The Manitoba Herpetocultural Society



Re: Winnipeg's Responsible Animal Bylaw

- 10(d) Family Boidae:
  - 43 species
  - Targeted: anacondas and boa constrictors
  - Common pets affected: rainbow boas, tree boas, dumeril boas
- 10(e) Family Pythonidae:
  - 28 species
  - Targeted: reticulated, rock, indian, & scrub pythons
  - Common pets affected: carpet pythons, green tree pythons, short-tailed pythons

- 10(g): Family Iguanidae:
  - >500 species
  - Targeted: green and other large iguanas
  - Common pets affected: spinytail iguanas, chuckwallas, desert iguanas, basilisks, collard lizards, horned lizards, spiny lizards, anoles, curly-tail lizards

- Suggested:
  - Change family Iguanidae to subfamily Iguaninae
  - Or add:
  - “except members of the family Iguanidae reaching an adult length of no greater than one (1) meter”

- 10(h): Family Teiidae:
  - >200 species
  - Targeted: large tegus
  - Common pets affected: ameivas, whiptail lizards,

- Suggested:
  - Change family Teiidae to genus Tupinambis
  - Or add:
  - “except members of the family Teiidae reaching an adult length of no greater than one (1) meter”

- The domestic dog (Canis lupus familiaris) is a subspecies of the gray wolf (Canis lupus)

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Attention: Leland Gordon & the City of Winnipeg

To whom it may concern. I was contacted by Leland Gordon to comment on the recent proposed changes to the City of Winnipeg's exotic animal by-law. I was personally very involved as an expert with the City of Ottawa's changes to it's exotic animal legislation and Mr. Gordon has asked me to comment on my involvement with Ottawa's by-law process as it was very detailed.

Ottawa spent much time working on appropriate by-law and asked for input from many experts with respect to changes to the exotic animal legislation after the amalgamation of the City. With respect to the exotic animal portion of the by-law, they utilized 5 consultants to comment on what would be considered suitable animals for the public to keep as exotic pets. The individuals were Mike Rankin, Herpetologist from the Museum of Nature, Andrew Mott, from Carleton University, PJAC, OARA (The Ottawa Amphibian and Reptile Association), and myself. Mike Rankin at the time had worked at the National Museum and the Museum of Nature for over 30 years in the animal care lab and had cared for a wide variety of reptiles and amphibians over the years. Andrew Mott had worked at Carleton University in their animal care department for over 30 years as well. PJAC, I believe everyone in this process is very familiar with. OARA is a small group of avid reptile enthusiasts; the vast majority are not breeders of reptiles but private individuals who keep individual species for their enjoyment and lastly myself.

I have been doing educational programming with reptiles and amphibians since the 1980's and my wife and I founded Little Ray's Reptile Adventure in 1995 and Little Ray's Reptile Zoo in 2000. Our zoo and outreach company travel across Canada doing educational programming supporting backyard conservation initiatives as well as responsible pet ownership within Canada. We have an extremely competent and professional set of staff of over 40 with a wide range of backgrounds including zoologists, veterinary technicians, licensed teachers, animal rehabilitation workers, childcare workers, and animal rights advocates. We regularly assist the SPCA and Humane Societies as well as municipal, provincial, and federal authorities with the placement of unwanted and confiscated exotic animals. Furthermore we regularly act as consultants to other zoos and museums including CAZA and non-CAZA accredited facilities within and outside Canada with their animal care practices and educational animal programming.

It was brought to my attention that the Ottawa By-Law was used as the primary source to follow with Winnipeg's proposed changes to the existing by-law due to the level of detail, time, and expertise put into drafting the by-law. The Ottawa by-law was indeed very thorough and well thought out. At the end of the day, there were a handful of retail business's that had to adjust their sales practices to comply with the new by-laws however I am not aware of any organization that had to close their doors do to these changes or lay off staff as a result. I also feel it is critically import that if the Ottawa by-law is to be used as the standard to follow based on the 'expertise' brought on by the City of Ottawa to consult that these experts recommendations should be mentioned in this letter as the city did not accpet all recommendations.

I feel it is pertinent that I do outline the recommendations that were made unanimously by the cities experts that were not accepted by the city. I also feel it pertinent to recognize that there are some breeders in the Ottawa Amphibian and Reptile Association and PJAC does look out for the best interest of pet stores. However, I feel it more pertinent to mention that at the time, Mike Rankin, Andrew Mott, and myself were not, or never had been breeders of reptiles for profit and non of us had anything to win or loose with respect to the animal legislation. We were simply acting as consultants/experts and there was not conflict of interest with our involvement. The following were a couple recommendations made by OARA, PJAC, Andrew Mott, Mike Rankin, and myself that were not accepted by the City of Ottawa.

