PIJAC CANADA

The voice of the Canadian pet industry

La voix de l'industrie des animaux de compagnie au Canada

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RESPONSIBLE PET OWNERSHIP AND ANIMAL WELFARE IS EVERYONE'S BUSINESS!

There are undeniably essential and crucial elements to be considered when revising such an important, emotional, and impactful bylaw. To fully satisfy your electorate, your petpopulation, and your businesses, you need to consult them all. Here are some key points to include in your deliberation.

- ✓ **Over the last several months, the city administration on three different occasions, consulted with more than 20 different organizations ranging from pet industry experts, activists, businesses, NGO's, government organizations and medical experts. Outreach also included email invitations to 205 subscribers, email invitations to 37 organizations, four posts over four weeks on Facebook with 31,800 followers, four posts over four weeks on Twitter with 107,000 followers, all highlighting the survey. And finally, the city of Winnipeg public engagement newsletter with over 5,300 recipients was also included in two different editions. For an outstanding result of 6,356 constituents taking part in the survey.**

- ✓ **In January, The Netherlands Court of Justice's (Tribunal) rejected the 2015 Positive Lists for Mammals and now this decision throws into question the legality of the Positive List as published in 2017 that took 37 years to publish.**
    - **In this scenario, the Positive List was instituted by the government on the advice of the Positive List Advisory Committee based on findings of the Positive List Expert Committee (EPC). The Court stated in the ruling that while the advice provided by these committees must comply with legal requirements of professionalism, independence, and transparency, these were lacking. The Positive List Expert Committee consisting mainly of stakeholders and animal rights organizations, was not deemed independent by the Court. It was also very relevant to the Court that the research underlying the advice was based on unverifiable sources or extracted out of context from the scientific literature.**

- ✓ **A positive list will drive ownership underground and detour purchases from regulated sources. Illegal ownership does nothing to protect animal welfare because sick animals may be denied medical attention. We recommend maintaining a prohibited list. It has worked well in Winnipeg for close to a decade.**

- ✓ **We believe in the evolution of pet care and working with all industry experts including pet owners, breeders, legislators, and the medical field to achieve the best practices at any given time. PIJAC provides leadership and communication between all sectors of the pet industry through resources, training, and representation to promote the highest level of pet care. With this, we support a provincial and federal jurisdiction of laws regarding the care, importation, and retail standards. As stated by CAZA in 2014 after the adoption of an FCM resolution, those responsibilities should be adopted by other levels of government not within the municipalities.**

PIJAC Canada is a leader in leading the way in the development of policies, resources and best practices that benefit pets, families, and animal businesses in Canada. As pet owners and as an industry, we have a responsibility to ensure that the animals in our care are treated with kindness and respect, and that pets do not cause environmental or human health problems. PIJAC Canada is a pioneer in developing educational programs for animal professionals, related industries and government organizations that address these issues.

We ask that Council members vote in favor of having the Exotic Pet section of the RPO removed from the recommendations.

Christine Carrière
President and CEO

Canada Loves Specialty Pets

Animal welfare is everyone's business! ™



The Voice of Canada's Pet Industry

PIJAC CANADA

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Background

Pet ownership in Canada has steadily grown over the last 20 years, and for over three decades the Pet Industry Joint Advisory Council of Canada (PIJAC Canada) has been working with business and government agencies, at all levels, to advance the well-being of pets in Canada.





