



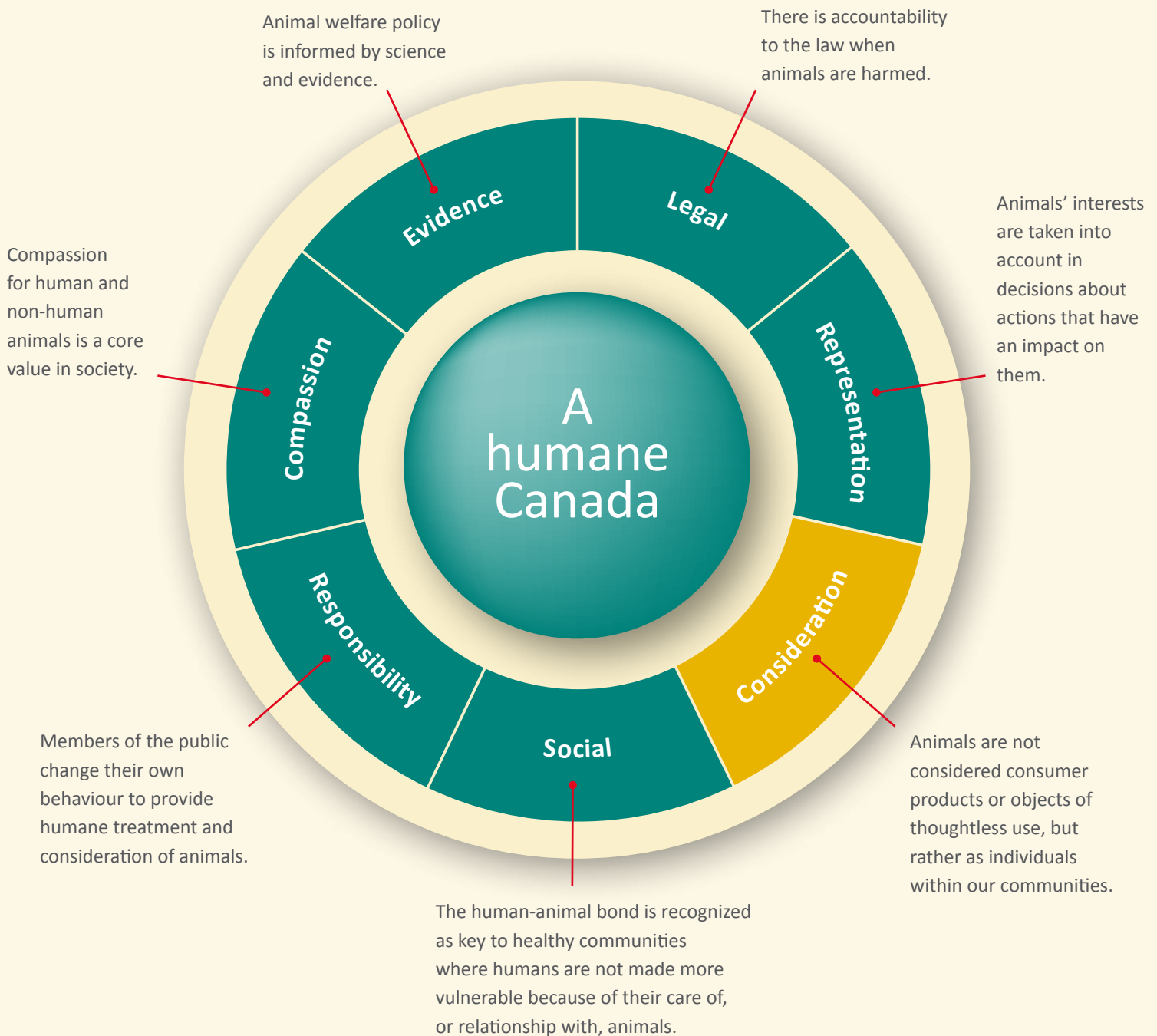
# INCLUDING ANIMALS AS INDIVIDUALS WITHIN OUR COMMUNITIES

INDICATORS OF A HUMANE CANADA:  
THE CONSIDERATION KEYSTONE



# THE KEYSTONES OF A HUMANE CANADA

*Measuring Progress Toward a Humane Canada* Canada lays out a framework that recognizes seven different keystones, or foundations, of a humane Canada. Within each keystone there are enabling conditions— aspects that make it possible for the keystone to be achieved. Indicators have been identified that can be used to measure and infer progress for each enabling condition. For more information on the full project, please visit: [humanecanada.ca/indicators](https://humanecanada.ca/indicators). Humane Canada has set out to measure each keystone in turn, focusing in this report on the Consideration Keystone. Each of the eleven indicators below is listed under the enabling condition it measures. Please note that some enabling conditions have more than one indicator.







## Indicators of a Humane Canada: The Consideration Keystone












How do we know whether Canada is humane, or whether we are even making progress as a country toward becoming more humane? Answering these questions requires measuring and tracking indicators that inform us about attitudes toward animals,<sup>1</sup> how they are treated, and how they are situated within Canadian social and political structures.


Identifying a list of such indicators is exactly what Humane Canada set out to do, as described in *Measuring Progress Toward a Humane Canada*. That report laid out a framework and cast a vision of what a humane country could look like. It presented over 40 indicators that can be tracked to infer progress toward that goal.


In this report, we assess the current status of indicators of the Consideration Keystone, looking at how animals are considered within various Canadian practices and institutions. In our society, there is an expectation that we treat one another with respect and dignity. In a humane country, likewise, there is an understanding that each animal has a life worthy of respect and dignity; they are not considered as consumer products or objects of thoughtless use, but rather as individuals within our communities. Ethical considerations guide our legislation and decision-making about animal use. Where we do not have direct responsibility for care, we nonetheless have a responsibility to respect the needs and interests of animals, and the law restricts us from harming them for exploitative purposes.

<sup>1</sup> Throughout this report, the term “animals” refers to non-human animals.

