From:	Liz White
To:	Clerk
Subject:	December 15, 2021 regarding Economic and Community Development Committee report #EC26.10, Request to Review Chapter 349, Animals Exception for Reptilia Zoo.
Date:	December 14, 2021 2:50:13 PM

Dear City Clerk:

Please add my correspondence, opposing the request by the Reptilia zoo for an exemption to the City's Animal Control Bylaw prohibited animal rules, to the agenda and for distribution to the Toronto Council meeting of December 15, 2021 regarding Economic and Community Development Committee report #EC26.10, Request to Review Chapter 349, Animals Exception for Reptilia Zoo.

Please find my submission below.

Thank you,
Sincerely,
Liz White
Director, Animal Alliance of Canada
416-462-9541 ext: 23
www.animalalliance.ca
December 14, 2021.
Dear Mayor and Members of Council,
I am writing in support of the unanimous recommendation of the Economic and Community Development Committee and City staff to turn down the request by Reptilia for an exemption from Chapter 349 of the Toronto Municipal Code dealing with animals.

Why the ban should remain in place:

Reptilia houses numerous dangerous animals that put members of the public, animal enforcement officers and emergency responders at unnecessary risk should they escape their enclosures due to human error, irresponsible human handling or some emergency event such as flooding, fire or break and enter.

Irresponsible handling of dangerous and venomous animals:

One video (www.youtube.com/watch?v=jWCeXsfMCZg) shows inappropriate exposure of dangerous and venomous animals to a visitor. At 2min. 53 seconds, the video shows a Reptilia handler with a 14-foot python outside of the enclosure with a visitor present. Between 16:40 to 18:20 on the same video, the handler removes two rattlesnakes from their enclosures and places them on a table. Although there is a glass partition between the animals and the visitor, the handler took an unnecessary risk in having these animals outside their cages.

Use of snake antivenom:

Overview of snake antivenom from the University of Michigan Health:
(https://www.uofmhealth.org/health-library/tm6541):
"Snake venoms can cause many problems, such as:

• Blood-clotting problems.
• Injury to muscles.
• Low blood pressure leading to shock.
• Kidney damage.
• Nervous system problems.
• Severe allergic reactions.
• Swelling.

"Antivenom is a medicine that is given to stop snake venom from binding to tissues and causing serious blood, tissue, or nervous system problems. Side effects from antivenom can include rash, itching, wheezing, rapid heart rate, fever, and body aches. The use of antivenom depends on how much poison was injected (envenomation) and the type and size of the snake. Large snakes tend to inject more venom than smaller snakes do. Antivenom is used for mild, moderate, and severe envenomations. For best results, antivenom should be given as soon as possible after the bite. It is usually given within the first 4 hours after the snakebite and may be effective for 2 weeks or more after the bite."

Access to antivenom:

During an emergency event where first responders are present, timely access to the appropriate antivenom would likely not be possible leaving first responders and others at risk.

Descriptions of some of the venomous snakes and dangerous animals housed by Reptilia:

Black Mamba: "The black mamba (Dendroaspis polylepis) is a species of highly venomous snake belonging to the family Elapidae. It is native to parts of sub-Saharan Africa. First formally described by Albert Günther in 1864, it is the second-longest venomous snake after the king cobra; mature specimens generally exceed 2 m (6 ft 7 in) and commonly grow to 3 m (9 ft 10 in). The black mamba is the most feared snake in Africa because of its size, aggression, venom toxicity and speed of onset of symptoms following envenomation, and is classified as a snake of medical importance by the World Health Organization."
(en.wikipedia.org/wiki/Black_mamba)

Egyptian Cobra: "The Egyptian cobra (Naja haje) is a species of venomous snake in the family Elapidae, classified within the subgenera Uraeus. It averages roughly 1.4 metres (4.6 ft), with the longest recorded specimen measuring 2.59 metres (8.5 ft). The venom of the Egyptian cobra consists mainly in neurotoxins and cytotoxins. The average venom yield is 175 to 300 mg in a single bite, and the murine subcutaneous LD50 value is 1.15 mg/kg. The venom affects the nervous system, stopping the nerve signals from being transmitted to the muscles and at later stages stopping those transmitted to the heart and lungs as well, causing death due to complete respiratory failure. Envenomation causes local pain, severe swelling, bruising, blistering, necrosis and variable non-specific effects which may include headache, nausea, vomiting, abdominal pain, diarrhea, dizziness, collapse or convulsions along with possible moderate to severe flaccid paralysis. Unlike some other African cobras (for example the red spitting cobra), this species does not spit venom."
https://en.wikipedia.org/wiki/Egyptian_cobra)

Eyelash Viper: "The Eyelash Viper or eyelash palm-pitviper (Bothriechis schlegelii) is a

venomous pit viper snake species found in central America and northern South America. The eyelash viper venom is mainly hemotoxic but also neurotoxic, containing procoagulants and hemorrhagic compounds. It affects both the cardiovascular system and the central nervous system, making it highly toxic, and even fatal to humans. (snake-facts.weebly.com/eyelash-viper.html) They inject the venom using their 2 extremely long fangs, located on the upper law, these remain folded back into their mouth when they're not in use."