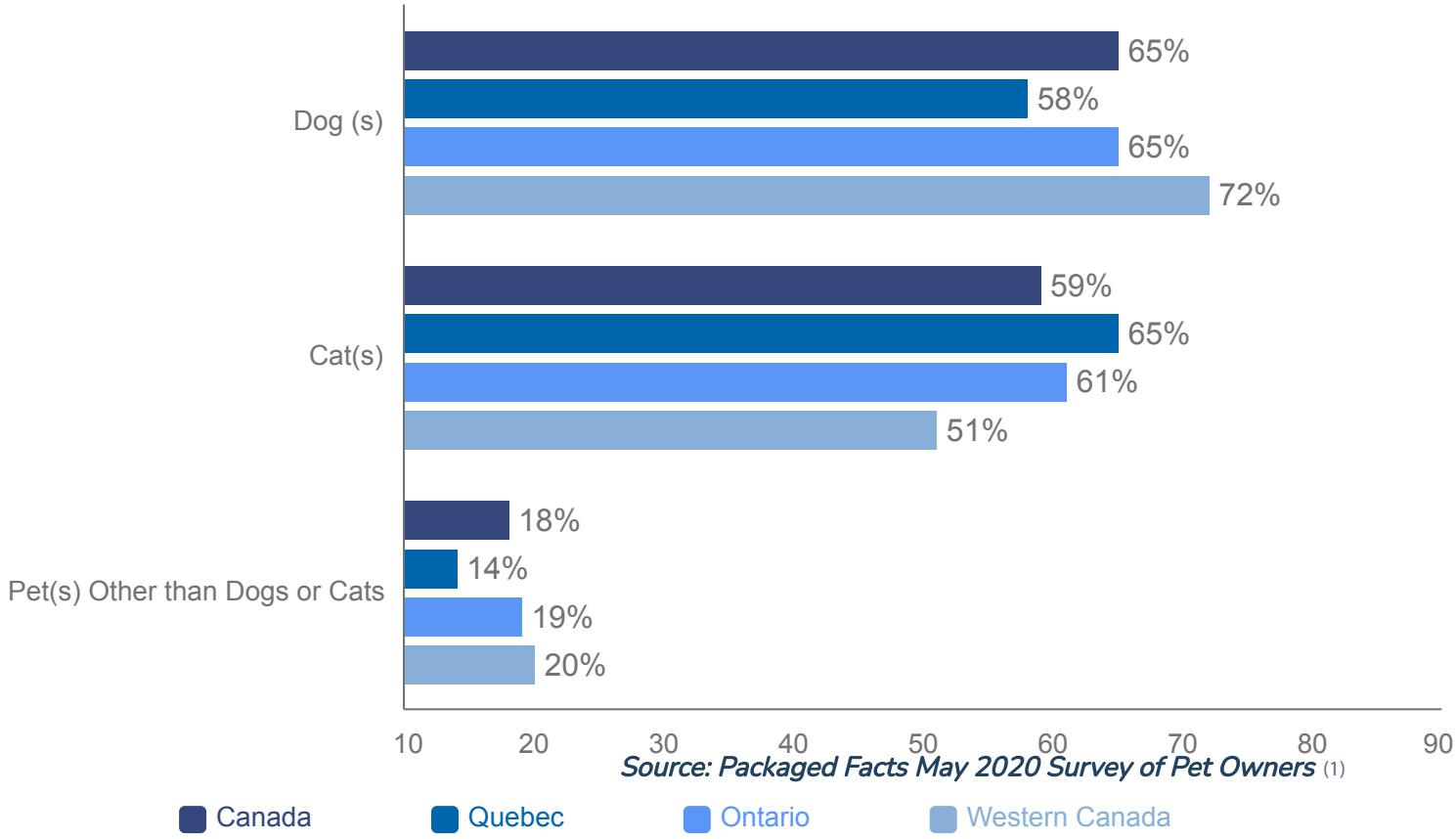
Educating members of the pet industry is a top priority for PIJAC Canada. Numerous pet retailers recognize that the success and even survival of their businesses rests on their ability to offer customers high quality service and expertise in such areas as animal husbandry, speciality pet ownership, and customer satisfaction. PIJAC Canada supports the pet industry's efforts, in this regard, by providing pet resource materials and information on a range of different species which they, in turn, can pass on to their clientele.

Pet Ownership Trends

ARE ON THE RISE!

Canadian Pet Ownership

Pet Ownership Rates: Dogs, Cats, and Other Pets by Region or Province--- Quebec, Ontario, and Western Canada, 2020 (percent of pet owners)



Source: Packaged Facts May 2020 Survey of Pet Owners (1)

Pet ownership in Canada is becoming increasingly popular. Pre-pandemic figures place pets in 63 percent of Canadian homes, which amounts to nearly 28 million pets sharing their lives with humans. Now, when most people think of pets they generally think of cats or dogs, but many Canadians also own what is classified as speciality pets.

As a matter of fact, of the 28 million pets currently living in Canadians' homes, 45 percent are actually speciality pets which includes species of birds, reptiles, amphibians, fish and small mammals (guinea pigs, rabbits, hamsters etc.). (2)

Canada's pet industry adds over $9 billion to the nation's economy



Whether it's a cat or dog, or a speciality pet, there are many reasons a person selects a specific, or different type of pet, be it for companionship, interest or general appreciation of the species.

Speciality pet lovers are a devoted and growing group in the area of pet ownership.