## Consideration keystone indicators and their current status

INDICATOR		STATUS
C <sub>1</sub>	Laws in Canada include requirements for ethical, responsible breeding of pets	
C <sub>2</sub>	Percentage of animal shelter population that is juvenile	
C <sub>3</sub>	Number of provinces that require animal dissection as a curriculum learning objective	
C <sub>4</sub>	Number of school boards with policies allowing student choice to opt out of dissections	
C <sub>5</sub>	Number of animals experiencing moderate or severe distress and pain in studies for the regulatory testing of products	
C <sub>6</sub>	Strategic priorities of federal funding agencies include alternatives to animal methods	
C <sub>7</sub>	Hunting, trapping, and fishing regulations promote ethical practices	
C <sub>8</sub>	Number of wildlife rehabilitation centres/sanctuaries	
C <sub>9</sub>	Number of fur farms	
C <sub>10</sub>	Number of zoos, mobile zoos, aquaria, circuses, and rodeos	
C <sub>11</sub>	Number of exotic pets kept in Canadian households	

 Good/Trending in the right direction

 Fair/More needed

 Poor





#### ENABLING CONDITION

*Companion animals are bred in an ethical and controlled fashion, avoiding the birth of more animals than homes that can be provided, allowing only traits that promote good health and welfare and that serve the animals in their actual lifestyles and environments.*

### Indicator C<sub>1</sub>

#### Laws addressing ethical, responsible breeding of pets

***Finding: Laws addressing ethical breeding practices are lacking across the country. Harmonized regulations and licensing systems with legally mandated codes of practice are needed to protect animal welfare.***

Over half of Canadians have at least one pet,<sup>2</sup> and one third of Canadians brought a new pet into their homes since the beginning of the COVID-19 pandemic, including many who had never had one before.<sup>3</sup> Cats and dogs continue to be the most popular pets and are treasured because of the many ways they enrich our lives, through their unconditional love, companionship, and zest for life. We recognize the important ways pets contribute to our well-being; in return, we must provide for their welfare. At a fundamental level, our well-being and theirs are inextricably linked.

Rather than viewing companion animals as products for human use or as commercial inputs to be bred for profit, we must, above all, consider them as individuals deserving of dignity, respect, and care, promoting their good health, welfare, socialization, and behaviour. This creates the conditions for animals to be successfully integrated into families for a long, healthy, fulfilling life and supports strong human-animal bonds, which enrich our communities.

<sup>2</sup> Canadian Animal Health Institute (2023). "2022—Latest Canadian Pet Population Figures Released". Available at: <https://www.cahi-icsa.ca/fr/press-releases/2022-latest-canadian-pet-population-figures-released>.

<sup>3</sup> Pet Valu Canada Inc. (2022) "National Survey of Canadian Pet Owners Reveals an Estimated 3 Million Pets Joined Canadian Homes During the Pandemic." Available at: <https://www.newswire.ca/news-releases/national-survey-of-canadian-pet-owners-reveals-an-estimated-3-million-pets-joined-canadian-homes-during-the-pandemic-889445509.html>

In a humane country, companion animals are bred in an ethical and controlled fashion, avoiding the birth of more animals than homes that can be provided while allowing only traits that promote good health and welfare and that serve the animals in their actual lifestyles and environments.

Since breeding and providing for animals and their young involves special requirements and can involve complications, it is important that those engaging in breeding be educated and conscientious to provide appropriate care in a suitable setting. Breeding as a for-profit pursuit raises concerns about the possibility of animal welfare standards being sacrificed in favour of increased revenue. Commercial breeding operations, such as puppy and kitten mills, often present substandard health and environmental conditions, as well as substandard care, treatment, and breeding practices. Furthermore, they may also neglect to provide appropriate socialization and opportunities to meet other behavioural needs, which ultimately leads to serious health and welfare issues. In some cases, these issues include genetic defects or hereditary disorders. The result may be a pet who is prone to physical and mental health issues throughout their life, resulting in their family dealing with high veterinary and emotional costs. Such operations are able to thrive due to a lack of adequate regulation and oversight. Regulatory systems need to ensure appropriate standards of care are upheld.

At the national level, there are few legislative tools for promoting ethical, responsible breeding. The *Animal Pedigree Act* sets out requirements for the business operations pertaining to breeding, such as the registration and identification of animals, but it does not provide animal welfare protections. Under the *Health of Animals Act* and *Regulations*, the Canadian Food Inspection Agency (CFIA) oversees the import of animals to prevent injury and suffering during transport and for disease prevention and control. There is currently little control over the breeding and rearing conditions for animals whose offspring are being imported, nor are breeding practices regulated once animals are in Canada.

The Canadian Kennel Club maintains a Code of Ethics, Codes of Practice, bylaws, rules, regulations, as well as policies and procedures to which its some 20,000 member dog breeders are expected to adhere, though these are not requirements at law. The only federal protections that apply are the general animal cruelty provisions of the *Criminal Code*.

Provincial laws on breeding vary across the country. In all provinces, the general provisions against animal abuse in the respective animal welfare legislation apply, though not all of these laws address the special context of breeding. In three provinces (Alberta, Nova Scotia, and Ontario) there are no provincial regulations on breeding, nor is there recognition of required or acceptable breeding practices. Two other provinces (British Columbia and Saskatchewan) also lack specific regulations on breeding, though the animal protection legislation in these provinces makes reference to codes of practice (“codes”) published by the Canadian Veterinary Medical Association (CVMA) on the operation of catteries and kennels to define acceptable standards of care. In Prince Edward Island and Newfoundland and Labrador, the CVMA codes are also included in the provincial legislation. In these provinces, abiding by the CVMA codes is legally mandated. The final three provinces (Manitoba, New Brunswick, and Quebec) each introduce a provincially mandated permit or licensing system, and each takes their own approach regarding whether or how they reference the CVMA codes of practice. In Quebec, there is no reference to the codes, but a permit is required to keep fifteen or more animals older than six months of age. In New Brunswick, dog kennels must be licensed, which requires an initial inspection, and must operate in accordance with the CVMA code. However, there are no regulations for catteries. Finally, in Manitoba, any location with five or more female dogs or cats who are capable of reproducing must be licensed and adhere to the relevant CVMA code. To protect animal welfare, a clear and consistent set of regulations and licensing requirements should be established across the country with legally required compliance with codes.





