

Mayor and Members of Council
City of London
300 Dufferin Avenue
London, ON N6A 4L9



Dear Mayor and Members of Council

13 February 2022

Reference: Reptilia application exemption Animal Control Bylaw PH-3 Class 7 animals and creation of business license for exotic animal establishments

On behalf of World Animal Protection and our more than 160,000 supporters in Ontario, I urge you to protect animal welfare and public health and safety by rejecting amendments to Animal Control Bylaw PH-3 and the Business Licensing Bylaw.

Animal welfare

There is a large body of well-supported evidence which shows that the use of reptiles in entertainment settings can be detrimental to their physical and psychological health. The cognitive, emotional, and social capabilities of reptiles, in combination with their complex lifestyles, behaviours and their need for specific environmental conditions make them utterly unsuitable to be used in interactive programs, whether on-site or at off-site locations, such as those conducted by Reptilia.

World Animal Protection is also concerned about the welfare of animals at Reptilia's permanent locations. Not only are many enclosures at Reptilia typically undersized, and lacking meaningful enrichment, they are also seemingly informed by outdated folklore husbandry beliefs and practices¹. In fact, Provincial Animal Welfare Services (PAWS) inspectors found basic animal husbandry issues at Reptilia during inspections in 2020², including but not limited to:

- Animals without access to drinking water.
- Dirty exhibits

¹ Supposed 'best practices/methods' which become established without proper evaluation, often justified simply because 'it has always been done that way' despite lack of evidence.

² <https://www.toronto.ca/legdocs/mmis/2021/ec/bgrd/backgroundfile-173358.pdf>



- 5 exhibits without working lights.
- Animals that had retained their shed due to improper humidity and temperature.
- Discrepancies in feed rotation with some animals not being fed up to 4 weeks, while they are supposed to be fed every 2 – 3 weeks.
- Five animals with concerning body conditions, so much that an order was made for these animals to see a vet.

As a result of the investigation, numerous orders were issued and 30+ animals were moved to Indian River Reptile Zoo.

Public health and safety

The health of reptiles may be comprised due to the stress of inappropriate keeping, husbandry practices, travelling and handling, which impacts their immune systems making them more prone to falling ill and more likely to shed pathogens that can cause illness in people. Reptile-related nationwide disease outbreaks have occurred in 2014 and 2021.^{3,4} People most at risk of contracting diseases from reptiles include children younger than 5 years of age, people over 65 years of age, pregnant individuals or people with compromised immune systems. The Ontario Ministry of Health and Long-Term Care advises people who fall in these categories to avoid keeping and/or interacting with reptiles and that these animals should not be allowed in facilities where people who are at risk convene.^{5,6} Despite these public health warnings many Reptilia programs (e.g., Gecko Habitarium School Program⁷, Meet & Greets⁸ and birthday parties⁹) are targeting audiences that include people who are at high risk of infection.

The keeping and use of dangerous animals, such as large constrictor snakes, venomous snakes and crocodylians can also pose a public health and safety risk since these animals are capable of severely injuring or killing a person. Crocodylians are known to have one of the strongest bite forces in the animal kingdom while Burmese pythons and other large constricting snakes have rows of needle-sharp recurved teeth and can exert enough pressure

³ <https://www.canada.ca/en/public-health/services/public-health-notices/2019/outbreak-salmonella-infections-snakes-rodents.html>

⁴ <https://www.canada.ca/en/public-health/services/food-safety/public-health-notice/2014/public-health-notice-outbreak-salmonella-infections-linked-contact-bearded-dragons.html>

⁵ https://www.health.gov.on.ca/en/public/publications/disease/salmonella_arfr.aspx

⁶ [Management of Animals in Child Care Centers, 2016](#)

⁷ <https://reptilia.org/gecko-habitarium-school-program/>

⁸ <https://reptilia.org/meet-greet-appearances/>

⁹ https://reptilia.org/birthday-party/?_ga=2.181886574.855656833.1641912008-1360529121.1641912008



to eat prey like young deer and cattle. Handling venomous snakes is extremely dangerous as well, as these snakes are often very agile and can strike in a split second. Another concerning issue is that appropriate snakebite treatment by medical professionals is probably not available in the City of London region. Professionally run zoos adhering to the highest public health and safety standards do not conduct interactive sessions with dangerous animals, nor would they allow the public to be in close proximity with these kinds of species.

Zoo accreditation

Reptilia, at the time of writing, is not accredited by Canada's Accredited Zoos and Aquariums (CAZA) nor by the Global Federation of Animal Sanctuaries (GFAS) or the Association of Zoos and Aquariums (AZA). The latter two institutions are widely acknowledged to operate according to the highest animal welfare and public health and safety standards.

While Reptilia's lawyer recently sent a letter indicating that the Reptilia London would apply once again for CAZA accreditation, the accreditation process can take many months and there is no guarantee of accreditation being granted. It is worth noting that Reptilia's two other locations are no longer accredited.

World Animal Protection is also deeply concerned with the latest amendment that was adopted at Community and Protective Services Committee (CPSC) to include the Zoological Association of America (ZAA) accreditation as an acceptable standard.

The ZAA is known for accrediting roadside zoos, travelling zoos, animal breeders and others who are not able to meet AZA standards and approve the keeping of wild animals as pets.^{10,11} They also encourage contact between the public and potentially dangerous animals like elephants, rhinos, chimpanzees, bears, and Komodo dragons¹¹ and accredit facilities that still provide elephant rides¹² - a form of entertainment banned by AZA and CAZA.

Proposing the inclusion of ZAA accreditation in any London bylaw is ill-conceived and will set a dangerous precedence that will negatively impact

¹⁰ <https://bigcatrescue.org/wp-content/uploads/2014/07/ZAA-Factsheet.pdf>

¹¹ <https://zoo.org/resources/Documents/ZAA%20AccreditationStandards.pdf>

¹² For example, [Natural Bridge Zoo](#) in Virginia, US



animal welfare, public health and safety, and conservation. It also completely contradicts public opinion¹³:

- 97% of Ontarians (somewhat) support **provincial regulations** that would require all zoos to have a license.
- 87% of Ontarians (somewhat) support provincial regulations **prohibiting zoos and mobile zoos from offering close interactions with wild animals.**

Conclusion

In summary, World Animal Protection opposes amendments to the Animal Control Bylaw and Business Licensing Bylaw due to serious animal welfare, public health and safety, and other issues associated with commercial zoo and exotic animal establishment businesses.

If you have any questions about this submission, please reach out to 416-369-0044 x 115 or to MicheleHamers@worldanimalprotection.ca.

Yours sincerely

A handwritten signature in black ink that reads "Michele Hamers".

Michèle Hamers
MSc, MRSB, EurProBiol
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World Animal Protection

¹³ [2022 Nanos Polling](#)