

To: Community and Protective Services Committee

To be helpful, I write to you regarding animal welfare concerns as it relates to the current request from Reptilia Zoo for an exemption to the Animal Control Bylaw and AWAC's past careful examination, research, and consequential best advice to the City of London as follows:

The Animal Welfare Advisory Committee recommended:

- There be No amendment to the Animal Control Bylaw, and that council reaffirm that the exemption in the Animal Control By-law for animals licensed by the province is limited to the animals held under their provincial license, (those listed as specially protected or game animals under the Ontario Fish and Wildlife Conservation Act), and that ALL other animals continue to be subject to the current municipal animal control by-law.

Background:

- The request by Reptilia Zoo for an exemption to our current Municipal Bylaw, regarding the keeping of exotic animals before you is disconcerting, as decisions made today set a precedent for other like private zoos and Mobile Live Animal Programs wishing to bring exotic and potentially dangerous animals to London, offsite, posing significant health and safety risks due to incidence of handling the animals and exposure to infectious disease, putting the young, immunocompromised, and elderly at great risk.
- Concerns regarding the ability of Reptilia Zoo to properly care for such animals was raised in a 2021 staff report from the City of Toronto in collaboration with Economic Development and Culture, and Toronto Public Health outlined animal welfare concerns related to Reptilia Zoo's operations They stated "Based on the information received, staff have significant concerns regarding the outcomes of past investigation and inspections by Provincial Animal Welfare Service." The report also contained concerns about the adequacy of care provided to the animals as it related to past investigations and inspections of Reptilia Zoo by the Ontario Ministry of the Solicitor General's Provincial Animal Welfare Services (PAWS).
- London's current Animal Control Bylaw restricts the keeping of class 5 animals (non- venomous snakes, lizards, and spiders) and prohibits the keeping of class 7 animals such as crocodilians, alligators, and venomous snakes, lizards, spiders, to name a few.
- As of 2022 Reptilia Zoo is no longer listed on Canadian Association of Zoos and Aquariums website.
- In 2011 The City of London took progressive action of removing private zoos from the Animal Control Bylaw and from Zoning due to animal welfare, public concern, and the excessive challenges, and burden to the city as it related to welfare concerns with private zoos.
- At December's 2018 Council Meeting, council rejected Reptilia Zoo's proposal to open a facility and declined an amendment to regulate private zoos.
- In April 2022, Reptilia Zoo's request for an exemption was rejected by Council.

The Animal Welfare Committee maintains the following concerns for human health, safety, and animal welfare regarding exotic animals:

The potential increase in exotic animal businesses seeking exceptions and expansion in the number of these animals kept in the city could **undermine and:**

- Escalate the undue burden to City staff and to public health and safety and any past improvements to animal welfare. The Province does not currently regulate non-native species. The NDMNRF has no jurisdiction over them. Instead, they are regulated and/or prohibited by municipal by-laws. The municipality of Grand Bend established a bylaw prohibiting exotic animals in April of 2019 due to such concerns as it related to exotic animals.
- Put the public at risk for injuries and the spread of infectious diseases such as salmonella, particularly when animals are taken off-site for events such as birthday parties.
- Our local hospitals ability to respond as they are not equipped to address any venomous snake bites that may occur.

In conclusion:

The intention of the current bylaw and zoning prohibitions pertaining to private zoos and mobile zoos IS progressive as it relates to animal welfare as well as the City's leadership in this space.

From the description, of activities advertised on Reptilia Zoo's website, they showcase mainly non-native animals. These species are beyond the jurisdiction of the FWCA and are currently not regulated by the province.

What we have here, is a private zoo, operating out of a Mall, under "a place of entertainment", however, under the definitions Reptilia Zoo IS a private zoo.

In 2011 the City of London recognized public concerns regarding the keeping of exotic animals in private zoos as well as the undue burden to the city without Provincial Oversight, which remains a concern today.

Since then, exotic animals have been removed from Storey Book Gardens as well as remaining farm animals due to animal welfare concerns.

Circuses using exotic animals for entertainment are no longer considered to be ethical and no longer welcomed by the City of London residents. Private and mobile zoos continue to pose tangible risks and animal welfare concerns for those municipalities without progressive zoning and bylaws to prohibit them.

Sincerely,
Wendy Brown
Animal Welfare Advisory Committee Chair