Many of the provinces do not regulate breeding in any capacity, leaving an inconsistent landscape of breeding requirements and regulatory gaps across the country. In some cases, municipal governments attempt to fill these gaps by regulating breeding with the use of bylaws. However, municipalities have fewer enforcement tools and resources than higher levels of government and may have challenges with effectively enforcing these bylaws. A common challenge with the regulation of breeding is that there is no regular inspection process; rather, inspections might occur only on the basis of complaints. However, as breeding operations take place in private settings, complaints are unlikely to be filed. One avenue to address this is regulating the sale of animals and requiring documentation, recognizing that fraud may be another obstacle.

Clear requirements for ethical, responsible breeding through a harmonized system at a higher level of oversight, such as provincial or federal systems, are needed for the protection of animal welfare. It is essential that such requirements address traits that harm an animal's quality of life, such as traits that make it difficult to see, breathe, and move normally, or to give birth naturally. The CVMA code of practice for kennels addresses such issues. In addition, licensing and inspections are important elements to ensure those requirements are being met and that breeders are upholding high standards of animal welfare.



## Indicator C<sub>2</sub>

### Juvenile animals in shelters

***Finding: In 2021, more than half of cats and more than a quarter of dogs surrendered to shelters were juvenile, representing a drastic increase relative to recent years. Oversight is needed to ensure responsible breeding and minimize the number of animals who are being bred without homes available for them to go to.***

Breeding companion animals responsibly includes only producing litters who will have a home. The presence of unwanted juvenile animals, in particular, is a clear sign that too many companion animals are being bred for sale or by accident.

The size of the animal shelter population in Canada is a direct indicator of the number of homeless companion animals. Humane Canada has been tracking the number of cats and dogs admitted to shelters operated by Canadian SPCAs and humane societies for some thirty years. These figures are detailed in our annual Animal Shelter Statistics report.<sup>4</sup> The average number of animals taken in by shelters has been steadily declining in Canada since 2011, and the juvenile proportion had been stable or trending downward until the COVID-19 pandemic. In 2021, the most recent year for which the animal shelter statistics are available, 53% of cats and 26% of dogs taken in by shelters were juvenile. This represents a dramatic increase compared to pre-pandemic levels, in which the juvenile fraction was 33% for cats and 16% for dogs.

The events arising as a result of pandemic-related lockdowns and associated isolation and stress, sadly, seem to have resulted in a steep sudden increase in the demand for pets that may have fuelled poor breeding practices and impulse buying, followed by a subsequent rise in relinquishment. In 2022, surrendered animals with significant medical and behavioural issues were overrepresented in shelters compared to past years. Therefore, unwanted juveniles in shelters could indicate pets being acquired on impulse and subsequently surrendered, as well as medical and behavioural issues arising from irresponsible breeding to increase supply rapidly, ultimately resulting in animals ill suited for companionship. Delivery of spay/neuter surgeries was also impacted by lockdowns, both for owned animals as well as in the context of Trap-Neuter-Return (TNR) programs that serve to ethically manage populations of unowned cats. In addition to restoring TNR programs and providing access to sterilization procedures for owned animals, oversight measures to ensure responsible breeding (see Indicator C1 above) are crucial to minimize the number of animals who are being bred without having homes available to care for them.

4 Humane Canada, "Annual Animal Shelter Statistics." Available at: <https://humanecanada.ca/our-work/focus-areas/companion-animals/canadian-animal-shelter-statistics/>



## ENABLING CONDITION

Non-animal alternatives to dissection are used in primary, secondary, and higher education.

## Indicator C<sub>3</sub>

### Animal dissection in schools

**Finding:** No provincial curriculum specifically requires animal dissection, although all ten permit it. One province allows animal dissection only if alternatives are unable to meet learning objectives. Only three provinces expressly recognize a student's choice to pursue non-animal alternatives to dissection.

Summary of approaches to dissection in provincial curricula

PROVINCE	DISSECTION IS A PROSCRIBED PRACTICE	NON-ANIMAL METHODS ARE RECOGNIZED AS ALTERNATIVES TO DISSECTION	A STUDENT CHOICE POLICY IS ENACTED IN THE CURRICULUM	NON-ANIMAL LEARNING RESOURCES ARE IDENTIFIED IN THE CURRICULUM
Alberta	X	✓	X	X
British Columbia	X	X	X	X
Manitoba	X	✓	✓	✓
New Brunswick	X	✓	X	X
Newfoundland and Labrador	X	✓	✓	X
Nova Scotia	X	✓	X	X
Ontario	X	✓	X	X
Prince Edward Island	X	✓	✓	✓
Quebec	X	X	X	X
Saskatchewan	X	✓	X	X

Animal dissection has been viewed as a gold standard in life sciences education for many years and is firmly situated in curricula. However, modern technologies, such as videos, computer programs, simulations, and 3-D anatomy models capable of replacing dissections and eliminating the need to use animals have become more plentiful in recent years. These interactive approaches allow for repetition in learning, are less costly, and are often more engaging to students, particularly those who have an aversion to dissection for ethical or other reasons. The educational benefits of these technologies tend to be no less than those derived from traditional dissections and, in most cases, have been found to provide even greater educational benefits than dissection.<sup>5</sup> Given the wide availability of alternatives that provide higher educational value, schools should immediately move away from dissection as a standard practice, taking up non-animal alternatives to reduce systematic harms to animals, promote a culture of respect and dignity for animals in education and science, and be more inclusive of and sensitive to students who have concerns about engaging in this practice.

A review of the provincial curricula for science courses at all grade levels across Canada shows that two provinces (BC and Quebec) make no mention of dissection. While this means that dissection is not a required practice for achieving the curriculum learning objectives in those provinces, it is also not proscribed. The decision as to whether to utilize dissections or non-animal alternatives in the classroom falls to the educators.

5 Ormandy, E. et al. (2022) Animal Dissection vs. Non-Animal Teaching Methods: A Systematic Review of Pedagogical Value. The American Biology Teacher 84: 399.

