

Tuesday February 14, 2023

Dear Members of London City Council,

I am writing to share concerns about the proposed amendments to the Animal Control By-law and Business Licensing By-law and their implications for the environment. I am the Chair of the Environmental Stewardship and Action Community Advisory Committee. The committee aims to advise Council on matters related to [our mandate](#) which includes: the development and monitoring of London's Climate Emergency Action Plan, the maximization of the retention of natural areas and to act as a resource for other related policies and strategies. **I believe the proposed By-law amendments carry certain risks to the environment and to efforts to conserve biodiversity in London, and I urge Council to consider them as part of its decision.**

Allowing the Reptilia Zoo, which is already licensed to display native species, to expand their business in London to include most non-native (exotic) species, will provide opportunities for members of the public to interact with a variety of captive animals in both onsite and offsite venues. While I appreciate the desire to create positive experiences for Londoners to learn more about reptiles, I am concerned these experiences could lead to unintended environmental effects in the longer term, including:

1. **Lack of enforcement capacity.** It is my understanding that the [Ontario Provincial Animal Welfare Services \(PAWS\)](#) will not be able to provide sufficient enforcement capacity to oversee exotic zoos in London. PAWS typically responds retroactively to complaints, and they do not deal with matters concerning environmental risks, safety risks, possession of animals or nuisance issues. Furthermore, PAWS is not a regulatory body. Regarding the intersection between provincial and municipal jurisdiction, the section 67 of the Ontario PAWS Act states: "*In the event of a conflict between a provision of this Act or of a regulation made under this Act and of a municipal by-law pertaining to the welfare of or the prevention of cruelty to animals, the provision that affords the greater protection to animals shall prevail.*" Does the City of London have resources to expand enforcement of its Animal Control By-law to include oversight of exotic animals kept in zoos and other situations, including Reptilia and others that may fall under the proposed exemption in the future?
2. **Elevated risk of dumping and escaping non-native species.** Reptilia's business model includes activities that support the ownership of exotic pets. For instance, through their Reptile Supply Store, Reptilia generates revenue from sales of housing and husbandry supplies and paraphernalia for keeping reptiles in captivity at home. Most zoos and conservation organizations do not encourage or facilitate the keeping of non-native exotic wild animals by members of the public. In Ontario, the purchasing and handling of exotic animals in the pet trade is afforded limited to no oversight by authorities, resulting in widespread cruelty, neglect, members of the public removing animals from the wild and illegal dumping.

Several non-native exotic species kept as pets in London have already been repeatedly introduced into the wild accidentally or purposefully by owners who no longer want them, including [red-eared slider turtles](#), [goldfish and koi](#), [domestic cats](#) and non-native rabbits. Many additional species have also established themselves (i.e., reproducing in the wild) in other regions of Ontario. As more introduced species become established in parts of London's Natural Heritage System, they cause widespread impacts to ecosystems and native species that are prohibitively expensive and difficult to manage (see information by the [Canadian Council on Invasive Species](#) and [Brown, 2006](#)).

I anticipate that the Reptilia zoo's promotion of the exotic reptile pet trade will lead to increased interest and more people purchasing pets on impulse. Over time, this will precipitate an increase in non-native animals escaping, being abandoned or dumped into local environments (see [Stringham and Lockwood, 2018](#) and [Lockwood et al., 2019](#)).

3. **Promoting unsafe, inappropriate interactions with wildlife.** Reptilia offers their clientele experiences, both onsite and offsite, that may involve touching, handling or being in close proximity to captive live reptiles and amphibians, an activity which has been characterized as public education. I am concerned that this activity may encourage participants to interact with wildlife in London's Natural Heritage System in ways that cause harm, instead of respectfully observing wildlife from a distance. Native reptiles and amphibians that occur in London already face intense urban pressures (see [information from the Canadian Herpetological Society](#)). Unfortunately, many visitors to natural areas in London do not follow the rules displayed on signs at entrances. Will experiences handling captive animals in zoos encourage the public to pursue similar handling experiences with wild animals? This would be problematic particularly for slow-moving reptiles that are prone to harassment, chasing and capture within natural areas.
4. **Elevated risk of disease introduction to native wildlife populations.** A variety of infectious diseases are already decimating wildlife populations in Canada and throughout the world, and a significant number of them are linked to the keeping and trade of exotic pets (see review by [Bezerra-Santos et al., 2021](#)). These diseases include *Chytridiomycosis*, a fungal disease which is wiping out frog and salamander populations in the wild, and *Ophidiomycosis*, another fungal disease that is doing the same to snakes. These kinds of infectious diseases may take hold in wildlife populations through just a single introduction event, such as a release or the dumping of contaminated waste or water. If contagious pathogens spill over from captive exotic animals kept as pets into wild reptiles and amphibians, the outcome for the infected populations could be bleak.
5. **Reptiles and amphibians host a variety of potentially pathogenic infectious organisms that can be transmitted to people (zoonoses).** Young children and the elderly are at especially high risk of infection. Common zoonotic bacterial infections linked to reptiles and amphibians include *Salmonella*, *Clostridium bacterium* (botulism), *Mycobacterium*, *Campylobacter*, *Aeromonas*, *Escherichia coli*, *Klebsiella*, *Serratia* and *Flavobacterium meningosepticum*. These pathogens can be carried by healthy hosts and transmitted through direct physical contact, droppings, contaminated water and food, through contact with surfaces the animals have contacted, and by other means (see review by [Mendoza-Roldan et al., 2020](#)).

[The London Plan](#) calls for London “*to become one of the greenest cities in Canada*” (strategic direction #4) supported by using an ecosystems/watershed approach in all of its planning, protecting and enhancing the Thames Valley corridor and its ecosystem, and protecting and enhancing the health of the Natural Heritage System. As an environmental steward, I believe that strong protections for wildlife, including native reptiles and amphibians that have been identified as being at risk of extinction, should be prioritized as part of these actions.

The City of London’s [Land Acknowledgement](#) states: “*We hold all that is in the natural world in our highest esteem and give honor to the wonderment of all things within Creation. We bring our minds together as one to share good words, thoughts, feelings and sincerely send them out to each other and to all parts of creation. We are grateful for the natural gifts in our world, and we encourage everyone to be faithful to the natural laws of Creation.*”

I hope that London City Council, in recognizing reptiles and other animals both native and introduced as part of Creation, will exercise empathetic discretion as it considers changes that have the potential to severely impact the autonomy and wellbeing of those animals. Facing a climate emergency, now is the time for Council to base its decisions on evidence, and to avoid giving into temptations to prioritize short-term economic gain over long-term risks of expensive harms.

I recommend that the existing Animal Control By-law and Business Licensing By-law should remain unchanged and for Council to decline the proposed exemption for Reptilia, at least until the changes are studied by expert specialists (i.e., scientists) to provide a more detailed account of the immediate and long-term environmental consequences of the proposed amendments.

Thank you for your consideration of my comments.

Brendon Samuels  
Chair, Environmental Stewardship and Action Community Advisory Committee