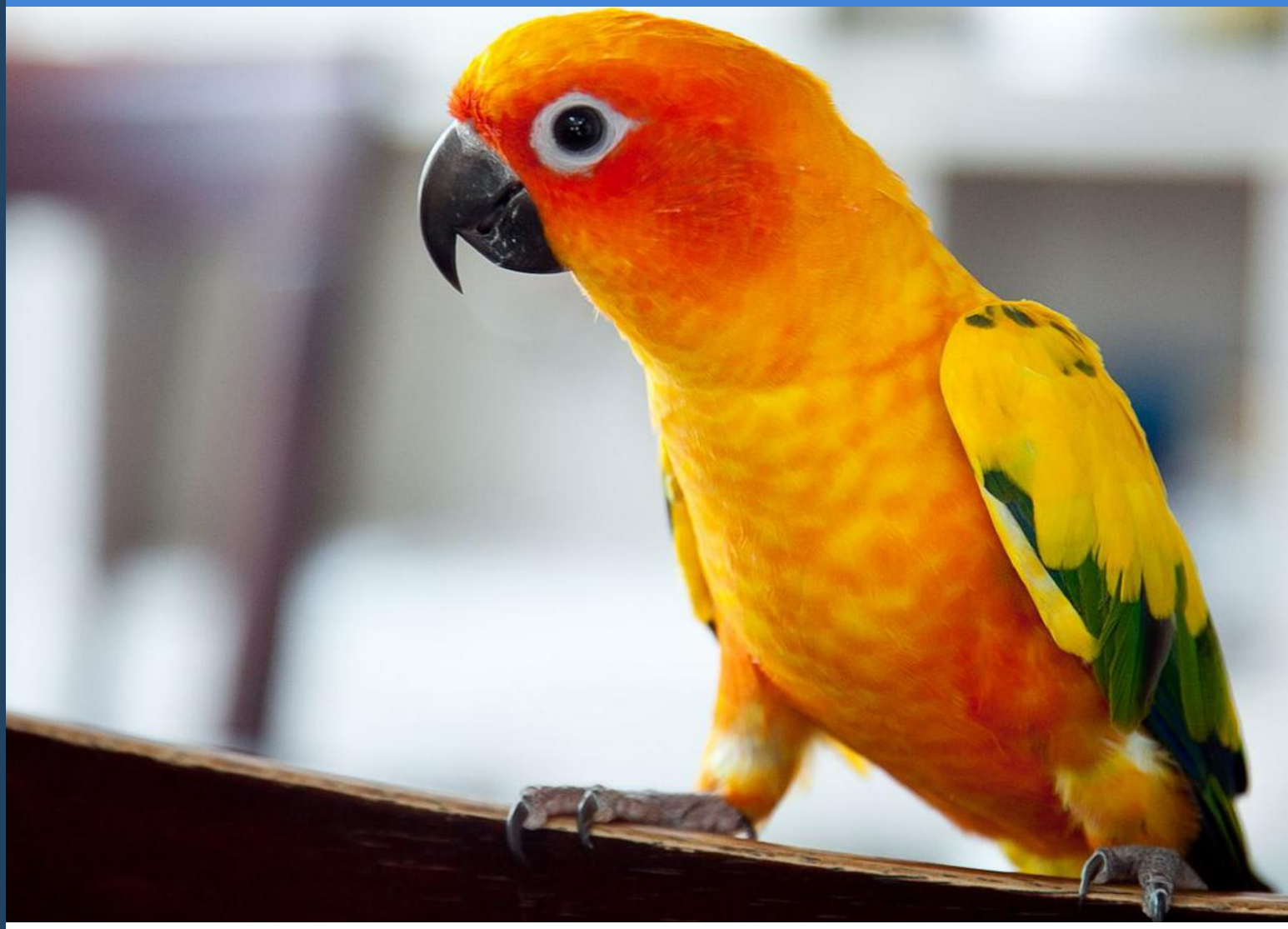
This is reflected by the fact that pet retailers across North America are seeing a notable increase in demand for these types of pets. The latest data, coming from the USA, notes a seven percent increase in families adding a reptile to their home.

While such data has not been tracked in Canada, pet retailers here say they are seeing an increased demand for such pets as well.

Western Canadian pet lovers lead the way in owning the highest number of specialty pets in Canada today.

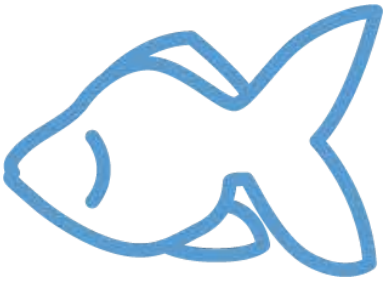
Eighteen percent of the households in Canada have a pet, other than a dog or a cat, which translates in over 1.6 million households in the country owning a speciality pet.

What Are Specialty Pets?



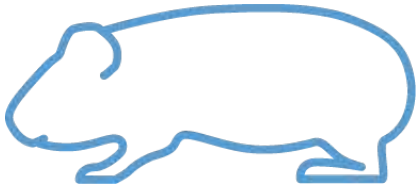
When you think of some of these specialty pets you might be visualizing “exotic species”, but there is a big difference between the two.

Exotic animals often are not all that exotic at all. They are just any animal that would require a different type of care than required for customary household animals.



Exotic Animal Policy

Since 1992, PIJAC has made available to various government agencies its own Exotic Animal Policy that includes a Prohibited Species list which identifies animals that we view as not suitable to be sold as pets.



