

June 13, 2017

Members of the Licensing and Standards Committee:
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Licensing and Standards Committee:

On behalf of Canada's Accredited Zoos and Aquariums (CAZA), I would like to take this opportunity to provide you with some more information about our organization, and respond to the recommendations put forth by staff regarding changes to the City of Toronto bylaws regarding the use of prohibited animals in educational programming.

CAZA is a private not-for-profit organization which for the last 40 years has represented the leading zoological parks and aquariums across Canada and created some of the strongest standards for animal welfare in the world. At our core, the accreditation system supports the continuing evolution of Canadian zoos and aquariums as ethical agencies of learning and engagement, conservation, and science – and rejects the notion that zoos and aquariums should simply be exhibitors of animals.

CAZA-member institutions connect over 12 million visitors to nature every year. By helping people establish connections with animals, CAZA members are inspiring visitors to make changes in their daily lives that protect biodiversity and environmental sustainability.

The core focus of CAZA's accreditation program is animal welfare. It is incorporated into every element of CAZA's independent inspections. From access to quality veterinary care, operations, conservation, educational programming, animal husbandry and enrichment – animal welfare is our primary focus.

CAZA is committed to annually reviewing our accreditation process to ensure that it is transparent and independent. CAZA accreditation inspections are performed by an independent licensed veterinarian, husbandry expert, and operational expert. As of this year, CAZA requires a licensed veterinarian from the Canadian Veterinarian Medical Association (CVMA) to sit on CAZA's Accreditation Commission. Part of that role is to critically challenge what is found during inspections, review and modernize the accreditation process, and make decisions on which facilities will receive the gold standard of CAZA accreditation.

This year, CAZA is embarking on a new challenge to receive accreditation from the Standards Council of Canada. This process will bring even further transparency to our organization through

the creation of independent committees and stakeholder input in the creation of new standards and policies.

CAZA accreditation is increasingly recognized as the benchmark for quality animal care and welfare in Canada with more and more governments at all levels incorporating CAZA standards in their animal welfare and management policies. For example, British Columbia requires CAZA accreditation to display prohibited animals, and New Brunswick, has commissioned a government task-force recommending CAZA accreditation as a requirement for licensing. In Ontario, CAZA enjoys a positive working relationship with the OSPCA which includes training and information sharing on issues of mutual concern. CAZA also participated in a panel that looked at the question of using contact animals in licensed day-cares. [The government issued document recommends](#) selecting CAZA accredited facilities due to the strength of our measures to protect the public interacting with the animals in our care.

Regarding the review of the prohibited animal bylaws, CAZA commends the City of Toronto for leading the way on an issue where there has been little regulation, and very minimal enforcement. However, prohibition will not effectively stop the use of prohibited animals in mobile programming as the City of Toronto intends. Rather, it will drive an already existing subversive market for prohibited animals further underground. The best chance that the City has at regulating this issue is to work with CAZA and insist that organizations that conduct programming with prohibited animals are at minimum doing so with CAZA accreditation.

The reality is it is not illegal to own an exotic animal in Ontario and there are a number of individuals operating outside the City of Toronto who bring prohibited animals into the City for events such as children's birthday parties. They are not respecting current regulations on prohibited animals, and will likely continue to disregard future changes. With CAZA facilities being some of the few who will respect the proposed changes, the demand for prohibited animals will create a void which the underground market will fill. By driving the issue further underground, the City of Toronto will not have the proper resources in place to monitor and enforce regulations effectively. Ultimately this oversight will be at the expense of public safety and the animal's welfare. A public awareness campaign as proposed is not enough to mitigate the seriousness of the risks involved.

The City should not wait for a crisis to happen before looking at the serious implications of these changes. We urge the City to work with CAZA so there is an authorized program and legal options for educators in Toronto to work with credible, respected, and insured accredited organizations.

CAZA is eager to work with City Council, and expects to be held accountable for the actions of our members. In the last year we have taken a hard look at ourselves as an organization and are making important changes necessary to modernize our operations. We have lost members as a result.

Last year, CAZA undertook a significant review of our *Use of Animals in Educational Programming* policy and implemented a substantial number of changes to more effectively protect the welfare of the animals in the care of our members, and the safety of the public interacting with them. These changes included a review of our health and safety protocols, staff training, and principles for conducting animal programming. CAZA is in the process of taking an even stronger approach to this policy and would welcome input from City Council on what you believe is important.

