

April 4th, 2023

sent via email

Hon. Graydon Smith
Minister for Natural Resources and
Forestry
Whitney Block, 99 Wellesley St W,
Toronto, ON M7A 1W3

Hon. Michael Kerzner
Solicitor General
George Drew Bldg 18th Flr,
25 Grosvenor St,
Toronto, ON M7A 1Y6

Re: Addressing risks to the public, officers and municipalities arising from the current approach to regulating the keeping and care of exotic animals

Dear Ministers Smith and Kerzner:

I am writing on behalf of [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#) to indicate our support for the ongoing work of World Animal Protection and other likeminded stakeholders advocating for Provincial regulation of exotic animals and the related issue of “roadside zoos”.

AMCTO represents excellence in local government management and leadership. With over 2,100 municipal managers and professionals (e.g., CAOs, Clerks, Treasurers and Management) members covering all of Ontario’s municipalities, we are Ontario’s largest voluntary association of local government professionals and are recognized as an influential voice on key management and legislative issues affecting the sector.

For 85 years, AMCTO has maintained a productive relationship with government by helping ensure the professional expertise and local understanding of our members is utilized to improve existing and/or new legislation, policy and programs.

In 2011, AMCTO wrote to the Ministers of Natural Resources and Community Safety and Correctional Services requesting Provincial action to address the risks to the public, enforcement officials and municipalities arising from the current approach to regulating the keeping and care of exotic animals.

Since then, municipalities in Ontario have continued to face challenges in managing unregulated exotic animals and the presence of “roadside zoos” which have posed safety risks to the public and to enforcement officers.

While the Province introduced the Provincial Animal Welfare Services Act, 2019 (PAWS) and accompanying regulations, World Animal Protection's analysis of the regulations is that it is not working with standards that are vague and difficult to prosecute.

Most recently, in July 2021, there was an incident at a roadside zoo in Hastings Highlands where a tiger in captivity was killed and eaten by lions who escaped their enclosure nearby. The operator owned "roadside zoos" in Township of Wainfleet and Municipality of Lambton Shores. Many "roadside zoos" do not have the proper safety implements or training to manage exotic and wild animals. The mobile nature of these "zoos" means that if one municipality manages to remove them, they can pick up and move to another quite easily.

Ontario is the last major jurisdiction in Canada without a licensing regime or restrictions for the keeping or use of exotic animals in captivity. The absence of effective Provincial regulation, guidance and resources means municipalities must manage regulation and enforcement through bylaws resulting in different regulatory and enforcement regimes across the province without adequate training and resources, resulting in an administrative burden to municipal staff.

More importantly, the existing regulatory approach to the keeping and care of exotic animals is leaving the public and municipal law enforcement officers at physical risk and municipalities at legal risk and bearing the administrative and financial burden of enforcement.

AMCTO strongly encourages the Province to develop and implement a mandatory licensing program for all facilities, businesses, organizations and private citizens that house native wild or exotic animals, phasing out those situations that pose a danger to public health and safety. AMCTO recognizes that municipalities may need to continue to play a role which will require additional Provincial support. In addition, bans on acquisition and breeding should be put in place preferably through a "positive list" mechanism.

We hope that the Province will act on these recommendations as soon as possible and in a way that reduces the regulatory, administrative, and enforcement burden on municipalities.

Please reach out to Executive Director, David Arbuckle (darbuckle@amcto.com) should you have any questions or if you wish to discuss the issue further.

Sincerely,



Elana Arthurs, CMO, AOMC
President, AMCTO

Cc: Hon. Steve Clark, Minister of Municipal Affairs and Housing
Monique Rolf von den Baumen-Clark, Deputy Minister, Ministry of Natural Resources and Forestry
Mario Di Tommaso, Deputy Solicitor General, Community Safety
Kate-Manson Smith, Deputy Minister, Ministry of Municipal Affairs and Housing
Christine Hogarth, Parliamentary Assistant to the Solicitor General
Colin Best, President, Association of Municipalities of Ontario
Doug Godfrey, President, Municipal Law Enforcement Officers Association
Melissa Matlow, Campaign Director, World Animal Protection
Michèle Hamers, Wildlife Campaign Manager, World Animal Protection