Type of Animal*	Prohibited Examples*	Exceptions
Artiodactylous ungulates (hooved)	Deer, Giraffe, Elk, Gazelle, etc.	Domestic Goats, Sheep, Cattle
Canidae (canine)	Wolf, Coyote, Dingo, etc.	Domestic Dog
Crocodilians	Alligator, Crocodile, Cayman, etc.	None
Edentates	Anteater, Sloth, Armadillo	None
Elephantidae (elephants)	African and Indian Elephant	None
Erinacidae	Spiny Hedgehog, Moonrat, etc.	African Pigmy Hedgehog
Felidae (felines)	Lions, Tigers, Cheetahs, Pumas, etc.	Domestic Cat
Hyaenidae (hyenas)	Hyenas	None
Marsupials	Koala, Kangaroo, Opossum, etc.	None
Mustelidae (musk glands)	Skunk, Weasel, Badger, etc.	Domestic Ferret
Non-human primates	Gorilla, Monkey, Chimpanzee, etc.	None
Pinnipeds (sea mammals)	Seal, Sea Lion, Walrus, etc.	None
Perissodactylous ungulate (hooved)	Zebra, Rhinoceros, Tapir	Domestic horse and ass
Procyonidae	Raccoon, Coati, Cacomistle	None
Pteropodidae (bats)	Bats (all species)	None
Raptors (birds of prey)	Eagle, Hawk, Owl, etc.	None
Ratites (flightless birds)	Ostrich, Emu, Rhea, etc.	None
Ursidae (bears)	Polar, Black, Grizzly, etc.	None
Venomous Reptiles	Rattle Snake, Coral Snake, etc.	None
Viverridae	Mongoose, Civit, Genets	None

**** Examples of animals of a particular prohibited group are given, but they are examples only and should not be construed as limiting the generality of the group.***

Through resources such as our Exotic Animal Policy and a wide network of animal experts, PIJAC Canada has been a trusted source for members of the pet industry, with a reputation for collaboration and commitment to animal welfare. We stand by our motto that 'Animal welfare is everyone's business'™ which guides our organization and its over 1,500 members.

What Is Captive Breeding?



Specialty pets born under human care is part of how they are ethically sourced. It involves the rearing of animals born and raised in a controlled environment designed to support and monitor the health of the animals, as well as ensure preservation of the species.

Through this approach, pet retailers are able to provide their customers with pets that are healthier, easier to handle and much friendlier towards their prospective owners. This helps maximize the chances of a successful pet-owner relationship and benefits everybody: the animal, the pet owner and the retailer.

Today, there's an increasing variety of human raised (captive bred) animals available to Canadian pet owners. The birds and small mammals available to pet retailers almost exclusively come from captive breeding facilities and the number is increasing every year. The benefits of captive breeding for the purposes of pet ownership in the area of specialty pets are legion.

Human raised animals make better pets. Because they are hand-raised they are better suited to life as a pet. As human raised animals are subject to a variety of veterinary protocols, they are free of certain diseases and parasites commonly found in their wild counterparts. Over the last two decades, the focus has shifted towards well-known, multi-generational captive-bred species as they are healthier, well socialized and more relaxed.



Percentage of Human Raised Speciality Pets Sold in Pet Stores



Small Animals	100%
Pet Birds	95%
Reptiles and Amphibians	75%
Freshwater Fish	95%
Marine (Saltwater) Fish	20%

Over 90 percent of speciality pets such as birds, small animals and fish sold in Canadian pet stores come from captive breeding programs either from abroad or here in Canada. While favouring local sources, some of the demand requires importing species from captive-breeding facilities in other countries.

These same pet retailers have received training, through PIJAC Canada, in how to implement their own animal care and husbandry protocols to help them identify issues like the threat of zoonosis, (disease that can be spread from animals to people) for example. Pet store operators are also in the front lines identifying and working only with ethical suppliers of speciality pets.



In addition, captive breeding programs usually don't take animals from the wild; they contribute to species preservation and help ensure genetic diversity. In rare cases, wild specimens remain part of the equation while breeding techniques are developed and refined.

That being said, breakthroughs in captive breeding programs often appear through small, devoted hobbyists and allow pet retailers to market human raised animals exclusively, advance captive breeding research and innovation.

International conventions such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora CITES, and closer to home, federal regulations such as WAPPRIITA, the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act, recognize the importance of well-established structured captive breeding programs.

Why 'Allowable' Pets Lists Can't Work



There's a movement afoot to change pet classification models from PIJAC Canada's recommended prohibited species list to permitted species lists. Here's why this change in approach can't work.

The call for the use of permitted species' lists aimed at limiting exotic species, as opposed to animals that can be kept as speciality pets, is a disproportionate approach. Given that there are no identified issues of concern regarding the species our industry currently imports, PIJAC Canada maintains that species should only be restricted where it can be properly demonstrated, based on a scientific risk assessment, that they constitute some form of risk.

We also believe that educating people to select the right pet for their lifestyle and care for it properly is the key to happy and healthy pets and owners, not limiting species through 'permitted species' lists.



4 FACTORS

Make Allowable Lists Unworkable

1. How will the list of criteria be determined and respected?

When developing a permitted species list criteria would have to be determined that would allow, rather than disallow which type of animals would be included in the list. This would require a very long and complex set of criteria based on numerous facts or assumptions. Whereas the prohibited criteria developed as part of PIJAC Canada's Exotic Animal Policy provides a very simple and succinct criteria.

