

To: Mohamed Shuriye <[Mohamed.Shuriye@toronto.ca](mailto:Mohamed.Shuriye@toronto.ca)>

CC: Elizabeth.Glibbery@toronto.ca , Jeremy Faria

Dear Mr. Shuriye:

I would like to express my appreciation to you and Toronto Animal Services for your continued efforts to promote the care and welfare of animals.

I read with interest the recommendation to add three additional orders to the prohibited bird list that already includes of Galliformes, Anseriformes and Struthioniformes. The explanation notes that the keeping of Gruiformes (cranes, rails), Phoenicopteriformes (flamingos), and Shenisciformes (penguins) 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 Shenisciformes that have quite specialized management requirements, 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. Both flamingos and cranes; can be well cared for by private individuals; however, in a city it may be difficult to provide adequate space to meet their housing requirements.

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.

Private aviculturists are playing a very significant role in conservation aviculture and have often done more than zoos to establish sustainable populations of some species in captivity. Since the 1960's the emphasis on keeping birds in captivity has transitioned from wild-caught birds to aviary bred birds. Among private aviculturists there is tremendous expertise on different bird groups. 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. 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. There are a number of gallinaceous species for which there is a need of more people to participate in conservation breeding programmes to establish more genetically diverse and sustainable captive populations.

Private aviculturists need to be in partnership with Toronto Animal Services to ensure that the many species being kept in captivity receive proper care. 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, 

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Legislation Committee Chair,  
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Population management is the crux of conservation, and is actually an easier strategy for private individuals to adopt than some zoos or conservatories. As a result, most of the largest and genetically most representative populations of parrots are today found in private collections.

The families with disproportionate numbers of species for which conservation breeding is recommended for consideration here tend to be those that breed more easily in captivity and that are highly threatened by either capture for the bird trade (e.g. parrots) or hunting for food (e.g. pheasants and waterbirds).

The reasons for keeping a particular species will affect its needs for care. Determining if animal care and welfare needs can be reasonably met by owner;

Birds possessed by private aviculturists are kept in facilities with good biosecurity and are general not used for public events.

“The report includes a recommendation to develop a public education campaign that Municipal Licensing and Standards (ML&S) will create with relevant City divisions, agencies, boards, and external stakeholders to strengthen public awareness of animals permitted to be used and best practices for public health and safety and animal welfare and care.” Avicultural organizations could help. There is tremendous expertise among private aviculturists.

As you have described in the review, there is considerable variation from one jurisdiction to another regarding the species that are prohibited. Chickens.

Often organizations such as OSPCA lack the knowledge and expertise on the care of many species kept in captivity. Avicultural organizations can provide advice on the requirements of different species.

Report lists purposes for prohibited animals should be allowed – school visits, animal assisted therapy etc. Breeding should also be included.

87% identified animal care and welfare needs can be reasonably met,

The concept of a prohibited list instead of a positive list is inappropriate. It would result in the banning of species that should not be prohibited.

Determine if animal care and welfare needs can be reasonably met by owner

An analysis for adding or removing an animal to the list will include consideration of the animals' welfare. This would include evaluating if the needs of the animal for veterinary services, easy access of suitable food, adequate shelter and environment can be reasonably met by owner.

- Maintaining chickens on the prohibited animals list

Staff do not recommend removing chickens from the prohibited animal list. Currently Chapter 349 prohibits all domesticated birds of the species Galliformes (chickens and other birds such as pheasants, grouse, guinea fowls and turkeys). In reviewing the restriction on chickens, three major criteria remain problematic: ensuring public health and safety, ensuring keeping of hens will not cause public nuisance problems, and animal care and welfare needs can be reasonably met.

Research indicates that the primary human health risk of keeping chickens is infectious disease transmission, such as Salmonella. Avian influenza, or bird flu, is another potential concern although this is currently not considered by animal health or public health experts to be a significant risk in chickens. Another important consideration is the potential public nuisance problems that might arise from the keeping of chickens. Some of these concerns arise from noise and odour. Lastly,

keeping of chickens outdoors in poor enclosures and coops may present animal care, welfare risks for chickens and attract pests such as flies, mice, rats, skunks and raccoons, and coyotes. After reviewing these risk factors, staff do not recommend removing chickens from the prohibited animals list.

Ministry of Health and Long-Term Care and Toronto Public Health has identified some animals that may present a higher risk of disease transmission or more prone to aggressive behaviour and should not be invited to child care centres or be exposed to at risk population groups. live poultry (chicks, ducklings, and goslings), ferrets, and farm animals (calves, goats and sheep).

# *Zoo Trade International*

*Niagara Falls, Ontario, Canada*



Attn: Mohamed Shuriye, Toronto City Council,

June 13, 2017

For your consideration with regards to Toronto Animal By-law new aves class re-introduction:

First I must apologize for being unable to attend today's meeting. Our family is currently short a vehicle hence made my trip to Toronto near impossible to come to fruition on short notice. I am granting Mr. J. Faria permission to represent my letter of support today (June 14, 2017) towards Toronto City Council.

My name is David Longo. I was born and raised in Toronto and am director of Zoo Trade International and president of Longo's Aviaries Inc. My companies are responsible for humane relocation of animals in approximately 50 countries around the globe and providing captive breeding of specimens typically difficult to reproduce in captivity and avian companions to the Canadian pet and avicultural industry. 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.