Across all eight of the other Canadian provinces, dissection is addressed for secondary school science courses and is explicitly recognized and supported as an acceptable practice. However, all of these curricula also make reference to non-animal methods as alternative options to dissection. In two provinces (Manitoba and PEI) there are even links to non-animal learning resources provided within the curricula. While these eight provinces reference non-animal methods, only three (Manitoba, Newfoundland and Labrador, and PEI) expressly recognize a student choice policy stating that students who object to performing a dissection must be provided with alternative options. In the remaining five, where no student choice policy is identified, it would seem that students are required to carry out a dissection to avoid academic penalty if their instructors utilize this practice in their classrooms, unless there are student choice policies instated at the school board level or informal approaches used by individual schools or educators. While dissections continue to take place, student choice policies should be instituted in all curricula to protect students' choice to abstain from this activity and pursue non-animal alternatives.

One notable element comes from Manitoba, where there is recognition that appealing to tradition is not an acceptable justification for utilizing dissection as an educational practice. While dissection is recognized as well established, the curriculum also states that teachers must consider educational objectives and non-animal alternatives before making a choice to use animals in the classroom and dissection should only be used if available alternatives are unable to satisfy learning objectives. With the wide availability and effectiveness of non-animal alternatives to dissection, the practice is very difficult to justify under this guiding principle.



## Indicator C4

### School board policies allowing students choice regarding dissections

***Finding: School board policies allowing students to refrain from dissections are scarce. A preferred approach is for school boards to establish opt-in policies for dissections, by which students must actively consent to performing a dissection, or otherwise receive an alternative option.***

While dissection continues to be used as a tool for satisfying curriculum learning objectives across the country, as described above under Indicator C3, student choice policies are important to protect the interests of students who object to the practice. As mentioned above, three provinces (Manitoba, Newfoundland and Labrador, and PEI) have instated student choice policies within their curricula. Among the remaining seven provinces that have no provincially recognized student choice policy, it falls to each individual school board to determine whether to create such a policy for schools in their respective districts.

To get a sense for how prevalent student choice policies are among school boards whose provinces do not address the issue, we reviewed the policies for all school boards within the most populous municipality of each applicable province. As a result, we reviewed the policies of 18 school boards in total, within the following seven municipalities: Edmonton, AB; Halifax, NS; Moncton, NB; Montréal, QC; Saskatoon, SK; Toronto, ON; and Vancouver, BC. Across these 18 school boards, the only one found to have a student choice policy was the Vancouver School Board. Not only does their policy protect the interests of students who have concerns about dissection, it promotes student awareness of their choice by requiring that, in advance of a dissection, students are informed of their right to choose an alternative activity.

The student choice policy set out by the Vancouver School Board serves as a valuable example that can help shape the development of similar policies among other school boards. When designing a student choice policy, it is important that the procedure for opting out of a dissection not discourage students from exercising their choice. An example where this might be the case would be a policy that requires additional work from students, such as having a student fill out documentation and gather signatures of approval from parents/guardians or teachers. Additionally, the requirement to actively object to dissection and request an alternative learning format may be enough to discourage some students. Approaches should be implemented that promote inclusivity and diversity of perspectives, rather than creating potential penalties, barriers, or stigma for those students who may wish to abstain. If a province, school, or educator insists on using classical dissection, a more welcoming approach that also moves away from viewing this practice as the standard would be to offer simultaneously additional non-animal-based learning activities and allow students to select the activity in which they wish to participate—or to “opt-in”. In this way, students must consent to performing a dissection, rather than the opt-out model where dissection is the expectation and students must actively seek an exception.





#### ENABLING CONDITION

*Animals are no longer used in toxicological testing, and alternative methods are used instead.*

## Indicator C<sub>5</sub>

### Regulatory testing on animals

***Finding: Just over half of the approximately 150,000 animals reportedly used in regulatory testing experienced moderate to severe distress or discomfort or severe pain. The Canadian government passed legislation in 2023 to phase out testing on animals and should ensure all actions are taken to eliminate this practice as soon as possible.***

As in life sciences education, animals are used as tools by humans in other areas of science and research, including testing. Toxicity testing is a regulatory process to determine the impact of a product, device, or substance on humans, animals, or the environment, and identify any associated risks posed. Regulatory tests have historically been conducted on animals, though non-animal approaches are becoming increasingly available as alternatives to traditional animal-based methods. These rapidly advancing technologies are often more efficient, more reliable, and less costly than animal methods, and new assays are continually being validated and accepted as standards by the international regulatory community.

Canada does not have a public system for oversight of scientific activities using animals and has effectively delegated that responsibility to the Canadian Council on Animal Care (CCAC), a non-government body that has limited authority to require that organizations participate in their oversight system.<sup>6</sup> The only publicly available figures describing the extent of animal use in Canada each year are those captured by the CCAC. While organizations that receive federal funding for work involving scientific animal use must enroll in the CCAC oversight system as a funding requirement of the Canadian government, any organization that does not depend on federal funding may choose to operate free from this oversight. As a result, the numbers collected by the CCAC are an underestimate. The true extent of scientific animal use in Canada remains unknown.

The number of animals used in the regulatory testing of products in 2021, as measured by the CCAC, was 150,724.<sup>7</sup> Tests are categorized by the CCAC according to their level of invasiveness, as shown in the table below. Just over half of all animals used in regulatory testing were subject to the two highest categories of invasiveness and experienced moderate to severe distress or discomfort or severe pain.

#### Reported number of animals used in regulatory testing in 2021, by category of invasiveness

CATEGORY OF INVASIVENESS	NUMBER OF ANIMALS
B: "Experiments which cause little or no discomfort or stress"	24,350 (16%)
C: "Experiments which cause minor stress or pain of short duration"	49,731 (33%)
D: "Experiments which cause moderate to severe distress or discomfort"	28,541 (19%)
E: "Procedures which cause severe pain near, at, or above the pain tolerance threshold of unanesthetized conscious animals"	48,102 (32%)
<b>TOTAL</b>	<b>150,724 (100%)</b>

While CCAC reports that the overall number of animals used in regulatory tests has generally been decreasing since 2018 (with a slight uptick in 2021), this does not hold true for all categories of invasiveness. Category E—the most ethically concerning—has fluctuated over the years and saw a 73% increase in 2021 compared to 2020. Category D—the next most severe—has also seen higher numbers reported in 2020 and 2021 compared to 2018 and 2019.<sup>8</sup> Moreover, it is not possible to know whether the overall downward trend holds true for Canada as a whole, due to the incomplete number of organizations reporting under CCAC's oversight. In any case, there is no guarantee regulatory testing on animals will decrease without effective commitments and ongoing action toward this end.