Last year CAZA also implemented a *Coming into Force of CAZA Rulemaking Policy* which requires all CAZA policies, standards and directives to come into force 30 days following their adoption. It also requires Chief Executive Officers to sign a letter of attestation each year declaring that their facility is compliant with all CAZA policies. Those found not in compliance and who do not receive a variance are subject to possible ethics charges and progressive discipline.

Ethical concerns regarding CAZA members are taken extremely seriously and handled efficiently through CAZA's established ethics and progressive discipline measures. Every complaint is reviewed and documented. As demonstrated in the recent changes to CAZA's membership, ethics and compliance issues are thoroughly investigated and discipline is enforced.

Blanket changes to the bylaws alone will not stop the systemic problem involving the illegal use of prohibited animals in the City of Toronto. By working with CAZA, the City can bring a stronger level of scrutiny and enforcement which current resources do not allow.

Thank you for the opportunity to contribute to your study. Please do not hesitate to contact me directly at sshafer@caza.ca or 613-627-3779 x 221 if you have any questions regarding this information or CAZA's standards pertaining to the use of animals in offsite educational programming.

Sincerely,

A handwritten signature in blue ink that reads "Susan Shafer". The signature is written in a cursive style and is positioned to the left of a vertical line.

Dr. Susan Shafer
Executive Director, Canada's Accredited Zoos and Aquariums

ANNEX 1: CAZA's Policy of the Use of Animals in Educational Programming

CAZA Policy On The Use Of Animals In Educational Programming

Position Statement on the Use of Animals in Educational Programming

CAZA supports the appropriate use of program or contact animals as an important and powerful educational tool in enhancing cognitive and affective messages about conservation, wildlife and animal welfare.

Utilizing these animals allows educators to engage audiences more effectively. Numerous studies have shown that the use of animals in educational programming results in increased knowledge acquisition and retention; enhanced ecological awareness, and the development of positive perceptions concerning animals.¹

Zoos and aquariums are ideal venues for creating emotional ties to wildlife and fostering an appreciation for the natural world. However, developing and delivering effective educational programming in the free-choice learning environments of zoos and aquariums is a difficult task.

Zoos and aquariums utilize a number of pedagogical strategies to achieve this goal. The use of program animals is one such strategy and can provide the compelling experience necessary to attract and maintain personal connections with visitors of all motivations, thus preparing them for learning and reflection on their own relationships with nature.

But for these animal-centric education strategies to work, the lessons they convey and their underlying messages about nature and about the animals themselves must be true. To do otherwise would be to sow confusion and, potentially, engender cynicism about nature rather than the respect that must be at the core of every educational activity undertaken in zoological institutions.

¹ A recent study is the 2014 *A Global Evaluation of Biodiversity Literacy in Zoo and Aquarium Visitors*, World Association of Zoos and Aquariums (WAZA). This report analyses and summarises the most comprehensive zoo and aquarium visitor biodiversity- awareness survey ever undertaken. The study's main finding is that both biodiversity understanding and knowledge of actions to help protect biodiversity in survey respondents significantly increased during visits to a zoo or aquarium.

Notwithstanding the powerful contributions that program animals can make in connecting people to nature and changing attitudes and values, the welfare of the animals in our care and the integrity of the educational and conservation mission of accredited institutions remain CAZA's principal concern.

Accordingly, this document is designed to inform the practices of CAZA members when using the animals in their care in public program or contact activities. Moreover, accredited institutions must ensure that all of CAZA's relevant policies (animal welfare, education, transportation, etc.) are strictly adhered to when using program animals.

Animal Welfare

CAZA defines Animal Welfare as an animal's physical, mental, and emotional states over a period of time, and is measured on a continuum from good to poor.

An animal typically experiences good welfare when healthy, comfortable, well nourished, safe, able to develop and express species-typical relationships, behaviors, and cognitive abilities, and not suffering from unpleasant states such as pain, fear, or distress. Because physical, mental, and emotional states may be dependent on one another and can vary from day to day, it is important to consider these states in combination with one another over time to provide an assessment of an animal's overall welfare status.