For example, with reptiles, PIJAC's Exotic Animal Policy sets out regulations related to how animals should be prohibited related to their size using its three-metre/two-metre
rule, which is defined as follows: "An adult snake's length cannot exceed three metres and an adult lizard's length cannot exceed two metres (snout to the tip of the tail)."

"Any animal that would require a standard of care and control greater than required for a customary household."





Easy To Apply Rules

This rule because is easy to apply and enforce through the simple use of a measuring tape. This is another reason that a prohibited species list is more feasible than a permitted one, because the more species that are added to a permitted species list, the more training of enforcement officers will be required to properly identify them. Relying on identification, only, can be problematic because, with age, an animal's colour patterns may change. There are also agrowing number of colours available to herpetoculturists (captive reptile breeders) such as hypomenalistic species such as albinos, and granite and calico patterns.

English Common Name	Species	*Length
Green anaconda	Eunectes murinus	3m >
Yellow anaconda	Eunectes notaeus	3m >
Reticulated python	Python reticulatus	3m >
African rock python	Python sebae	3m >
Burmese python	Python molurus bivittatus	3m >
Indian python	Python molurus molurus	3m >
Amethyst python	Morelia amethystina	3m >

Prohibited Species

As a complement to this approach, PIJAC Canada has identified six different species and, one sub-species of snakes that should be prohibited as pets. All of them exceed three meters and are recognized for their unsuitability and risk to human health and the environment.

They are all members of the Family Boidae (constrictors, e.g. boa, anaconda) and we recommend their inclusion on a prohibited species list, with a statement such as: 'These six species and this one sub-species, members of the Boidae Family are prohibited'.

*Length suggested in literature. Snakes grow during their entire life and the total length they may reach is greatly influenced by the captive conditions in which they are kept. As for the two-meter rule in lizards, it eliminates all the unsuitable specimens, as well as those that are of real threat to pet owners.



4 FACTORS

Make Allowable Lists Unworkable

2. Difficulty in Application and Management

Provided that an agreement could be reached on the list of criteria that must be met, it is likely that the number of proposed speciality pet species, that do not meet the list's criteria, would be far smaller than those that do. The result would be a list tens of thousands of animals that are permitted.

Such a list would prove to be a nightmare for those charged with administering and enforcing it. Those individuals would need to be extremely well versed in each species on the list, requiring in-depth training and education which adds to departmental budgets. Another key factor to consider is that, while a large part of the list would be comprised of established species, the list would require constant modification, due to changes in consumer demand, market trends, and availability of new species and other factors.

Keeping the list current would prove to be totally unfeasible. For example, Newfoundland has a list which permits only a small number of finch species to be sold as pets when, in reality, that number of finch species available to the pet trade is exponentially higher. Such list modifications would be lengthy and often out-dated by the time they would be put in place. This situation would create frustration among bird hobbyists and risks driving them to black market breeding operations.

Prohibited Species lists are much shorter and easier to maintain and administer. References to the list can be accessed more quickly and controlled. The size of the list, itself, makes it much easier for cross-referencing by common and scientific names. By way of example, the Dutch courts annulled that country's permitted species list on the grounds of a lack of expertise in advising such a list!

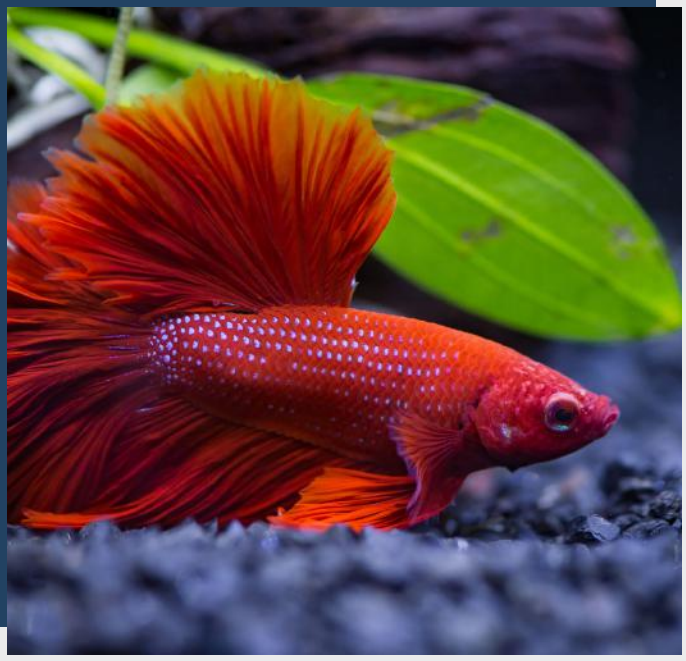


4
FACTORS
Make
Allowable Lists
Unworkable

3. Restrictions on Trade

Opting for a permitted species list will make it difficult to introduce new permitted species to the local pet trade. One has only to mention the domestic ferret (not found in the Newfoundland list), the African pigmy hedgehog and the degu rodent as examples.