1. **All non venomous species of snakes under 3 meters be allowed** – The cities experts had recommended that all snakes under 3 meters be allowed in the new by-law. This recommendation was made on the appropriateness and ease of caring for many species of pythons and boas that are over 2 meters and under 3 meters as adults. From a public safety standpoint, we considered and mentioned that no boa or python with an adult size of less then 3 meters had ever been documented causing serious harm to a person. This was not accepted by the city. They did accept non boas or pythons up to 3 meters but boas and pythons only up to 2 meters. I believe it was the perceived size based on the girth of the snake that caused council to vote against this recommendation.
2. **All tarantulas be allowed** – The consultants/experts had recommended unanimously that all tarantulas be allowed as there are not species of tarantulas venomous enough to kill a person and many make appropriate 'pets'. Ottawa's council was very close to banning all tarantulas in the end and conceded by asking for a list of 3 species so people who chose to keep a tarantula could have a choice. The consultants picked 3 species based on ease of maintenance and disposition for the council to include.
3. **Lizards up to a meter** – The consultants/experts across the board agreed that lizards over a meter for the most part are tough for many people to care for appropriately do to their size and requirement for space. I see that Winnipeg is adopting this as well but I felt it pertinent to include this point as Ottawa ended up banning all iguanas regardless of their size. I am unclear as to what happened with this point as that was not the recommendation and I did not recall any conversations about iguanas under 1 meter. We agreed that green iguanas and other large iguanas should be banned but somehow the writing of the by-law ended up including all iguanas. This was most likely an oversight on the part of the consultants/experts. In the end I do feel this changed very little with respect to

what people were allowed to keep but recognize there are some smaller species of iguanas that do make appropriate pets.

4. **Some species of scorpions** – The consultants/experts agreed that some harmless species of scorpions should be allowed. Council rejected this recommendations after asking, 'How many pet store staff in Ottawa could 100% properly identify different species of scorpions?' The consultants/experts agreed that the majority of pet store staff would most likely not be able to properly identify scorpions and considering the dangerous nature of some species we conceded that for public safety that all species should be banned.

Little Ray's Reptile Zoo in Ottawa today acts as a zoo, educational facility, and animal rescue and still today works closely with the SPCA, Humane Society, and government authorities as a resource for the placement of confiscated and unwanted exotic animals. We do not sell animals to the public for profit and have nothing to gain or loose from the passing of this by-law. With this being said, we do travel through the west and often make a stop in Winnipeg with crocodilians & very large snakes. These will be banned under this by-law and I would not recommend otherwise as any responsible exotic animal by-should ban these species. I mention this as I want to ensure the city and parties involved understand that I do not have a conflict of interest in this recommendation and I do support giant snakes and crocodilians being included in the by-law.

If the city were to consider any of my recommendations with respect to the proposed by-law I would recommend that the city reconsider changing the following;

1. Allow all non venomous species of snakes up to 3 meters and all lizards up to 1 meter as an adult and not be restrictive based on families of snakes
2. Allow for a system similar to Ottawa where organizations/people can apply for an exemption based on a set of standards set out in the by-law. I am fairly certain that Ottawa allows for CAZA accredited zoos to come into Ottawa without a permit (due to the short notice of this letter I was unable to 100% confirm this point). Non accredited facilities and individuals must apply for an exemption with the city that they do grant based on a set of standards and inspections. All costs incurred by said individual.

I am very happy to hear that people who do have animals that are in violation of this proposed new by-law will have the opportunity to grand father the animals they have regardless of the species. Furthermore, I do appreciate the challenges and frustrations for all parties involved when a city tries to implement exotic animal legislation that is fair and equitable for the people who choose to keep non traditional pets while looking out for the best interest of the animals welfare and the city as a whole. I appreciate Mr. Gordon asking for my expertise on this issue and the Ottawa by-law. Please let me know if I can be of further assistance to the City with respect to this issue. Best of luck.

Paul Goulet
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Jan 31st 2013

children's museum

To whom it may concern,

Over the last year and a half the Children's Museum has hosted Prairie Exotics many times and we have always been impressed with the level of service we have received.

Prairie Exotics offers interactive learning with animals. They have given educational demonstrations of exotics animals during our special programming at the museum where guests came to learn about these animals. These events have had wonderful feedback about Prairie Exotics and the enjoyment of our guests being able to watch, learn about or even hold some of these animals. Over the course of the summer we had a temporary gallery regarding unique animals and Prairie Exotics was willing to share their Bearded Dragon to enhance the gallery.

Having these animals at the museum with knowledgeable hosts help our guests to learn about exotic animals and have an experience our guests would not normally be able to have. Prairie Exotics provides a unique service with a variety of exotic animals most people will never see. The Children's Museum highly supports what Prairie Exotics is trying to achieve with his animals and we hope they will continue their work.