The year 2023 saw major developments toward the elimination of animal testing. A full ban on cosmetic testing was implemented through changes to the *Food and Drugs Act*. Furthermore, amendments were made to the *Canadian Environmental Protection Act (CEPA)*, 1999, that recognize the importance of promoting the development and incorporation of alternatives in the testing and assessment of substances to replace, reduce, or refine the use of vertebrate animals. These are important landmarks in Canadian legislation. In the latter case, *CEPA* now recognizes an ethical principle of scientific animal use known as the Three Rs (replacement, reduction, and refinement) and imposes requirements on the government to achieve the goal of elimination of all toxicity testing on animals in Canada. A decline in Indicator C<sub>5</sub> in the coming years will be critical to measuring the impact of commitments and actions in this area.

<sup>6</sup> For a comprehensive review of this issue, please see Black, V., Fenton, A., and Ormandy, E. H. (2022) Protecting Canada's Lab Animals: The Need for Legislation. *Animals* 12: 770.

<sup>7</sup> Canadian Council on Animal Care (2021). CCAC Animal Data Report 2021. Available at: <https://ccac.ca/en/animals-used-in-science/animal-use-data/annual-animal-use-data-reports.html>

<sup>8</sup> Canadian Council on Animal Care (2018). CCAC Animal Data Report 2018; Canadian Council on Animal Care (2019). CCAC Animal Data Report 2019; Canadian Council on Animal Care (2020). CCAC Animal Data Report 2020. Available at: <https://ccac.ca/en/animals-used-in-science/animal-use-data/annual-animal-use-data-reports.html>

## ENABLING CONDITION

*Animals used in research are phased out through system-wide approaches to reduction and replacement. These approaches are applied throughout the research enterprise, by individual investigators, research institutions, and enabling entities that fund or publish research results.*

## Indicator C<sub>6</sub>

### Promotion of alternatives to animal use in research

***Finding: Federal funding agencies do not currently include the development and use of non-animal methods in their strategic plans, indicating that, at this level, no direction is being given to reduce and replace animal use in research and no priority is being set to incentivize alternative approaches.***

As non-animal methods are increasingly being developed and used in cosmetic and toxicity testing (as discussed above under Indicator C<sub>5</sub>), it is reasonable to expect technologies and approaches could similarly be applied to reduce and replace the use of animals in scientific research more generally.

Much animal-based research is harmful to the subjects. From the basic conditions in which they are kept, to being manipulated and bred, to being forced to undergo procedures within actual experiments, the needs and interests of the animals are not met. While some forms of animal use in research may seem more acceptable to members of the general public because of a sense it leads to better outcomes in human medicine, experts increasingly recognize animal experimentation is not a reliable predictor of human health outcomes.<sup>9</sup> An ethical approach to animal-based research may be to avoid the use of animals in any invasive research that causes suffering and to which they do not consent.

More than 3.5 million animals were reportedly used by the CCAC for research purposes in 2021, the most recent year for which data is available.<sup>10</sup> Looking at the previous few years' data provides some sense of the recent trend: from 2018 to 2020 the number of animals used increased each year from just over 3.3 million in 2018 to almost 5 million in 2020.

If animal use in science is to be phased out, a system-wide approach to replacement and reduction needs to be applied by stakeholders throughout the research enterprise, including by individual investigators, research institutions, and enabling entities, such as those that publish and fund research.

Federal funding for research in Canada is provided by three main agencies: the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council (NSERC), and the Social Sciences and Humanities Research Council (SSHRC). Funding for research involving animals generally falls under the purview of the first two. The Canadian Council on Animal Care (CCAC) is the non-governmental organization that oversees the use of animals in public academic institutions and their affiliates that receive federal funding, as well as private institutions that voluntarily participate in CCAC's certification program.

<sup>9</sup> Akhtar, A. (2015) The Flaws and Human Harms of Animal Experimentation. *Cambridge Quarterly of Healthcare Ethics* 24: 409.

<sup>10</sup> Canadian Council on Animal Care (2021). CCAC Animal Data Report 2021.

Available at: <https://ccac.ca/en/animals-used-in-science/animal-use-data/annual-animal-use-data-reports.html>



According to the *Agreement on the Administration of Agency Grants and Awards by Research Institutions*, an institution receiving funding from any of the above three federal agencies for the purpose of conducting research involving animals must maintain a CCAC Certificate of Good Animal Practice® and must comply with all CCAC standards.<sup>11</sup> The CCAC program structure requires that researchers make an effort to seek non-animal methods, but there is no clear process set out to ensure alternatives are identified and used.

Federal funding agencies have an opportunity to take a more active role in promoting non-animal methods and ensuring the replacement or reduction of animal use wherever possible. In the UK, for example, proposals for research involving animals must receive government approval and, in this process, the Secretary of State is required to ensure that no animals are used in research if there are viable non-animal alternatives available. Such an approach should be incorporated into Canadian funding agencies' review processes to allow for a more systematic identification of non-animal methods and ensure they are favoured whenever possible.

Another approach would be for funding agencies' strategic plans to recognize and promote the importance of developing and incorporating non-animal methods in research to reduce and replace animal use, similar to the direction included in Bill S-5, the *Strengthening Environmental Protection for a Healthier Canada Act*, which amended CEPA in 2023, as described above under Indicator C5. Strategic priorities could allow development of a deeper knowledge base of non-animal research approaches. It is worth noting that the development of non-animal methods should be carried out in a way that does not require extensive comparisons to animal-based approaches for validation, which could inadvertently drive up the use of animals during the search to replace their use. Currently federal funding agencies' strategic plans make no reference at all to matters involving animal welfare or to research involving animals.

