

## Janzen, Heather

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**Subject:** FW: Email - Communication - Kaitlyn Mitchell - Animal Justice Canada - Proposed Amendments to The Animal Control Bylaw, 1999 - CK 151-15  
**Attachments:** 2023 01 05 Letter to Saskatoon City Council.pdf

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**From:** Web NoReply <[web-noreply@Saskatoon.ca](mailto:web-noreply@Saskatoon.ca)>

**Sent:** Thursday, January 5, 2023 10:26 AM

**To:** City Council <[City.Council@Saskatoon.ca](mailto:City.Council@Saskatoon.ca)>

**Subject:** Email - Communication - Kaitlyn Mitchell - Animal Justice Canada - Proposed Amendments to The Animal Control Bylaw, 1999 - CK 151-15

--- Replies to this email will go to [kmitchell@animaljustice.ca](mailto:kmitchell@animaljustice.ca) ---

Submitted on Thursday, January 5, 2023 - 10:26

Submitted by user: [REDACTED]

Submitted values are:

**I have read and understand the above statements.:** Yes

**Date:** Wednesday, January 04, 2023

**To:** His Worship the Mayor and Members of City Council

**Pronouns:** She/her/hers

**First Name:** Kaitlyn

**Last Name:** Mitchell

**Email:** [kmitchell@animaljustice.ca](mailto:kmitchell@animaljustice.ca)

**Address:** 5700-100 King St W

**City:** Toronto

**Province:** Ontario

**Postal Code:** M5X 1C7

**Name of the organization or agency you are representing (if applicable):** Animal Justice

**What do you wish to do ?:** Submit Comments

**What meeting do you wish to speak/submit comments ? (if known)::** City Council Meeting

**What agenda item do you wish to comment on ?:** Proposed Amendments to The Animal Control Bylaw, 1999

**Comments:**

Please find enclosed comments submitted on behalf of Animal Justice, World Animal Protection, and Zoocheck regarding proposed amendments to Bylaw No. 7860, The Animal Control Bylaw, 1999 as approved by the Standing Policy Committee on Planning, Development and Community Services.

**Attachments:**

- [2023 01 05 Letter to Saskatoon City Council.pdf](#)406.75 KB

**Will you be submitting a video to be vetted prior to council meeting?:** No



January 5, 2023

Mayor Charlie Clark  
Office of the Mayor  
222 - 3rd Avenue North  
Saskatoon SK S7K 0J5

Saskatoon City Council  
222 - 3rd Avenue North  
Saskatoon SK S7K 0J5

*Via email*

Dear Mayor & City Councillors,

**Re: Proposed Amendments to The Animal Control Bylaw, 1999**

I write on behalf of national animal protection organizations Animal Justice Canada, Zoocheck, and World Animal Protection regarding proposed amendments to Saskatoon's Animal Control Bylaw, 1999, as approved by the Standing Policy Committee on Planning, Development and Community Services and City Council, that would allow the keeping of 12 species of boa constrictors and pythons in Saskatoon. The proposed amendments themselves are to be tabled before City Council at its January, 2023 meeting.

The Report presented to the Standing Committee indicates that the purpose of the proposed amendments is to align the Bylaw "with provincial regulations for allowed species". The other objectives listed in the Report appear to pertain only to amendments proposed to the Dangerous Animals Bylaw. Appendix 1 of the report goes on to provide the purported justification for the amendments, noting that the province recently amended its Captive Wildlife Allowed Species List and that four species of boas and eight species of pythons are now allowed to be kept in captivity in Saskatchewan. It states further that Administration has since "received inquiries and requests from the public to consider changing local bylaws...on ownership of pythons and boas."

The Report does not mention that the province's allowable snakes list was heavily influenced by pet reptile keepers. The Report also does not mention any of the animal welfare implications associated with this proposal. For the reasons set out below, we urge you not to approve the Bylaw amendments. At the very least, further analysis and debate are needed before such a policy decision with such significant implications for the health and wellbeing of animals is made.

## The Exotic Pet Trade

More than 1.4 million exotic animals are kept as pets in Canada, with more than 82,000 of those kept in Manitoba and Saskatchewan.<sup>1</sup> The global demand for exotic pets is a major driver of the legal and illegal global wildlife trade. Even where animals are bred in captivity, there can be significant animal welfare and environmental concerns associated with their breeding, transport, and keeping once they reach consumers.