All three species, while they meet the list of criteria for speciality pets (human raised, easily kept in captivity) they are comparatively new to Canada's pet stores but have been widely available elsewhere in the pet trade for years.



The omission of any permitted species on the list would put unfair and unjust trade restrictions on pet wholesalers and retailers. It would also be a direct contradiction to the acceptance of the "what is already being traded" criteria. Such situations do not occur with the use of a 'prohibited species' list.

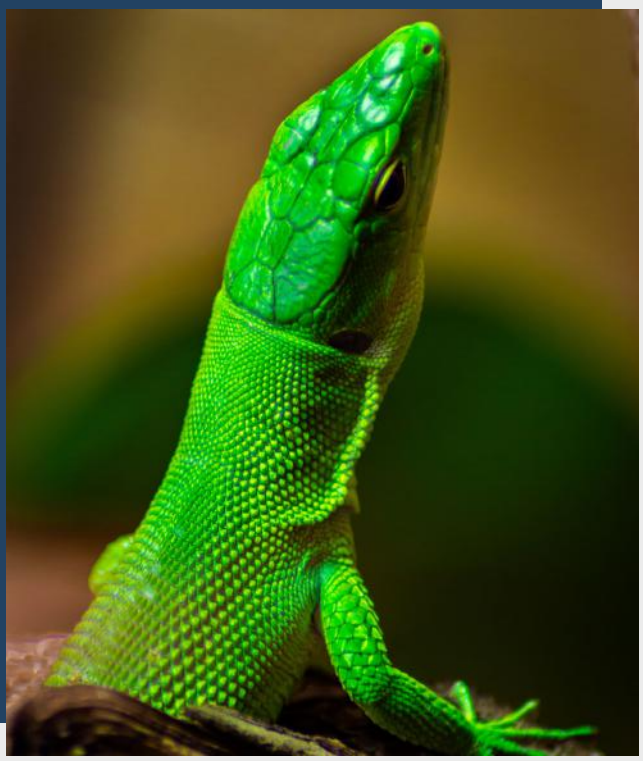




4
FACTORS
Make
Allowable Lists
Unworkable

4. Will not stop people from keeping banned pets

Furthermore, evidence demonstrates that such a move would do little to stop people from keeping banned pets but, rather, drive ownership underground. This also does nothing to protect animal welfare, because sick animals may be denied veterinary attention if they are kept illegally. We saw this when many reptiles were discovered in Swedish homes after the country joined the EU and its ban on reptile ownership was lifted.



Another example is when Norway lifted its extensive 40-year ban on the ownership of most species of reptiles. The Norwegian Government had to acknowledge there was more than 100,000 reptiles in private ownership, indicating a flourishing and long-term black-market trade.

How is Canada's pet trade regulated?



Perhaps one of the most frustrating thing about a forced shift towards the permitted list approach is that it is wholly unnecessary. There are many laws already in place in Canada and internationally that protect both animals and people as it relates to "speciality pets" and "exotic animals".

Animals in Canada are protected under two official layers of legislation, federally and provincially. These, like all of our laws, evolve over time, but their primary focus is on protecting animals from cruelty by mandating that they receive the necessities of life for them to be healthy and comfortable.

Global animal protection is also alive and well. Animals that may be brought into the country are protected by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), an international agreement between governments aimed at ensuring that international trade in specimens of animals and plants does not threaten the survival of the species.