Federal funding agencies should promote the development and use of non-animal methods through setting strategic priorities. Furthermore, the use of animals in research should require approval from the funding agency via an established review process that requires available alternatives be used wherever possible and integrates ethical considerations in decisions about funding animal use.

The remaining indicators in this report address wild animals. While we don't often have direct responsibility for the care of wild animals, in a humane country, there is nevertheless an ethical responsibility to respect their needs and interests, being mindful of our intentional and unintentional impacts on their resources and habitats, and not harming them for exploitative purposes. Beyond this ethical responsibility, now more than ever, there is an urgent need to acknowledge that the health and welfare of humans and animals and the integrity of our shared environment are inextricably linked. Particularly given the compounding global crises of biodiversity loss and climate change, the well-being and survival of all species on Earth—including humans—depends upon adopting a more humane and balanced approach to our impacts on wildlife.

11 Government of Canada. *Agreement on the Administration of Agency Grants and Awards by Research Institutions*, s. 4.4. Available at: [https://www.ic.gc.ca/eic/site/063.nsf/eng/h\\_56B87BE5.html](https://www.ic.gc.ca/eic/site/063.nsf/eng/h_56B87BE5.html)



#### ENABLING CONDITION

*Impacts and activities affecting wild animals are regulated, enforced, and minimized. Such activities include hunting, trapping, fishing, and those that affect habitat use and cause its degradation.*

### Indicator C<sub>7</sub>

#### Ethical hunting, trapping and fishing practices

***Finding: While some ethical practices are promoted, a number of inhumane practices are allowed in regulations, varying widely across the provinces. Significant opportunities to improve these regulations exist.***

As noted by the BC SPCA, “Hunting, trapping and fishing are traditional practices of Indigenous people for cultural, ceremonial, livelihood and other subsistence purposes, and are an integral aspect of Indigenous title, rights, and laws.”<sup>12</sup> In general, when hunting, trapping, or fishing are performed for recreation rather than subsistence, the non-essential interests of humans are placed above the more crucial interests of the animals. Where these activities are permitted for any purpose, some practices cause more suffering than others and our laws should limit them. Since these activities involve killing the animals, it is worth noting that only practices that kill an animal instantly or result in prompt, irreversible loss of consciousness leading rapidly to death and minimizing pain and suffering are considered humane.

Provincial legislation and regulations addressing wildlife often follow the approach of focusing on conservation rather than individual welfare, though there are some examples of welfare protections in the form of bans on certain types of hunting, trapping, and fishing practices. These bans apply to such areas as the

12 This sentence is taken from the BC SPCA's Position Statement on Hunting, Trapping and Fishing.  
Available at: <https://spca.bc.ca/programs-services/leaders-in-our-field/position-statements/position-statement-on-hunting/>

inhumane use of traps, killing animals who have offspring in their care, hunting with dogs, certain methods for catching and releasing fish, and the use of poison to kill wildlife. The approaches taken in these areas vary across the provinces, as outlined below.

**Traps:** The Canadian government is a signatory to the *Agreement on International Humane Trapping Standards* (AIHTS). This international treaty has resulted in a prohibition on the use on land of leg hold traps that have steel jaws. Shockingly, these traps can continue to be used in the water. The treaty has also resulted in the maintenance of a list of certified traps that must be used. These traps include (1) live traps and snares that restrain live animals by tightening a cord around their foot/leg (snares) or clamping metal bars onto their foot/leg (traps) so tightly that the animal cannot escape; and (2) killing traps and snares that generally work by crushing, choking, or drowning an animal.<sup>13</sup>

The provinces set out varying requirements for how frequently traps and snares must be checked by those who set them. For live traps/snares, the strictest regulations require that they be checked at least once per day, though this can extend up to once every two or three days in some provinces. The least strict requirements are in Saskatchewan, where live traps/snares in certain areas can be left unchecked for up to five days, and in Quebec, where there is no mention at all of a required timeframe for checking traps. For killing traps/snares, there are only three provinces that require these be regularly checked with timeframes varying from 2–3 days (PEI), 1–5 days (Saskatchewan), and 14 days (BC).

**Animals with Offspring:** Many provinces restrict the killing of certain species of animals who have offspring with them. Two provinces (Quebec and PEI) have no such regulations. In PEI, this is related to the general absence of “big game”. In the other provinces, regulations exist to prohibit the killing of female black bears if they are accompanied by cubs. In New Brunswick and Ontario, these restrictions are limited to the spring season. In the other six provinces with these regulations (Alberta, BC, Manitoba, Newfoundland and Labrador, Nova Scotia, and Saskatchewan), killing female black bears accompanied by cubs is prohibited year-round. In two provinces, restrictions against killing animals with offspring extend to other species (namely cougars in Alberta and BC, and mountain goats in BC). Presumably, the types of species protected are limited because the restrictions are imposed for conservation purposes rather than animal welfare. Nonetheless, protecting young animals from becoming orphaned and forced to fend for themselves before being prepared to survive on their own has substantial welfare benefits.

**Hunting with Dogs:** There are varying restrictions on the use of dogs to hunt large mammals<sup>14</sup> across the provinces, which may serve to protect the wildlife, dogs, or both. The only cases where dogs are permitted in the hunting of all animals are BC and PEI. The latter should be considered a special case due to their general lack of large wildlife species. In Alberta, Nova Scotia, Ontario, and Saskatchewan, partial restrictions on hunting with dogs exist, such as prohibiting dogs or requiring that they be on leash when hunting certain species only. The remaining provinces (Manitoba, New Brunswick, Newfoundland and Labrador, and Quebec) have full prohibitions against the use of dogs in hunting large mammals.

**Fishing:** Oversight of fisheries is divided between federal and provincial governments based on the body of water and type of fish in question. Provincial fishing regulations are made under the authority of the federal *Fisheries Act*, and these regulations vary across the provinces in several ways, including which types of hooks can be used. Barbed hooks cause more damage to fish than barbless hooks and reduce the likelihood that a fish can survive if released after being caught. Manitoba is the only province with a full ban on barbed hooks. Partial bans restricting the locations within a province where barbed hooks are permitted, exist in BC, Ontario, Saskatchewan, and all of the Atlantic provinces. In Alberta and Quebec, there are no restrictions on the use of barbed hooks.

