



June 13, 2017

Mr. Mohamed Shuriye
Senior Policy and Research Officer
Municipal Licensing and Standards
City of Toronto
City Hall, 16th Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

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

I am writing to you today to share my view on the Prohibited Animal Review that the Licensing and Standards Committee is currently undertaking as well as on the content of the staff report dated May 31, 2017. By way of summary, the Canadian Federation of Humane Societies takes the approach that, while cats, dogs and a small handful of other domesticated animals may be suitable for keeping as companion animals, the vast majority of animal species do not belong in the home, school, or institutional environment in an urban location such as Toronto.

The Canadian Federation of Humane Societies (CFHS) is the national organization representing humane societies and SPCAs across the country. Canadians have depended upon Humane Societies and SPCAs for nearly 150 years to enforce animal protection laws and care for the abused and abandoned animals in our communities.

Founded in 1957, the CFHS supports the enactment of federal, provincial, and municipal legislation that promotes responsible companion animal care and protects animals from cruelty. We work on behalf of our members to end animal cruelty, improve animal protection, and promote the humane treatment of all animals. We also work with other major stakeholders, including the Canadian Veterinary Medical Association, the Pet Industry Joint Advisory Council of Canada, and Agriculture and Agri-Food Canada, with whom we make up the National Companion Animal Coalition. The Coalition was formed in 1996 to promote socially responsible pet ownership and enhance the health and well-being of companion animals.

Mobile Live Animal Programs (MLAPs)

The staff report acknowledges the human health and safety risks of MLAPs, particularly when certain kinds of animals (e.g., fowl, reptiles) are exposed to high risk members of society, such as the elderly and children under 5 years of age. However, the report stops short of making any recommendations to curtail the use of these animals in institutional settings (e.g., daycares, senior's homes) thereby keeping vulnerable members of society who live in or frequent those institutions at risk. The report does indicate that Licensing and Standards would lead a public education effort about hand hygiene, public health tips for handling animals, importance of supervising kids, keeping food and drink out of animal areas, etc., but those are unenforceable recommendations and essentially only stopgap measures that will not do enough to protect those who are most at risk.



We therefore urge that the Committee reaffirm the December 2016 Toronto City Council decision to end the use of prohibited animals by Mobile Live Animal Programs in the City.

In the meantime, the City ought to prohibit those animals (e.g. reptiles, amphibians, primates, etc.) that pose a significant health threat to high risk groups (e.g. children under 5 years of age, the elderly, pregnant women, etc.) in institutional settings as identified by Toronto Public Health, Ministry of Health and Long-Term Care and other public health agencies.

Prohibited Animal List

The only rationale the staff report puts forward for maintaining a prohibited animals list (versus a positive or permitted list) is that the other jurisdictions surveyed maintained a prohibited animals list as well. Most of these other jurisdictions created their lists quite some time ago and the lists were based almost entirely on public safety concerns (i.e. not taking into account the welfare of the animal). Moreover, the staff report contains no information regarding the benefits, including the cost-effectiveness, of utilizing a positive list approach.

The staff report also makes some recommendations in connection with the addition of certain animals to the prohibited list. These limited recommendations are desirable, but they also illustrate how ill-advised a prohibited list approach is. There is no logical reason to add cranes, flamingos and penguins to the list and not other birds. There are a multitude of other bird species that fare more poorly in captivity, that have very specialized environmental and nutritional needs, and that are impossible for individuals to keep in a home situation. In fact, there are literally tens of thousands of other bird species that should be on the list as they cannot be kept humanely as pets.

We therefore urge the Committee to send the prohibited animals list issue back to staff with a request that staff report back on the benefits of positive lists.

We thank you for your assistance with this matter. Please do not hesitate to contact the undersigned if the Committee has any questions or comments.

Sincerely,

Barbara Cartwright
CEO