Luke Cecelon
Program Coordinator
Children's Museum
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DEPARTMENT OF BIOLOGY

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09 July, 2013

Memo to: Councillor Fielding, Chairperson
Councillor Eadie
Councillor Smith
Councillor Steen
His Worship Mayor Katz

From: Robert Anderson, PhD
University of Winnipeg

Re: SCHEDULE "A" TO THE RESPONSIBLE PET OWNERSHIP BY-LAW, LIST OF PROHIBITED ANIMALS (Section 36)

I would like to make a few comments to the EPC with respect to the current form of this bylaw making its way through the city council deliberation process. I am a biologist and teach a number of courses in that subject area at the University of Winnipeg. I have also been a reptile owner on and off for many years and find them interesting and educational pets, as do my children. I am also not a resident of Winnipeg so am not particularly affected by the city bylaw, but I think I may be able to contribute something useful to the discussion.

I would like to make 3 points related to the issues of public safety, responsible pet ownership and the use of scientific nomenclature (naming) for clarity in discussions of animal species.

Public Safety:

Reptiles, similar to many groups of other animals and plants include some species of obvious danger to their owners and to others and those species should be regulated. The current version and wording of the bylaw is useful with respect to venomous species of snakes and lizards, although some fine tuning should be attempted with respect to correct scientific names at appropriate levels of classification to encompass all of the groups of venomous reptiles. Some are missing and the wording of the bylaw would be more useful with respect to enforcement and clarity for collectors if it were more precise. On the other hand, some of the listed non-venomous reptiles for restriction or banning raise questions of why they should be banned as they pose no obvious danger and in

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some cases make excellent pets and educational resources. A usual basis of legislation is that it should be structured to be fair, or applicable to all people equally. From that precept, reptile owners should reasonably be able to ask why some species of non-dangerous reptiles are apparently being banned for sale and or collection in Winnipeg when they account for essentially no significant visits to hospital emergency rooms and yet people in general, and children in specific very often show up at ER's for treatment of dog bites and cat scratches and yet those animals are not banned as pets. Quantitative consideration of actual risk of harm to the public of most non-venomous reptiles would place this group of pets well behind cats and dogs, yet they should be viewed the same way from the perspective of fairness. Dr. Nancy McQuade's letter to council specifically refers to "intolerable" public risk from reptiles and yet she is not an ER physician and includes no data to back up her personal opinion on the issue.

Responsible Pet Ownership

Many species of non-venomous reptiles do make excellent pets because they require little space and no outside exposure as long as they are well fed and kept clean. There are species of lizard, specifically in the genus *Ameiva* which are small and innocuous, and yet would be banned under the current bylaw because they fall within the same family as the Tegu lizards (Family Teiidae). This is not rational. Even the Tegu lizards pose no particular danger to experienced collectors. Larger cousins of the Teiidae in the family Varanidae (some of the species of monitor lizards such as the Komodo Dragon and the Nile monitor) shouldn't be held outside of zoo collections or universities for obvious reasons but banning entire groups of non-venomous reptiles, irrespective of particular biology, serves no useful purpose and potentially creates unnecessary enforcement costs. This is particularly true of the snakes within the genus *Boa* or the genus *Python*. Some species within both of these genera get quite large and might be considered a challenge with respect to husbandry, but there are also some species that stay small and are no real danger because they also are docile and easy to handle. It would be better to operate at the species level with respect to compiling a list of prohibited animals or perhaps a list of acceptable animals based on actual records of visits by people to emergency medical practitioners. The Manitoba Herpetocultural Society is an excellent resource for discussions of technical designations of species of concern with respect to this bylaw.

Of equal significance under the topic of responsible pet ownership is the idea that sourcing reptile pets should be exclusively from captive breeding programs so that the market for wild-caught, and potentially endangered species be reduced as much as is possible.

Scientific Nomenclature

I would like to stress, as a scientist, that if designations of regulated species be used for identification purposes, that only correct scientific names be used for the sake of precision and that reference be made to the International Commission of Zoological Nomenclature (ICZN) as the body with authority in respect of scientific names. Common names for organisms, for example, those names often used by amateur enthusiasts for all

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sorts of pet animals to designate colour types, or variants that grow to different sizes because of selective breeding in captivity are of no use in bylaws as common names are not precise, there is no agreed upon scheme for assigning them as there is by the ICZN for scientific names. Often, the same common names are used by different people for very different organisms and sometimes different common names are used for the same species by different people, thus these designators are really of no use in a bylaw that purports to regulate some species of animals and not others.

Different breeds of dogs and cats and almost every species of domesticated animals are subject to enormous variation in size and behavior which affect their suitability as pets. Reptiles, even within a single species, and certainly within a genus or family which are larger, more inclusive groupings are no different. Selective breeding has produced size variants of some species of snakes within the genera *Boa* and *Python* where the smaller variants that breed true for that characteristic pose no obvious danger and so shouldn't be banned if size itself is a legitimate, logical predictor of risk. This reinforces the notion that precision in designating regulated reptiles is paramount so as not to remove some species of useful and educational and harmless reptiles from the list of animals available to collectors and pet owners. Experts are excellent information resources in this respect.

I hope this submission has been useful in your deliberations.

With Best Regards,

Robert Anderson



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