Scientific understanding of the cognitive, emotional, and social capabilities of wild animals commonly kept as pets is rapidly evolving, and shows clearly that many of these animals' basic needs cannot be met in captivity.<sup>2</sup> Scientific evidence also shows the important ecological roles that many exotic animals play in nature, yet the global pet industry is responsible for the capture of millions of wild animals each year, making it a key threat to many species' survival.<sup>3</sup> This is one of the main reasons that all python and boa species are listed under the Convention on International Trade in Endangered Species of Wild Fauna and Flora.<sup>4</sup>

Ownership of exotic animals is an issue that is of increasing concern to the Canadian public, whose sensibilities and values have shifted in recent decades. A recent Nanos Research poll shows that 67% of Winnipeg residents are opposed to capturing, breeding and trading wild animals for the exotic pet industry.<sup>5</sup> We do not have data regarding Saskatonians' views on this issue, but given that there has been little to no public debate on the proposed amendments – with the only voices heard thus far apparently coming from individuals who wish to keep and breed boas and pythons in their homes – further public education and engagement is warranted before the proposed amendments are approved.

In addition to risks to animal and environmental health and wellbeing, the exotic pet trade also poses important public health and safety risks.<sup>6</sup> Approximately 75% of new or emerging infectious diseases in humans originate from animals, principally from wildlife. A significant percentage of zoonotic diseases in humans have been linked to exotic pets, with pet snakes in particular associated with risks of bacterial infections in humans such that the CDC, Public Health Agency of Canada, and other medical organizations recommend that households with children under five should not have pet reptiles including snakes.<sup>7</sup>

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<sup>1</sup> <https://www.worldanimalprotection.ca/our-work/animals-wild/wildlife-not-pets>.

<sup>2</sup> See, e.g. Warwick et al, "Exotic pet suitability: Understanding some problems and using a labeling system to aid animal welfare, environment, and consumer protection" *Journal of Veterinary Behavior* Vol 26 (July-August 2018) 17. Online: <https://www.sciencedirect.com/science/article/pii/S1558787818300364>.

<sup>3</sup> See, e.g. <https://theconversation.com/trading-in-extinction-how-the-pet-trade-is-killing-off-many-animal-species-71571>.

<sup>4</sup> <https://cites.org/eng/app/appendices.php>

<sup>5</sup> December 2021 Nanos polling of Winnipeggers, statistical representation of the City of Winnipeg, commissioned by World Animal Protection.

<sup>6</sup> See, e.g. Chomel et al, "Wildlife, Exotic Pets, and Emerging Zoonoses" *Emerg Infect Dis* V13(1) (Jan 2007) 6. Online: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2725831/>.

<sup>7</sup> See, e.g. Warwick et al., "A review of captive exotic animal-linked zoonoses" *Journal of Environmental Health Research* Vol 12(1). Online: [https://emergentdisease.org/assets/documents/A\\_review\\_of\\_captive\\_exotic\\_animal-linked\\_zoonoses.pdf](https://emergentdisease.org/assets/documents/A_review_of_captive_exotic_animal-linked_zoonoses.pdf). See also: <https://iacuc.wsu.edu/zoonoses-associated-with-reptiles-amphibians/>.

## Boas and Pythons

With respect, the question of whether to allow pythons and boas to be kept in private homes should be based not only on the desire of individuals to keep these animals, but on whether the animals at issue are well-suited to life in captivity in a private residence. Exotic animals should not be kept in captivity unless their biological, social, psychological, and welfare needs can be met. Other relevant considerations include risks exotic animals pose to public health and safety, environmental risks to native wildlife when exotic animals escape or are released into the wild, associated nuisance issues, and use of public funds for oversight and regulation. Unfortunately, the species of boas and pythons at issue are not well-suited to life as a pet.<sup>8</sup>

Pythons and boas are fascinating animals. But whether born in captivity or captured from the wild, the fact remains that they are wild animals who have evolved over millions of years for life in their native habitats. Scientific evidence shows that reptiles, including many snakes, have advanced cognitive, emotional, and social capabilities.<sup>9</sup> They suffer physically and psychologically in restrictive environments, such as small aquariums and plastic containers which often do not even allow them to fully stretch out their bodies, never mind satisfy their specific and complex biological and behavioural needs.<sup>10</sup>

