

From: Melissa Matlow
Sent: Monday, December 10, 2018 9:52 AM
To: CPSC <cpsc@london.ca>
Subject: Re: Zoos and Mobile Zoos report

Dear Chair and Committee Members,

On behalf of World Animal Protection and our 350,000 supporters across the country (including more than 4,500 residing in London, Ontario), I would like to submit our concerns and recommendations in response to the Report on Zoos and Mobile Zoos.

A major animal welfare issue that World Animal Protection deals with is the legal and illegal wildlife trade. Whether poached from the wild or bred in captivity, millions of wild animals suffer from being repeatedly transported, handled and kept in the homes of consumers in inappropriate conditions that fail to meet their complex needs. Locally, this is placing an unnecessary burden on animal shelters and enforcement officers who have to deal with the problems encountered when these animals are neglected, abandoned or escape. We are extremely concerned about the increase of mobile zoos in Ontario that operate at a standard of their own choosing and we therefore urge London to show leadership and take responsibility in helping us curb this problem.

Zoocheck, an Ontario-based animal protection charity, has identified more than 70 mobile zoo businesses in our province alone – a number that has grown dramatically over the last decade. The mobile zoo business model is typically centered on obtaining the maximum number of event bookings possible, with the marketing hook often being that customers can directly interact with animals (e.g., touching) or get into close proximity to them.

Animal welfare concerns

Using wild animals for entertainment is inhumane, unsafe and sends the wrong message to the public about how to interact with wildlife, even though mobile zoo businesses claim that it is educational or otherwise beneficial. It can also be very stressful for animals, whether they are transported only occasionally or on a regular basis, and particularly when they are displayed, handled, repeatedly touched by children and exposed to unfamiliar locations. The small barren environments, used in transit and often onsite as well, deprive wild animals of opportunities to behave and move naturally, which may result in physical, psychological and social stress. Even in the best captive circumstances, it can be extremely challenging to satisfy an animal's full range of biological and behavioural needs. The best that mobile zoos can provide are rudimentary conditions that lack appropriate space, complexity, environmental conditions and other critical husbandry factors.

Human health and safety concerns

The types of animals commonly used in the mobile exotic programs (i.e., reptiles, amphibians, birds) are well known to shed more potentially pathogenic organisms than other animals. It is concerning that mobile zoos often bring their animals to daycares, birthday parties and seniors homes, as children and seniors are among the most vulnerable to the health risks (e.g., zoonoses) posed by exotic animals. The Ontario Ministry of Health and Long-term Care's own guidelines for petting zoos discourages children under the age of five, and other vulnerable people, from coming into contact with reptiles and amphibians among other types of animals.

Promoting the acceptability of keeping wildlife as pets

Public polling conducted this year by StratCom Strategic Communications indicates that 26% of Canadians are interested in owning an exotic pet because of zoos and mobile petting zoos and 43% say their exotic pet purchase was impulsive. The same research found that 30% of Canadians surveyed who owned an exotic pet spent only a few hours or less researching prior to purchasing one, while 17% did no research at all.

Recommendations

Given the high risks and problematic aspects of zoos and mobile zoos, we strongly recommend you refer the Zoos and Mobile Zoos report back to the Managing Director, Development and Compliance Services and Chief Building Official for a more comprehensive review. This review should include a more complete assessment of the

offsite presentations of mobile zoo businesses (including Reptilia), the welfare conditions endured by the animals used, the human health risks posed by these kinds of activities, and other associated issues, including the capacity of the City to actually provide oversight of mobile zoos and enforcement of municipal laws and rules.

In addition, I would strongly urge the CPSC to order staff to examine and report back on the advantages of proceeding with the changes to London's animal control bylaw PH-3 that were proposed by the City's Animal Welfare Advisory Committee. In our view, that would be the easiest way to address the entire range of concerns expressed.

We hope you will consider referring this issue back to staff as we would also like the opportunity to provide further input during the process.

Thank you for your time and consideration.

Sincerely,

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