The three main purposes I will address today are:

- 1) Exotic Animal By-law revisions from 2002 introduction
- 2) Hands On Exotics
- 3) Legalities and husbandry of the said groups of birds addressed today

1) BIRDS currently listed on prohibited list:

Anseriformes (such as ducks, geese, swans, screamers)

Galliformes (such as pheasants, grouse, guinea fowls, turkeys)

Struthioniformes (flightless ratites such as ostriches, rheas, cassowaries, emus, kiwis)

My strong recommendations:

- 'Pheasants' should be removed from the Prohibited list as they are commonly kept by birdkeepers outside the GTA all across Canada. They do not pose any health risk to humans and are not considered commercial as other galliformes listed.
- 'Kiwis' be removed from the Prohibited list, there are no kiwis existing outside of New Zealand institutions as the New Zealand Government has them under strict protection. I do not know how they were even nominated onto this list in the beginning.
- Flamingoes, Cranes, Penguins should not be recommended to add to this list.

2) The travelling zoo (*Hands on Exotics*) in question today operating in Toronto have attained the CAZA accreditation which is one of two things;

- highly coveted and not easily attainable
  - One of the conditions of Toronto's by law to keep exotics under Chapter 349, Schedule A so there should be no concern of the animals that fall under this clause.
- 1) If there are issues that concern the health of the public when being exposed to these animals, fortunately CAZA accredited institutions are aware first and foremost of the animals that pose risk or threat of zoonotic diseases to humans, such as primates and certain families of the class aves. This should alleviate any or all concerns to the Municipality of Toronto as CAZA accredited institutions/operations all follow strict criteria as testing animals, sterilizing hands and touch tables to ensure the safety of humans is a priority when practicing outreach and educational shows.
  - 2) My company has leased birds which no public or private institution in Canada has to Mr. Falk for months at a time. These birds are of extremely high value and I would never consider such a transaction if I was the slightest concerned for the welfare of my animals. I knew he had his CAZA accreditation, I know he was in proper zoning for his operation, I have inspected his facilities and he has the manpower and keen eye to care for these animals.

Because one travelling zoo happens to have one flamingo in their possession being both properly and I **STRESS** legally cared for does not give grounds for the city to propose them to be recommended on the prohibited list. Yes, it may be odd to encounter a bird you would normally see in a zoo setting in a different environment but does not grant anyone without knowledge of this birds' needs to offer their opinion and allow the city to take one complaint to this level on this day. Today's forum all stems from one person with no scientific knowledge and an anthropomorphic view of the birds' needs and what one person perceives is not an adequate environment for a flamingo should not give any person's opinion any validation. In order for an opinion to be valued in this field, it should come from a source with experienced knowledge and scientific verification for the husbandry of these animals that are being cared for with high standards and monitored by our existing self-governing bodies.

An example of this:

### **Flamingo Husbandry Guidelines**

*A Joint Effort of the AZA and EAZA along with WWT by Catherine King, EAZA Ciconiiformes/Phoenicopteriformes EEP .*

*Published in the **International Symposium on Breeding Birds In Captivity (I.S.B.B.C.) Proceedings** held in Toronto September 2007 by my partner M. Lamont and myself D.T. Longo welcomed with a preface welcome introduction by our Mayor John Tory.*

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#### **Water Source**

*"Flamingo pools can be a natural stream/lake or a man-made pool. The pool should allow the birds to easily access the water. There are several different types of man-made pools that can be utilized, such as dump and fill. The dump and fill pool is probably the most common and is less expensive to install than recirculating/skimming pools. Dump and fill pools require weekly cleaning and can be a disruption factor with breeding birds."*

One incident of a flamingo being held by a legal business operating under all legal definitions does not offer any grounds for class Phoenicopteridae (Flamingoes), Grus (Cranes) and Sphenisciformes (Penguins) to be added to the prohibition list when this was already reviewed and excluded in 2002 because there was simply little to no possible 'negative' incidents that would foreseeably be reported and to this date, still has not been in Toronto in 15 years. The reason being is there have never been any penguins available anywhere in Canada on the private market, only zoological institutions hold these birds. Flamingoes and cranes may be held by a finite small percentage of the population of bird keepers as a whole in Canada and none have surfaced in private hands without CAZA Accreditation in the Municipality of Toronto since the by-law has been introduced in 2002.

Flamingoes and Cranes pose no threat or danger to humans any more than a budgie does and there are literally hundreds of thousands of budgerigar pet owners across Canada.

I have had a group of flamingoes under my direct care every day for the past 5 years and counting, also have raised several cranes from young in this same time period. It is of my professional opinion that they are easier to care for and require far less maintenance than several families of parrots do. Note; there are literally tens of thousands of parrot 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).

As this has already been mulled over in 2002's by-law introduction, we are already self governed by C.A.Z.A. and the Model Avicultural Program (M.A.P.) currently issued by the AACC. We welcome input from the city council as we are to date doing an outstanding job governing the keepers of any or all exotic birds and mammals with these two governing bodies.

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

Regards,

D.T. Longo

A handwritten signature in black ink, appearing to read "D.T. Longo". The signature is written in a cursive style with a large, prominent "D" and "L".

Zoo Trade International – Manager

Longo's Aviaries – Director

Phone: (647) 453-AVES