Regulations for Importation of Animals into Canada



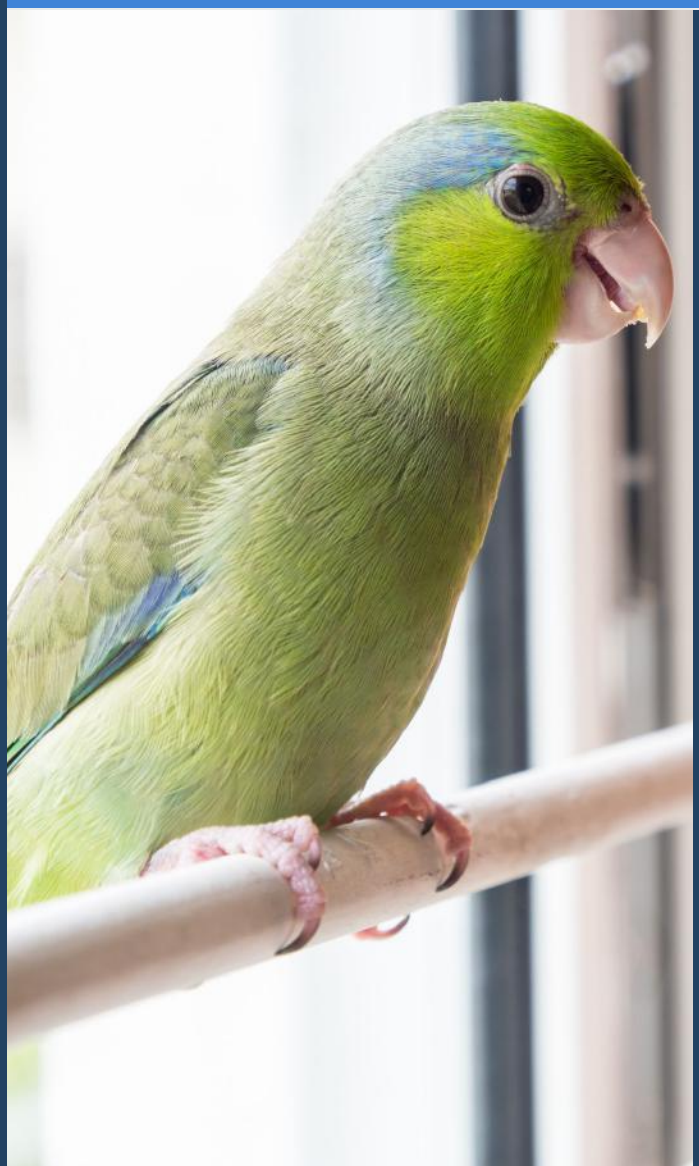
CITES Regulations

Appendix 1 – Animals that are not allowed to be imported into Canada

Appendix 2 – Animals that are allowed to be imported or exported, with a permit*

Note: This Convention is there to regulate, not to prohibit trade

*The Canadian Wildlife Services (under Environment and Climate Change Canada) issues the import permit, and the Canadian Food Inspection Agency (CFIA) verifies the health of the animal at the point of entry into Canada.



Bird or Reptile Imports

Commercial shipments of birds and reptiles are required to undergo quarantine. CFIA offers quarantine facilities or importers can host the quarantine at their own facility under the scrutiny of CFIA. Border inspections by CFIA veterinarians ensure the animal meets all health requirements and approves.

Fish Imports

Commercial fish imports are kept in quarantine by the importer under the guidance of the National Aquatic Animal Health Program operated by CFIA.

Regulations For INTERPROVINCIAL TRANSPORT OF ANIMALS

'Listed' and regulated animals are overseen by WAPPARIITA, the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act. It includes:

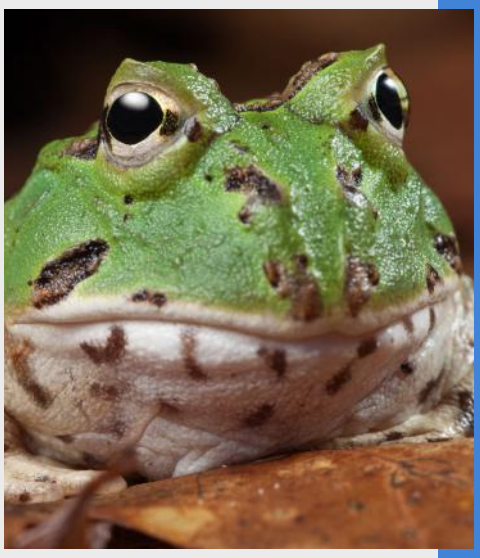
- Species on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) control list.
- Foreign species whose capture, possession, and export are prohibited or regulated by laws in their country of origin.
- Canadian species whose capture, possession, and transportation are regulated by provincial or territorial laws.
- Species whose introduction into Canadian ecosystems could endanger Canadian species

The Act forbids the import, export and interprovincial transportation of these species, unless the specimens are accompanied by the appropriate documents (licencses, permits).



Just as laws will differ from province to province, so will municipal laws, however, the spirit of each one is the same to protect the animals in our care.

PIJAC Canada supports all laws that protect animals against harm and provide for their needs including the physical and mental well-being. PIJAC Canada wholeheartedly supports animal welfare, including the research, which leads to the advancement of the animal welfare laws. However, we do not agree with the animal rights doctrines that mandate that animals should no longer be allowed as pets.



Animal Welfare

Animal Welfare as defined by the World Organization for Animal Health (OIE) states that: “Animal welfare means how an animal is coping with the conditions in which it lives. An animal is in a good state of welfare if (as indicated by scientific evidence) is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering any pain, fear or distress.

Animal welfare means disease prevention and veterinary treatment, appropriate shelter, management and nutrition.