<sup>13</sup> Fur Institute of Canada. AIHTS—Humane Trapping Standards and Animal Welfare. Available at: [fur.ca/fur-trapping/humane-trapping-standards-and-animal-welfare](http://fur.ca/fur-trapping/humane-trapping-standards-and-animal-welfare)

<sup>14</sup> The individual species to which restrictions apply differ across the country, based on provincial regulations.



The provinces also vary on the ways they regulate how fish are to be released. There are regulations in Alberta, BC, Manitoba, PEI, Quebec, and Saskatchewan requiring that fish must be released in a manner that minimizes harm to the fish, and these provinces provide tips on how to do this. Tips are also provided by New Brunswick, Newfoundland and Labrador, and Nova Scotia, though they do not set out the requirement to inflict the least amount of harm possible. Ontario lacks both regulation and tips in this area. Finally, if fish are caught and being kept, none of the provinces set out acceptable ways of killing a fish.

**Poison:** Poisons are controlled substances that can only be used by licensed authorities. As such, hunting with poison is prohibited in every province across the country.<sup>15</sup>

In each province, police officers and conservation or wildlife officers are empowered to enforce the regulations on hunting, trapping, and fishing. In order to participate in these activities, individuals typically must be licensed (with some age-based exceptions). In the case of contraventions of the regulations, an individual's licence may be revoked. Additional enforcement tools include fines and imprisonment. Maximum penalties vary across the country, being lowest in the Atlantic provinces, where they range from \$3,500 to \$10,000. In the other provinces, maximum fines range from \$100,000 to \$1,000,000. Maximum terms of imprisonment vary across the country as well, with the shortest terms in the Atlantic provinces. PEI is the only province that does not use imprisonment as an enforcement tool. In New Brunswick, Newfoundland and Labrador, and Nova Scotia, the maximum terms of imprisonment range from two to six months. Among the other provinces, maximum terms range from one to three years.

Hunting, trapping, and fishing regulations in Canada have traditionally prioritized human interests well above of the needs and interests of wild animals, even when conservation goals are cited. Given the interconnectedness of human and animal well-being together with the integrity of our shared environment, Canada needs to take a more humane approach to mitigate our impacts on wildlife. The findings summarized above indicate there is significant opportunity to minimize the harms imposed on wildlife by updating provincial regulations to require humane, ethical practices that are consistent across the country. For example, all provinces should require all traps and snares be checked at least once per day. In addition, given that drowning is not a humane death, live traps and snares, including leg hold traps, should not be permitted for use in water. All provinces should protect animals year-round from being hunted if they are with their offspring and should prohibit hunting with dogs. As well, the most humane methods of catching, killing, and releasing fish should be required by all provinces. Given fishing regulations are all enabled under the federal *Fisheries Act*, it should be feasible to apply consistent requirements across the country.

<sup>15</sup> Certain poisons (pesticides) can still be used by licensed authorities as a means of "pest" control. The federal government regulates which poisons can be used in the context of pest control and who is approved to use them. At this time, Alberta and Saskatchewan are the only provinces that continue to use poison for wildlife management.



#### ENABLING CONDITION

*There are opportunities for wildlife to be provided with humane care, including a compassionate death.*

## Indicator C<sub>8</sub>

### Wildlife rehabilitation centres/sanctuaries

***Finding: Fewer than one hundred wildlife rehabilitation centres/sanctuaries exist across the country, and an uncertain funding environment poses challenges for the prevalence and sustainability of these organizations.***

Human activity clearly has deep impacts on wildlife. Being mindful of the needs and interests of animals and seeing them as individuals within the communities and environment we all share means we recognize and take responsibility for our impacts on them. Wildlife rehabilitation centres/sanctuaries provide protection and care for wildlife, often in response to harms caused by human activities. These facilities help wildlife recover from injuries and provide a safe environment to those who may no longer be able to survive in the wild. Where a life worth living is not possible, they can also provide a compassionate death.

In Canada, there are 86 wildlife rehabilitation centres/sanctuaries run by non-profit organizations or individuals distributed across the provinces as shown in the following table.<sup>16</sup>

<sup>16</sup> These numbers were identified by a review of information on wildlife rehabilitation centres sourced via general web search and review of the Wildlife Rehabilitator's Network of British Columbia (<https://www.wrmbc.org/contact/find-a-local-rehabilitator/>), the Ontario Wildlife Rehabilitators List (<https://www.ontario.ca/page/find-wildlife-rehabilitator>), and a national list of wildlife rehabilitators available from Nature Canada (<https://naturecanada.ca/discover-nature/land-wildlife/sick-injured-or-orphaned-wild-animals/>).

### Number of wildlife rehabilitation centres/sanctuaries in Canada

PROVINCE	WILDLIFE REHABILITATION CENTRES/SANCTUARIES
Alberta	7
British Columbia	24
Manitoba	2
New Brunswick	1
Newfoundland and Labrador	1
Nova Scotia	3
Ontario	41
Prince Edward Island	1
Quebec	2
Saskatchewan	4
<b>TOTAL</b>	<b>86</b>



Provincial governments and the federal Canadian Wildlife Service oversee and determine who is permitted to provide care for various kinds of wildlife. The federal government issues permits related to the rehabilitation of migratory birds, while provincial governments issue permits related to the rehabilitation of other species that are regulated under provincial wildlife legislation.

Other non-governmental organizations work to harmonize and support the efforts of wildlife rehabilitators in Canada. Organizations such as the Wildlife Rehabilitators' Network of British Columbia, the National Wildlife Rehabilitation Foundation, and the National Wildlife Centre provide resources, including educational and financial support, rehabilitator networks, guidance on best practices, and advocacy. They also help connect members of the public with rehabilitators.

Outside of these organizations there is little to no comprehensive support for wildlife rehabilitation centres/sanctuaries, which tend to rely on volunteer services and uncertain funding sources, such as ad hoc grants and donations. This situation limits the support that can be provided and presents challenges to the sustainability of services.

