thrive. Penguins do not exist in Canada aside from a few municipal zoological institutions.

These 3 orders of birds are all naturally acclimated to water on different levels so this is the primary area of concentration when designing enclosures. I have had a group of 6-10 flamingoes under my direct care (not one day missed) for the past 5 years and counting. I have cared for additional flocks of 25+ I have kept them in minimum sized enclosures ranging from 32 sq ft - 128 sq ft. Costs for food and bedding are approximately \$50.00/month. Minimum temperatures are 5-10° Celsius during winter months with small pools in the enclosures to ensure their feet are wet whenever they require. I have also kept and raised 3 species of cranes under my care with the same standards and care. It is of my professional opinion that they are easier to care for and require far less maintenance albeit a better understanding and interest than several families of commonly kept avian companions.

Further strong recommendations:

The following birds currently on prohibited list should be removed:

- 1) *Galliformes* (pheasants, grouse) are considered non-commercial or not farmed for food production as turkeys, chickens, guineafowl and quail hence extremely low risk of disease submission and of avicultural importance and more importantly in compliance with all the criteria listed above.
- 2) *Anseriformes* (ducks, geese, swans) there are many waterfowl which can be kept in smaller sized enclosures and require smaller sized pools and comply with all the criteria above. Of course this would exclude any species native to Ontario (unless licensed) which is governed by the M.N.R.
- 3) *Struthioniformes* (flightless ratites / kiwis) – no kiwis exist outside of New Zealand with the exception of a small handful of zoological institutions in Germany and U.S.A. under the supervision of New Zealand Department of Conservation . The chance of this genus of *Struthioniformes* to enter any private hands in Canada is a near impossibility.

An idea to put things into perspective, a common budgerigar is kept by literally hundreds of thousands of citizens across Canada. Budgerigars and other orders from avian taxa can potentially carry zoonotic diseases. To date, there have been no incidents of reportable zoonotic diseases from avian specimens to humans in Canada. Flamingoes and Cranes pose no threat or danger to humans any more than a budgie. All birds imported into Canada are controlled with close scrutiny by the federal government / Canadian Food Inspection Agency (C.F.I.A) so the likelihood of avicultural birds getting disease aside from *Chlamydia psittaci* are near non-existent. If any birds can possibly threaten humans with zoonotic diseases as *Salmonella*, it is common poultry when cooked improperly.

Note; there are literally tens of thousands of pet bird companion owners across the GTA, they are the third most popular pet next to dogs and cats according to the Pet Industry Joint Advisory Council (PIJAC).

We are already self governed by the Model Avicultural Program (M.A.P.) currently monitored by the Avicultural Advancement Council (AACC) of which have higher standards of care than C.A.Z.A.

If there are any concerns, please do not hesitate to contact me.

Regards,

Mr. D.T. Longo

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