

From:
Vicki Van Linden
431 Ridgewood Crescent
London, ON, N6J 3H2

August 15, 2018

Letter for inclusion in the minutes of the Council meeting of August 28, 2018, regarding a matter addressed in the 8th report of the Animal Welfare Advisory Committee at the CPSC meeting of August 14th, 2018

Dear Mayor and Councillors:

I am contacting you in support of the delegation on August 14th, 2018 from the Chair of the Animal Welfare Advisory Committee, asking you to expedite a staff report on a proposed bylaw amendment.

The purpose of the proposed bylaw amendment is to remove an exemption that allows the keeping and display of prohibited species of animals, including various species of snakes in: "a public park, zoo, fair, exhibition or circus operated or licensed by a municipal or other governmental authority".

The amendment I refer to is related to Animal Bylaws, PH-3/ Section 3 - item 3.6, regarding the APPLICATION OF BY-LAW EXEMPTIONS.

Since the province of Ontario has no licensing process for the keeping and display of exotic animals, any form of licensing would come from the municipality. The bylaw as written does not state what type of license is referred to.

The requested bylaw amendment will remove this exemption, an exemption that offers no benefit to the city. Exemptions such as this allow the proliferation of businesses that promote an out-dated view of living beings as objects for human entertainment, regardless of the degree of harm and suffering inflicted on the animals involved. This archaic view of animals promotes a lack of compassion for animals which can lead to irresponsible treatment of them. There is no social benefit to a community in fostering a lack of compassion for vulnerable beings.

The species of animals that are on the prohibited list are there for good reason. They are species of wild animals that can pose a potential threat to humans through transmission of disease or ability to inflict injury. As well, these species are not easily housed and provided for in the same way that a domesticated species like a dog or cat can be cared for. The keeping and display of such wild species exposes them to poor living conditions and chronic distress.

This amendment request is of particular concern because of the interest expressed by a zoo business in opening a facility in London. This business already operates a zoo facility in another municipality. I visited that facility and observed poor quality enclosures designed to appeal to the human viewer, as opposed to providing a reasonable quality of life for the animals confined there. I also observed reptiles exhibiting behaviours that are known to be demonstrations of discomfort and distress caused by the conditions of their confinement.

Such businesses also encourage the pet trade in such animals. The presence of certain types of snakes in private homes can pose a risk to police service personnel. When there are welfare concerns and such animals require rescue or protection there is no adequate system of sheltering in Ontario for reptiles and amphibians. Indeed, the only solution available when such an animal needs rescue is to hand over the animal to another zoo business, simply perpetuating the problem.

The benefits to tourism that such a business provides have been over-stated, in my opinion. It's likely that the chief financial benefit to the zoo business itself is to use the facility as an anchor for Mobile Live Animal Programs (MLAPs) where animals are hired

out to private events. These provide no tourism benefit to the city. But, an increase in the numbers of reptiles and amphibians sent about in the city, and an increase in such animals in homes can create additional demands on public health and animal control enforcement.

As a caring and socially responsible community we should always be concerned about animal welfare. An example of the poor welfare standards at the zoo facility this business presently operates is the Sulcata Tortoise enclosure. Sulcata Tortoises are large animals who would normally travel as many as five miles each day. Like many species of wild animals, they are hard-wired to travel long distances to forage. When confined in a small space their evolutionary needs and behaviours do not change, and they are driven to engage in their natural behaviours.

I observed three Sulcata Tortoises in a very small enclosure where they moved around the perimeter constantly. They have no other way to satisfy their ingrained, instinctual drive than to circle around in a constant, boring and meaningless way. Boredom and frustration are forms of distress for captive wild animals. Other animals confined at this facility are also housed in inadequate conditions and were seen displaying behaviours that are known indicators of distress.

Setting aside the serious issue of poor animal welfare, another concern is the way that such businesses promote the captivity of reptiles and amphibians in the pet trade. As one leaves the zoo portion of this business's present facility there is a large area where tanks and other supplies for the keeping of reptiles and amphibians are sold. This is surely meant to encourage impulse purchases of such equipment after seeing the captive animals displayed. Once that equipment has been purchased, the obvious next step would be to acquire an animal to fill the tank.

London's animal services, as well as humane societies and SPCAs are not well equipped to monitor, protect or rescue such animals. We have enough expense and difficulty responding responsibly to the presence of dogs and cats in our community, and there is no benefit for us to encourage expanding the keeping of reptiles and amphibians in London homes.

There are limitations in how a municipality can oppose the entry of a business from setting up in our city. But I urge you to protect the interests of the city, and to avoid provision of licensing or zoning accommodations that would allow a reptile zoo or similar facility to establish itself in London before this bylaw amendment has been fully reviewed. This will prevent prohibited classes of animals from being incorporated into a new zoo facility before the amendment has been fully reviewed.

And, ultimately, I urge you to remove the exemption, as already proposed by the Animal Welfare Advisory Committee.

Best regards,

Vicki Van Linden

On behalf of FOCA – Friends of Captive Animals
(A grassroots, London-based group)
431 Ridgewood Crescent
London, ON, N6J 3H2
519-474-1980