Fer de Lance: "The fer-de-lance is the main cause of snakebite incidents within its range and bite symptoms include local pain, severe swelling, numbness, nausea, vomiting, blistering, bruising, and necrosis. They have a very potent and fast acting hemotoxic venom. They are considered the most dangerous snake species in Costa Rica, responsible for almost half of all snakebites and 1/3 of all hospitalization cases. Many people are killed each year within its range by the fer-de-lance." (snake-facts.weebly.com/fer-de-lance.html)

Green Mamba: Green Mamba is a highly venomous snake. Its venom consists of both neurotoxins and cardiotoxins. Symptoms of envenomation include swelling of the bite site, dizziness and nausea, accompanied by difficulty breathing and swallowing, irregular heartbeat and convulsions progressing to respiratory paralysis. Bites that produce severe poisoning can quickly be fatal. (en.wikipedia.org/wiki/Eastern_green_mamba)

Puff Adder: "The puff adder (B. arietans and others) is a large extremely venomous snake found in the semiarid regions of Africa and Arabia. It is so named because it gives warning by inflating its body and hissing loudly. The puff adder is about 1 to 1.5 metres (3 to 5 feet) long and is coloured gray to dark brown with thin yellow chevrons on its back. It is a thick-bodied snake with a potentially lethal bite, and it tends to stay put, rather than flee, when approached." (www.britannica.com/animal/adder#ref232275)

Western Diamondback Rattlesnake: The western diamondback rattlesnake is a venomous rattlesnake species and member of the Viper family, found in the southwestern United States and Mexico. It is likely responsible for the majority of snakebite fatalities in northern Mexico and the greatest number of snakebites in the U.S. (en.wikipedia.org/wiki/Western_diamondback_rattlesnake)

Constricting snakes:

Green anaconda: Green anacondas are one of the largest snakes in the world. Females are considerably larger than males. They can reach lengths of 30 feet (9 meters), diameters of 12 inches (30.5 centimeters) and can weigh 550 pounds (250 kilograms). Due to their size, green anacondas are one of the few snakes capable of consuming a human, however this is extremely rare. (nationalzoo.si.edu/animals/green-anaconda)

Reticulated Python: The reticulated python (Malayopython reticulatus) is a python species native to South and Southeast Asia. It is an excellent swimmer, has been reported far out at sea, and has colonized many small islands within its range. It is among the three heaviest snakes. Like all pythons, it is a non-venomous constrictor. Adult humans have been killed (and in at least two reported cases, eaten) by reticulated pythons.

Amethystine Python: The amethystine python (Simalia amethistina), also known as the scrub python or sanca permata locally, is a species of non-venomous snake in the family Pythonidae.

The species is found in Indonesia, Papua New Guinea, and Australia. Popular among reptile enthusiasts, and noted for its coloration and size, it is one of the six largest snakes in the world, as measured either by length or weight, and is the largest native snake in Australia and Papua New Guinea.

Crocodillians:

Nile Crocodile: Nile crocodiles are opportunistic apex predators; a very aggressive species of crocodile, they are capable of taking almost any animal within their range. They are generalists, taking a variety of prey. Their diet consists mostly of different species of fish, reptiles, birds, and mammals. They are ambush predators that can wait for hours, days, and even weeks for the suitable moment to attack. They are agile predators and wait for the opportunity for a prey item to come well within attack range. Even swift prey are not immune to attack. Like other crocodiles, Nile crocodiles have an extremely powerful bite that is unique among all animals, and sharp, conical teeth that sink into flesh, allowing for a grip that is almost impossible to loosen. They can apply high levels of force for extended periods of time, a great advantage for holding down large prey underwater to drown.
(en.wikipedia.org/wiki/Nile_crocodile)

Conclusion:

I urge you to support the recommendation by the Economic and Community Development Committee to turn down the request by Reptilia to be exempt from the prohibited species list. The possession of dangerous and venomous animals puts members of the public, animal by-law officers, emergency responders and others at risk due to irresponsible human behaviour, human error and emergency events such as fires, floods or break and enter.

Final Request:

Please add this letter from Animal Alliance of Canada as correspondence opposing the request by Reptilia for an exemption to the City's Animal Control Bylaw and distribute it to Toronto Council for the December 15th meeting.

Sincerely,

Liz White, Director
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