

Dear Committee Members,

By way of very quick introduction, I am a freelance artist-writer-conservationist, with experience in the areas of wildlife rehabilitation and human-wildlife conflict resolution. I am also a founding director of Species Survival Network, which entirely focuses on the area of conserving wildlife and wild plant species in international trade, as regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which just concluded its 19th Conference of the Parties, in Panama City, bringing several greatly needed levels of protection to endangered herptiles (reptiles and amphibians), issues I particularly worked on – some of which was touched upon by this op-ed piece I wrote for the Toronto Star (see <https://www.thestar.com/opinion/contributors/2022/10/09/help-keep-endangered-frogs-from-croaking.html>).

I'm happy to say that this entire family of neotropical frogs now has an added level of protection under CITES, as do many turtles and other reptile species, thanks to the kind of work my colleagues and I do. They still face multitudinous threats to survival but we have mitigated against a major threat, the so-called exotic pet industry.

Which brings me to Reptilia, and its desire to continue construction of their facility even though they do not have the required exemption for many of the animals they want to keep and where, it appears, they hope to attract income from tourists driving the 401. While I could discuss my concerns with Reptilia's overall treatment of animals, there is another concern that I respectfully draw to your attention. It really relates to the frustration we, in the conservation movement, have, when it seems not to matter that science, law, and facts are supportive of our conservation concerns – and it does not matter! For reasons better articulated by historians, behaviorists and sociologists than by me, we seem to increasingly be sinking into an era where facts don't matter, where misinformation is expected to be believed, opinions are treated as facts, and laws don't matter so long as there is money to be made.

I have read claims made by Reptilia and its representatives that are simply and provably false, such as the erroneous claim that a provincial native wildlife permit gives them an exemption from other laws, like London's animal control bylaw. It very clearly, and very specifically does not. Decisions affecting the public should not be based on misinformation, but on facts.

Which brings me to the second issue, which is less decisively determined, and that is the claim or allegation often made by Reptilia that it is a "sanctuary". In my world, drawing from a long life of experience, Reptilia is not in any way a sanctuary; it is a private, for-profit zoo, and not a particularly good one in terms of the functions society increasingly expects zoos to provide. It is a store-front zoo and what in England is sometimes referred to as a travelling zoo, deemed by actual conservationists to be antithetical to the cause of conservation.

My former employer for twenty years, recently passed away, was co-founder of GFAS, The Global Federation of Animal Sanctuaries (GFAS; see <https://www.sanctuaryfederation.org/accreditation/>), the leading sanctuary association in the world, which has a list of criteria for accreditation. Reptilia does not meet many, if any, of their criteria for membership.

Reptilia also claims to be a rescue centre that takes in unwanted "pets", but they offer no numbers or outcomes for animal placement like nearly all bona fide rescues do. And because they sell reptile pet supplies, they would seem to be encouraging the keeping of these animals and making their problems even worse than they are.

I also have to add that the managers of every sanctuary and every wildlife rehabilitation/rescue facility I have visited around the world very emphatically assured me that pretty well the first priority is to assure that they are in full compliance with local laws and other laws and regulations. They are all non-profit, non-government organizations serving a need.

I sincerely believe we must get back to a more factually-driven narrative as it applies to social policy. Please do not be fooled by unverifiable claims and misinformation.

Yours truly,

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