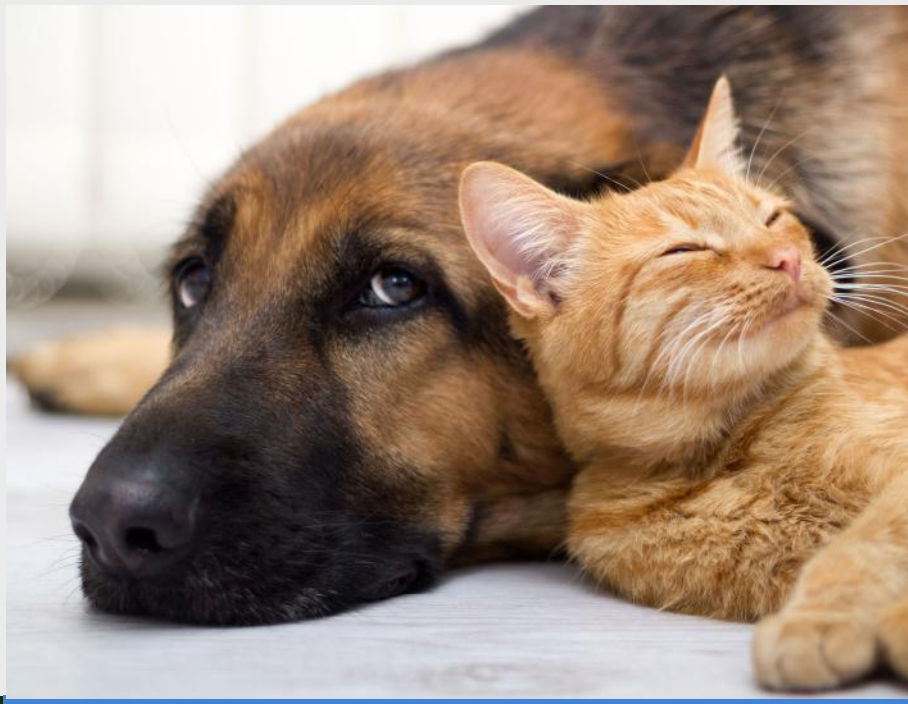


Animal Rights

Whereas Animal Rights is a philosophical perspective that proposes animals should have the same rights as humans. Meaning that animals should not be viewed as property and used for human purposes and—in the extreme sense—should not be kept as pets.

Why Canadians LOVE PETS!

While Canada's pet industry adds billions to the national economy, what pets offer Canadians is worth so much more. You'd be hard pressed to find someone whose life has not been positively touched by an animal be it a dog or cat, or a gecko or guinea pig.





As a source of comfort and companionship, it has been scientifically proven that pets contribute physical and mental health well-being of those who care for them. A study commissioned by The Human Animal Bond Research Institute about the health care cost savings of ownership is startling in that it found pet ownership saves health care costs of more than $11 trillion globally each year.

Given this trend, it was not surprising to see a rise in people bringing pets into their lives as we bore the brunt of the pandemic. One of the most beautiful things about pets, regardless of species, is the joy they bring to their human families and what these families will do to love their companions and ensure they are happy and healthy. Anecdotally, in the past 30 years we've witnessed a exponential rise in available nutritional options and environmental enhancements for Canada's specialty pets. As we learn more, we do more, which is also the case in human care. Specialty pets may make up a smaller percentage of animals in homes in comparison to dogs and cats, but they are loved and cared for just as much.

Why Collaboration Beats OVER REGULATION

For millennium, humans have shared their lives with a wide variety of species, from dogs and cats to goldfish and geckos. That's why indiscriminate and broad ranging bans on speciality pets via the use of a permitted species list would have a significant negative and unfair impact on Canada's responsible pet owners.

Live animals in the pet trade have moved between countries successfully for decades under a heavily regulated and continuously evaluated system that protects both human and animal health. Research illustrates that pet companionship improves human health and mental well being and brings a direct connection with nature right into our homes for us and our children in an increasingly urbanised world.

Such contact helps people develop greater compassion for animals, and a better understanding of the natural world, while making significant contributions to our national economy. Whether it be a mainstream pet like a dog or cat, or a specialized species such as tropical fish, snakes and spiders; pet keepers and the pet care community that brings them together readily acknowledge the need to source and care for these companions responsibly and legally.



PIJAC Canada has always believed in collaboration over confrontation and that there is value in debate. The well being of the animals that we care for is what drives our organization. If, however, you want to look at it strictly from a dollar and cent perspective, without a supply of health animals, for any type of legitimate pet-related business, there is no pet industry. This means that doing what's best and always working to raise the bar on the welfare of animals is in best interest of the pet sector. Over the last three decades PIJAC CANADA has worked with countless federal and provincial agencies to assist them in their work. Beyond that, we have also worked with humane societies, animal rescue agencies, SPCA's, pounds and all types of businesses, throughout Canada, to assist where we can. This has to be a collaborative discussion based on traceable, independent, scientific findings.

REFERENCES



01

PIJAC Canada Exotic Animal Policy*

02

Canadian Pet Survey

03

HABRI Report

04

Canada Wild Species Protection

05

CITES Regulations

06

OIE International Health Standards

(1) Packaged Facts: Canadian Pet Market Survey - 2021
(2) Euromonitor International: Pet Care in Canada - 2020 (*In the case of Euromonitor International they estimate the number of individual fish, whereas Packaged Facts, counts homes with one or more aquariums as a single unit.)*
*PIJAC Canada's Exotic Animal Policy is a living document which is reviewed regularly, and updates are ongoing.