



November 28th, 2022

To the City of London Community and Protective Services Committee,

As a globally recognized expert on animal businesses and animal protection, I wish to convey my opposition to the company Reptilia being granted an exemption to the City of London Animal Control Bylaw PH-3. Reptilia is a commercial entity that seeks to make money by transporting and displaying wild animals. I support a thoughtful, sustainable, and ethical approach to businesses involving animals in the City, including new businesses, but not Reptilia's approach. It does not make sense for the City, economically or ethically.

Reptiles have advanced cognitive, emotional, and social capacities, clear sensitivities, and specialized species-specific environmental needs. They can experience mental and physical distress, pain, and suffering. Public opinion on the keeping and displaying captive animals is changing and reflects growing discomfort with the risks of proximity to animals who may carry zoonotic diseases (animal-human transmission) as well as ethical concerns about the physical and psychological wellbeing of wild animals kept in cages and containers. This shift in public sentiment is for good reason. The more we learn about animals' minds, social patterns, and behaviours, the more it is clear that mobile exhibits are not appropriate. Animals kept in such conditions cannot engage in natural behaviours and, quite simply, cages and boxes are not where these animals are meant to live.

Reptilia's business model includes not only zoo gallery/space rentals and onsite events but also additional offsite commercial activities involving animals (e.g., children's parties, retail venues, consumer shows, corporate gatherings, summer camps, religious institutions, seniors' homes, etc.). The risks of moving wild animals, including dangerous species, are clear. These include both health and safety concerns. The bylaw exists for all of these reasons and is sound public policy, in keeping with established and growing trends across Canada and around the world.

This issue has been addressed by Council a number of times including in April 2022 and December 2018. The matter of private zoos was also addressed by Council in 2011. Nothing new is being brought forward and given the many pressing and important issues facing our community, revisiting this one is inefficient and a poor

use of time. Similarly, the City does not have the time or resources to monitor Reptilia's activities or the capacity to properly assess them. The Provincial Animal Welfare Service inspectorate could examine specific issues, but this venture would largely be an under-regulated situation, augmenting the risks for people and animals alike.

To be clear, Reptilia is not a sanctuary. Sanctuaries cost money, they don't make money. Reptilia is a business. Rescuing some animals (the number and results for animals held by the company are unclear) does not make up for the physical and psychological stress caused to those and other animals who are trucked around and put on display to make this company money. Real rescues and sanctuaries place animals' needs first, not commercial goals. In fact, the Reptilia model likely fuels demand for the keeping of wild animals as pets, further exacerbating the problem and costing the public sector more money in the medium and longer term. The more that animals are kept in private hands away from their natural habitats, the more likely they will be poorly treated, escape, transmit diseases and germs, and need to be "rescued."

The bylaw is sound, and I urge you to reject the request for an exemption.

Sincerely,

Dr. Kendra Coulter

Professor

Fellow, Oxford Centre for Animal Ethics

Member, Royal Society of Canada's College of New Scholars, Artists, and Scientists