Though pet retailers and breeders market many boas and pythons as “starter pets”, who are “easy” to keep for beginners, the sad reality is that despite their human guardians’ best intentions, these animals are not well suited to life in captivity in private homes. The Regina Humane Society, for instance, opposes the breeding and keeping of exotic or wild animals as companion animals, as well as the importation and commercial trade in exotic or wild animals destined for the pet market.<sup>11</sup>

Ball pythons are one example of an animal commonly sold and bred in the pet industry that is not well suited to life in private homes. In the last 20 years Canada has imported more than 78,000 ball pythons — a complex, nocturnal snake species from the grasslands and forests of Africa.<sup>12</sup> Most are doomed to spend their lives in small containers in bedrooms and basements, unable to engage in natural behaviours such as climbing and burrowing. Artificial breeding in captivity can even cause ball pythons to suffer from serious genetic defects. Yet Saskatoon is considering allowing these and seven other species of pythons to be kept in the city

As noted above, the province’s list of allowed snakes was heavily influenced by pet reptile keepers and the pet industry. Before deciding whether to allow new exotic animals to be kept in Saskatoon, we encourage the City to do its own independent assessment. The following considerations are particularly relevant:

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<sup>8</sup> See, e.g. <https://emodepetscore.com>.

<sup>9</sup> See, e.g. <https://www.youtube.com/playlist?list=PLf43RWry7WcmXwV7ndwVZTsBI7nZPgacD>.

<sup>10</sup> Clifford Warwick et al. “Getting it Straight: Accommodating Rectilinear Behavior in Captive Snakes-A Review of Recommendations and Their Evidence Base” (May 2021, Animals): DOI:[10.3390/ani11051459](https://doi.org/10.3390/ani11051459).

<sup>11</sup> See: <https://reginahumanesociety.ca/about-us/about-the-rhs/position-statements/wildlife-exotics-companion-animals/>.

<sup>12</sup> World Animal Protection, “Suffering in silence: Uncovering the cruelty off the global trade in Ball pythons”: [https://dkt6rvnu67rqj.cloudfront.net/cdn/ff/QyZJDp0JdmZlmKJ85pyfEm43YYk5Q8My6CTXQDwQ4Y8/1584719737/public/media/WAP\\_Ball\\_Python\\_Campaign\\_Report\\_FINAL\\_030820LR\\_Canada.pdf](https://dkt6rvnu67rqj.cloudfront.net/cdn/ff/QyZJDp0JdmZlmKJ85pyfEm43YYk5Q8My6CTXQDwQ4Y8/1584719737/public/media/WAP_Ball_Python_Campaign_Report_FINAL_030820LR_Canada.pdf).

- Safety to humans – limiting animals that pose risks due to size, aggression, toxicity, or zoonotic diseases.
- Safety to local wildlife – limiting animals that may be invasive or spread disease if they escape or are abandoned or intentionally released into the wild.
- Space requirements – limiting large animals or animals with large natural home ranges.
- Social needs – limiting animals that require large social groups for their wellbeing.
- Origin – limiting animals that are taken from the wild.
- Sleep behaviour – limiting nocturnal animals not normally active in daytime.

The risks are particularly high given Saskatoon’s lack of restrictions on the number of exotic animals that can be kept in a given household, leaving the door open to unregulated breeders and collectors housing dozens or even hundreds of reptiles within city limits.<sup>13</sup> If Saskatoon decides to allow residents to keep pythons and boas as pets, at the very least it should limit the number of such animals that can be kept in a given residence.

### **Conclusion**

A desire on the part of certain individuals to keep pythons and boas in their homes is no justification for allowing the keeping of these wild animals in private homes in the City of Saskatoon. At the very least, we request that Council conduct a thorough, science-based assessment of the animal welfare implications of this proposal rather than approving the amendments solely because these animals are allowed to be kept elsewhere in the province. We would welcome the opportunity to provide further information and to assist the City with such a review.

Yours truly,



Kaitlyn Mitchell  
Staff lawyer, Animal Justice Canada  
Email: kmitchell@animaljustice.ca

On behalf of:  
Animal Justice Canada  
World Animal Protection  
Zoocheck

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<sup>13</sup> See, e.g. <https://edmonton.ctvnews.ca/nearly-700-reptiles-killed-in-south-edmonton-house-fire-city-1.5664459>.