GUIDING PRINCIPLES

CAZA believes that the use of animals in zoo and aquarium Educational programming is acceptable only if the programming contributes to one or more of the following:

1. Understanding of fundamental biological and ecological principles;
2. Development of knowledge that can reasonably be expected to encourage species and habitat conservation;
3. Understanding of ecological principles and issues of environmental sustainability with the goal of changing human behaviour;
4. Positive therapeutic outcomes, as in Animal-Assisted Therapy (AAT), a type of interaction that involves human-animal interaction as a form of treatment.²

² The goal of AAT is to improve a patient's social, emotional, or cognitive functioning by creating or expanding the positive impact of human and animal encounters

When using animals in public programming, CAZA members must strive at all times to treat these animals with dignity and respect, and in a manner that showcases and highlights animal behaviours that are demonstrations of their natural intellectual or problem solving ability and their physical attributes. CAZA members must also at all times ensure that the program activity is conducted in a place and a manner that is safe for the animal, the handler and visitors. Practices that should be avoided when using animals in public programming include:

1. Any practices that provide audiences with a misleading impression of the natural behaviours of wild animals, or directly or indirectly make claims about wild animal behaviour that are not substantiated by scientific evidence.
2. Any practice that provides audiences with misleading impression about the safety and appropriateness of handling animals
3. The use of props where their use cannot be shown to demonstrate or replicate natural behaviour.
4. Any behaviour that when implemented poses a demonstrable or probable animal welfare risk.
5. Any behaviour or practice that poses a demonstrable or probable risk to the safety of the handlers(s) or visitor(s)

CAZA recognizes four main categories of appropriate educational programming involving an institution's animals. With the exception of animals used in AAT, the use of animals for activities that do not have a significant and demonstrable educational component (as defined above) is in violation of this Policy.

1. On site with the Program Animal Inside the Exhibit/Enclosure:
 - a. Public access outside the exhibit/enclosure. Public may interact with animals from outside the exhibit/enclosure (e.g. animal feeding, touch tanks).
 - b. Public access inside the exhibit/enclosure. Public may interact with animals from inside the exhibit/enclosure (e.g. animal contact enclosures where the animals have the option to interact with the public or not, drive through exhibits and animal rides).
2. On site with the Program Animal Outside the Exhibit/Enclosure:
 - a. Public has minimal or no opportunity to directly interact with Program Animals when they are outside the exhibit/enclosure (e.g. raptors on the glove, reptiles held "presentation style").
 - b. Supervised public may be in close proximity to, or have direct contact with Program Animals when they're outside the exhibit/enclosure (e.g. media, fund raising, photo, and/or touch opportunities).
 - c. Public may have direct contact with Program Animals or simply observe the in-depth presentations when they're outside the exhibit/enclosure (e.g. wildlife educational demonstrations).
3. Off site: Short Term - one day or less.

- a. Program Animals are presented to the public outside of the zoo/aquarium grounds. Public may have either minimal contact or be in close proximity to and have direct contact with the animals.
 - b. The accreditation standards for temporary housing, health care and enrichment apply to animals that are used in off-site programs.
 - c. CAZA policies relating to animal transport apply to animals used in off-site programming.
4. Off site: Long Term – involving overnight accommodation.
- a. Program Animals are presented to the public outside of the zoo/aquarium grounds. Public may have either minimal contact or be in close proximity to and have direct contact with the animals.
 - b. CAZA policies relating to animal transport apply to animals used in off-site programming.

CAZA encourages the use of bio-facts as a complement to the use of program animals to expand the range of storytelling and educational activities.

Policy

CAZA requires all members to review their use of animals in educational programming and develop policies and procedures for each of the types of educational activities defined above which they may be involved in. These policies and procedures must demonstrably meet the spirit of the CAZA's welfare and education position statements and the relevant elements of the CAZA Accreditation Standards.

In developing these policies and procedures members must consider, and where appropriate, directly address the following matters:

Animal Health and Welfare

Animal health and welfare are the highest priority of CAZA accredited institutions. As a result, the Institutional Program Animal Policy must include an unambiguous statement on the importance of safeguarding animal welfare. The policy must include but should not be limited to:

1. General housing, husbandry, and animal health concerns (e.g. that the housing and husbandry for program animals meets or exceeds CAZA standards and that the physical, social and psychological needs of the individual animal, such as adequate rest periods, provision of enrichment, visual cover, contact with conspecifics as appropriate, etc., are accommodated).
2. Wherever possible provide a choice for program animal participation, (e.g. retreat areas for touch tanks or contact yards, evaluation of willingness/readiness to participate by handler, etc.).

