



Date:

Sunday, March 22, 2026 5:50:44 PM

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Good evening, sorry for the delay in disseminating these responses. There was a miscommunication about who was to send them. Please don't hesitate to reach out should you have any additional questions or require clarification about any of the responses.

Q&A

1. How many licences are issued in London for Pet Shops and for Seasonal Sales Businesses?

The City publishes the licence categories, fees, and a property inquiry system where active business licence files can be searched. There are currently 7 licensed pet shops and no licensed seasonal sales businesses.

2. Within Seasonal Sales Business licences, does the City know how many licences are issued for retail establishments selling gardening products?

The by-law definition for "Seasonal Sales Business" includes "flowers" and "gardening products," and the City's business licence page also describes this category as including "garden centres, produce, etc." There are no licenses issued for seasonal sales currently. The licence periods are for 1-3 months or 7 days – and they generally start purchasing licenses in May or later. In 2025 there were zero '7 day' licences for gardening products, and 3 '1 – 3 months' licenses (plus 1 for sale of Christmas trees).

3. Does the City collect any information about the types of animals and plants that are distributed or sold at licensed establishments?

The by-law requires licensed pet shops to maintain a log containing the species of animal, general description, gender, age, vaccination record, and where the animal was acquired from, and to keep that information for two years. The by-law also restricts pet shops to animals or classes of animals prescribed by the Licence Manager. It has not been past practice to proactively collect this information, however. If a complaint was received, an MLEO would request it.

For Seasonal Sales Businesses, we have not collected information on plant types being distributed or sold.

4. Does the City have the ability to collect additional information to what is included in the Business Licence Application Form about particulars of a business?

The general by-law requires applicants to provide all information requested on the application form, along with any supporting materials the Licence Manager deems necessary, including proof relating to zoning, occupancy interest, and other requirements. The Licence Manager also has authority to prescribe the format and content of forms and other documents required under the by-law, and to prescribe criteria for requirements or approvals not otherwise specified. The City Clerk must maintain a record of regulations prescribed by the Licence Manager.

That said, there is an important distinction between:

- collecting more information administratively on an application form, and
- imposing new substantive disclosure obligations on a class of business.

For the second type, the best course of action is usually an explicit by-law amendment or schedule-specific regulation.

5. Under Schedule 14 section 2.1(d), what information is currently prescribed by the Licence Manager as required under section 4.6 to provide to a person who purchases, acquires or obtains an animal from the Pet Shop licence holder?

The by-law authorizes the Licence Manager to prescribe that information, and section 4.6 requires the pet shop to provide it to the purchaser or acquirer.

4.6 Every Pet Shop licence holder shall provide to a person who purchases or acquires an animal from them all of the information about the animal as prescribed by the Licence Manager.

5.1 The following information is required for the purposes of s. 2.1(d) of Schedule 14 of the By-law:

a) every customer who purchases a domestic dog or cat shall receive the following information from the Pet Shop Business:

- i) breed of animal;*
- ii) general description;*
- iii) gender;*
- iv) age;*
- v) vaccination record; and*
- vi) where the animal was acquired from.*

6. Does the City of London provide information to Pet Shop license holders to distribute to clients? How?

No, we do not.

7. How does the City enforce requirements for information to be provided to consumers at retail settings under the schedules listed above?

Under the by-law, licensees must permit inspections at reasonable times, comply with all by-law requirements and conditions, and comply with applicable laws. Where a licensee does not meet the by-law requirements or licence conditions, the Licence Manager may refuse, suspend, revoke, or impose terms and conditions on the

licence. Contraventions can also be addressed through court orders and the Administrative Monetary Penalty System. Inspections are generally conducted upon receipt of a complaint however, there are instances where the MLEO team conducts proactive spot checks.

Applied to consumer-information requirements, that would generally mean enforcement through:

- inspections or compliance checks,
- follow-up where required information is not being posted or distributed,
- possible licence conditions or licensing action, and
- penalty proceedings where warranted.

8. Do larger horticultural retailers such as garden centres and big box hardware stores that operate their outdoor retail premises on a seasonal basis require a business licence?

No

9. Are there any legal or logistical barriers to requiring Pet Shop and Seasonal Sales Business licence holders to display or provide information about invasive plants and animals?

Schedule 14 gives the Licence Manager authority to prescribe purchaser information under section 4.6, so adding invasive-species education tied to animals sold in pet shops appears legally achievable, provided the content stays within the scope of that delegated authority and is drafted clearly. This would require further confirmation and further consultation with Legal prior to implementation.

For Seasonal Sales Businesses, the current schedule is narrower. Its delegated authority is focused on site-specific operational rules to ensure the business does not obstruct pedestrian or vehicular traffic. It does not contain a parallel power to prescribe consumer education materials about plants or invasive species. Most appropriate course of action would be a Council amendment to the Business Licensing By-law expressly creating that authority.

In terms of logistical barriers there are few; more so operational considerations:

- defining which products trigger the notice,
- keeping the material current and legally accurate,
- deciding whether the requirement is a handout, sign, shelf label, or all three,
- training staff and educating businesses on what's required for compliance, and
- resourcing inspections and updates.

There is also a key consideration if looking at an amendment- any requirement should be precise enough to be enforceable and easy for retailers to follow. The City's existing fireworks model shows that point-of-sale consumer information can be required and administered where the by-law expressly provides for it.

10. What is the process for the City to establish a new category/schedule under the Business Licensing By-law?

A new licence class or schedule would require a Council approved amendment to the Business Licensing By-law. The Licence Manager can make regulations only within the authority already delegated by the by-law and its existing schedules; the Licence

Manager cannot create a brand-new licence category by regulation alone. In practice, the process would normally be:

- policy review and internal staff analysis,
- preparation of a staff report with recommended by-law amendments,
- consultation/ bylaw drafting with Legal,
- committee debate/Council consideration, and
- enactment by Council if approved.



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