

## Comments on draft Goldfish in Natural Areas brochure

May 3, 2023

Prepared by the City of London Environmental Stewardship and Action (ESACAC)

1. **Background context:** The pamphlet was originally designed for distribution at local businesses that sell goldfish and/or koi (points of sale). The primary purpose of this education pamphlet is to ensure people who intend to purchase goldfish understand the long-term implications for them, their chosen pet and the environment. This targeted education will help reduce the number of pet fish that are ultimately dumped or flushed into natural areas and contribute to invasive species problems. The secondary purpose of this pamphlet is to provide education for people who have an existing pet goldfish that they want to get rid of, many of whom will visit pet stores to seek advice from retail staff. Pet store employees generally are not able to provide information or literature about invasive species for sale, relevant bylaws concerning dumping in London, or about ethical methods to kill fish if required.
2. The latest draft of the pamphlet assumes that readers are familiar with the concept of invasive species. This may not be the case for some readers. Not providing this information could lead some to misunderstand the contents of the pamphlet. It is recommended that 1 sentence should be added to provide general information about what an invasive species is, under the section “What is the problem?”
3. ESACAC recommends including mention of koi in the pamphlet in addition to goldfish. These similar fish also pose problems as invasive species in London. It is okay to keep the focus on goldfish but you may want to include koi where discussing the problem.
4. It is recommended that the front cover of the pamphlet should include a clearer picture of a goldfish or relevant sign. It should be straightforward for the public to glance at the pamphlet without reading and immediately understand what it is about. The existing cover photo shows a goldfish sign but it is too small to read. An alternate image is available at the link below that is free for use by the City of London.

[https://drive.google.com/file/d/1fjhZWXNW38EuqlWXbMx9L0jbd2nDqAX/view?usp=share\\_link](https://drive.google.com/file/d/1fjhZWXNW38EuqlWXbMx9L0jbd2nDqAX/view?usp=share_link)  
*Goldfish sign at Westminster Ponds, photo taken by Brendon Samuels and authorized for use by the City of London*

5. Initial recommendations for this pamphlet included the following information about humane methods for euthanizing a goldfish to be provided in the FAQ section:

*If there are no alternatives, the next option may be to euthanize the fish. The Canadian Council on Animal Care (CCAC) recommends methods to kill a Goldfish quickly, painlessly and with minimal stress. These include decapitation or pithing, both of which can be technically difficult and unpleasant, or using the drug tricaine methanesulfonate, commonly referred to as TMS or MS-222, by mixing it into the water with baking soda. For more information about this, visit the link below. For information about humane methods of euthanasia, please review page 64 of the CCAC guidelines available at: [www.ccac.ca/Documents/Standards/Guidelines/Fish.pdf](http://www.ccac.ca/Documents/Standards/Guidelines/Fish.pdf)*

We were advised that City staff removed all text related to euthanasia, but no explanation was given for this change. **ESACAC believes in order for the pamphlet to be most effective at reducing harm for pet fish and wildlife, it is important to reference information about humane euthanasia for pet fish.** This text could be reduced in length and simplified:

e.g., “Unwanted pet fish may need to be euthanized. For guidance on humane ways to kill a fish, refer to the Canadian Council on Animal Care guidelines 112 and 113 for fish euthanasia. Recommended methods include tricaine methanesulfonate (TMS or MS-222) mixed with baking soda into fish water (>250 mg/L) for up to 3 hrs, and/or decapitation or pithing.”

The reason for including this information is that readers who already have a goldfish or koi that they do not wish to keep anymore will have limited convenient alternatives to dumping. While some schools and pet stores may accept unwanted fish, they generally offer very limited capacity compared to the number of unwanted pets in London. This leaves pet owners with a dilemma: they have to get rid of their fish somehow, and typically this happens as dumping. If people want to euthanize their fish, there is limited and conflicting information available online to educate them on the most humane method to use. Staff working in pet stores do not have information about how to euthanize a fish. This may lead people to adopt more harmful or less reliable methods to euthanize an unwanted fish such as improper decapitation, oxygen deprivation, flushing or neglect. Secondly, the inclusion of information about euthanasia is meant to act as a deterrent. Readers considering purchasing a fish should be given foresight of the kind of decision they may need to make down the road if they choose to purchase certain long-lived species. Some readers may be more likely to avoid choosing a goldfish for a pet if they learned about the risk they would need to perform euthanasia.

6. “You may bring a Goldfish into your home with the best intentions and then find yourself in the future with a need to find somewhere else for it to live. Goldfish are an invasive species, and bring with them a variety of problems”. This text is a bit awkward– the word ‘find’ is used twice and grammar in the second sentence seems like it could be simplified.
7. The hyperlinks at the bottom of the FAQ section are formatted incorrectly (need to be separated).
8. “Goldfish are from East Asia and do not belong in nature in North America” – missing a period at the end.
9. Based on consultation with the Upper Thames River Conservation Authority, it is recommended that the reference to African Dwarf Frogs should be removed from the suggested alternatives to goldfish in the pamphlet. In place of where the African Dwarf Frogs text is removed, we suggest including a photo of an alternative preferred type of fish, such as a betta fish or other tropical fish such as guppies.
10. What is the City’s plan for distributing these pamphlets? The following retail stores in London are believed to sell goldfish. Several have been contacted and staff gave verbal permission to distribute education pamphlets about goldfish either near their aquariums or at checkout. Brendon Samuels from ESACAC has offered to help with distributing the pamphlets to stores, if desired. Reach out to Brendon at at bsamuel2 at uwo dot ca
  - Petsmart – 1275 Highbury Ave N #117 · (519) 457-3129
  - Petsmart – 86 Fanshawe Park Rd E · (519) 672-6149
  - Petsmart – 1270 Wellington Rd C · (519) 686-7708
  - Big Al’s Aquarium Supercentres — 920 Commissioners Rd E · (519) 668-2752
  - Pet Paradise – 1080 Adelaide St N · (519) 432-1600
  - Bobby G’s Pro Aquarium — 99 Belmont Dr Unit 5 · (226) 663-2877
  - Southwest Pet — 1641 Dundas St · (519) 451-7279