3. The empowerment of handlers to make decisions related to animal health and welfare, such as withdrawing animals from a situation if safety or health is in danger of being compromised.
4. Requirements for supervision of contact areas and touch tanks by trained staff and volunteers.
5. Ongoing evaluation of human / animal interactions to assess safety, health, welfare, etc.; and the keeping of records of issues that may have arisen in these areas.
6. Ensure that the level of health care for the program animals is consistent with that of other animals in the collection.
7. Have a long-term plan for each program animal to ensure that the animal will be properly cared for when it is no longer used as a program animal.
8. If lengthy "down" times in program animal use occur, staff must ensure that animals accustomed to regular human interactions still receive appropriate enrichment, including social enrichment, and receive the same level of care they received when they were being used in programs.

Conservation Education Messaging

As noted in the CAZA Accreditation Standards, when animal demonstrations are part of an institution's programs, appropriate education and conservation messaging must be an integral component. The Institution's Program Animal Policy must address the specific messages related to the use of program animals either directly or by reference, as well as the need to be aware and responsive to the potential for hidden or conflicting messages (e.g. allowing "petting" of an animal while stating verbally that it makes a poor pet). Ongoing evaluation of the effectiveness of using program animals must be built into education programs. Note: a copy of said evaluations must be available for review by Accreditation inspectors upon request.

Human Health and Safety

The safety of staff and the public is one of the greatest concerns in working with program animals. Although extremely valuable as educational experiences, contact with animals can pose certain risks to the handler and the public. Therefore, the human health and safety section of an institution's policy must reflect and/or provide procedures reflecting the following:

1. Animals generally considered as dangerous to humans, must be held in facilities that prevent physical contact with staff and visitors, unless a full risk assessment has been conducted and the results used to develop procedures that minimize the possibility of attacks on handlers and visitors where they are permitted to come into contact. **Note: A copy of the risk assessments conducted must be available for review by CAZA Accreditation inspectors upon request.**
2. In the event of injury occurring in a contact situation to an animal, their handler or member of the public requiring medical treatment, the CAZA National Office must be notified; a review must be undertaken and a

- follow-up report on the incident outlining the causes and measures to mitigate reoccurrences must be provided to the National Office.
3. Strategies to minimize the possibility of disease transfer from animals to humans, and vice versa (e.g. hand washing stations, no touch policies, use of hand sanitizer which the public are encouraged to utilize)
 4. Animals in contact programs must receive medical evaluations on a regular basis to ensure that they are free of diseases transmissible to people.
 5. There must be a regular program of cleaning animal waste and other debris from contact areas to which the public have access.

Staff Training

Thorough training for all handling staff (keepers, educators, volunteers, and docents) is essential to the effective implementation of this policy. Accordingly, every institution's Program Animal Policy must include a dedicated training component either directly or by reference to the institution's overall training policy. The training section of the policy must address and/or provide for:

1. A training module on CAZA's Program Animal Policy to facilitate its understanding and application by staff, including:
 - a. Procedures for reporting injuries to the animals, handling personnel or public;
 - b. Visitor management;
 - c. Medical testing, vaccination and protocols to reduce risk of transmission of zoonotic disease;
 - d. Quarantine protocols for program animals.
2. An overall program animal training protocol providing for frequency of training, the process for qualifying and assessing handlers, including who is authorized to train handlers.
3. Training content (e.g. taxonomically specific protocols, natural history, relevant conservation and educational messages, presentation techniques, interpretive techniques, etc.).
4. A progressive discipline process for addressing substandard staff performance and noncompliance with established procedures.
5. Instruction provided to staff regarding safety issues related to handlers' personal attire and behaviour (e.g. eating or drinking around animals, smoking etc.)
6. A process to document what animals each handler has been trained to manage in a way that ensures the safety of the animal, the handler and the visitors.

Logistics: Managing the Program

The Institutional Program Animal Policy must address a number of logistical issues and requirements related to program animals, including:

1. Where and how the program animal collection will be housed, including any quarantine and separation for animals used off-site.

2. Procedures for identifying animals for inclusion in programming, including the approval process and decision-making process.
3. Accurate documentation and availability of records, including procedures for documenting and where appropriate or prescribed, reporting frequency of animal use, animal behavior, and any other concerns that may arise.
4. Protocols for the transport and care of all animals that are used, particularly in off-site programs (see CAZA Transport Policy)
5. An emergency protocol including contact phone numbers that must travel with the animals.