In a humane country, diligent, system-wide decisions will be made to reduce our impacts on wildlife. Recognizing the historically unparalleled level of impacts human activity currently poses, rehabilitation centres/sanctuaries provide a critical role in caring for countless animals who may be suffering as a result. While better consideration of wildlife impacts is needed to make Canadian decision-making frameworks more humane, government funding is sorely needed to provide a solid foundation for the compassionate work of wildlife rehabilitation.





#### ENABLING CONDITION

*Exploitative uses of animals are not acceptable.*

### Indicator C<sub>9</sub> Fur farming

***Finding: The number of fur farms in Canada is at a record low of 97. This exploitative practice should be eliminated entirely by way of provincial or national bans on fur farming.***

Fur farming is an exploitative use of animals, that is, where animals are used and subjected to suffering for unnecessary reasons, such as fashion or entertainment. Commercial fur farming involves intensive operations in which wild animals are bred and kept in wire cages until they are killed for their fur to be harvested and sold to fashion and cosmetic industries for the production of consumer goods. The conditions in which the animals are kept restrict their ability to perform natural behaviours and often lead to physical and mental distress. Farmed fur is used in clothing and other fashion accessories, as well as in cosmetic products like eyelash extensions, among other applications. Despite the unnecessary nature of fur across modern Canadian society and the high quality of artificial alternatives available, the practice of fur farming continues to be permitted in Canada.

The primary types of animals used for fur farming in Canada are mink and fox. Data on the farming of these animals is recorded by Statistics Canada every five years under the Census of Agriculture. The 2021 census identified that there were 97 fur farms in Canada, comprising 79 mink farms and 18 fox farms. This marks the lowest number of fur farms reported since data collection began in 1981. Fur farms were distributed across the country as shown in the following table.<sup>17</sup>

17 Statistics Canada (2022). Table 32-10-0155-01 Selected livestock and poultry, Census of Agriculture historical data. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3210015501>





#### Distribution of mink and fox farms according to 2021 Census of Agriculture

PROVINCE	MINK FARMS	FOX FARMS
Alberta	3	3
British Columbia	12	0
Manitoba	3	0
New Brunswick	1	5
Newfoundland and Labrador	5	1
Nova Scotia	26	6
Ontario	26	0
Prince Edward Island	1	1
Quebec	2	1
Saskatchewan	0	1
<b>TOTAL</b>	<b>79</b>	<b>18</b>

The 2021 census found there were 236,222 mink distributed across the 79 total mink farms and 1,521 fox across the 18 fox farms.

Statistics Canada previously released fur farm data on an annual basis with more in-depth information, but the most recent year in which that level of data was collected is 2018. That data identified 98 mink farms and 27 fox farms in 2018 with 1.76 million mink and 2,360 fox killed and pelted that year. Additionally, there were 136,100 mink and 130 fox who died or escaped before being pelted, and 44,500 mink and 230 fox who were sold alive.

Reviewing the data over a five-year trend (2014–2018) shows a steady decrease in the total number of farms, down from 237 mink farms and 50 fox farms in 2014 to fewer than half as many by 2018. There was also a significant steady decline in the total number of animals killed and pelted, down from 3.38 million mink and 7,465 fox in 2014.<sup>18</sup> The downward trend in the total number of farms has continued through 2021. This overall decline suggests fur farming is a dying industry, which aligns with attitudes of Canadians, as reflected by their interest in a nationwide ban on fur farming.

A survey conducted in February 2022 found 74% of Canadians support a ban on fur farming.<sup>19</sup> Canadians have also expressed their opposition to the practice through government petitions in 2021. Electronic petition e-3096 called on Canada to implement a nationwide ban on fur farming.<sup>20</sup> The petition received 7,738 signatures over the course of two months. A second petition, e-3063, during the same period secured an additional 2,522 signatures of those calling specifically for a ban on mink farming throughout the country.<sup>21</sup> The response to the petitions from the Minister of Agriculture and Agri-Food mentioned the federal government's involvement in developing codes of practice for fur farming but misses the main point that fur farming is an unnecessary practice that should not be condoned in any form. The government response also noted that responsibility for animal welfare primarily falls to the provinces and territories, suggesting bans on fur farming would be better left to the discretion of these jurisdictions.

On November 5, 2021, the Government of BC announced a plan to phase out mink farming in the province, which consists of a ban against having live mink on farms instated in April 2023, and a requirement for all mink farming operations to cease and all pelts to be sold by 2025. The Government of BC cited public health risks associated with the COVID-19 pandemic as the reason for this decision, due to the possibility of the virus circulating among mink populations, mutating, and being transmitted to humans, as was observed elsewhere. This decision would also reduce the risk of other zoonotic diseases, an inherent danger with intensive animal agriculture farming, including fur farming. While animal welfare concerns were not explicitly cited in the BC decision, it nevertheless sets a precedent for broader bans on fur farming across other species and in other provinces.

While the federal Minister of Agriculture noted that protection of animal welfare primarily falls to the provinces, the government of Canada does exercise some power in this area, and there are ongoing efforts to address fur farming at the national level. On February 8, 2022, MP Nathaniel Erskine-Smith introduced Bill C-247 in the House of Commons. The bill, otherwise known as the *Prohibition of Fur Farming Act*, seeks to introduce a ban on all fur farming activities in Canada. A national ban of this sort would end an exploitative practice that treats animals as consumer products and place Canada alongside international policy leaders such as the UK, the Netherlands, Norway, as well as 15 other countries, at the time of writing.<sup>22</sup>

18 Statistics Canada (2021). Supply and disposition of mink and fox on fur farms. Available at: Table 32-10-0116-01 Supply and disposition of mink and fox on fur farms

19 The Fur-Bearers (2022). 3/4 of Canadians support a ban on fur farming. Available at: <https://thefurbearers.com/blog/3-4-of-canadians-support-a-ban-on-fur-farming/>

20 Parliament of Canada (2021). e-3096 (Animals). Available at: <https://petitions.ourcommons.ca/en/Petition/Details?Petition=e-3096>

21 Parliament of Canada (2021). e-3063 (Animals). Available at: <https://petitions.ourcommons.ca/en/Petition/Details?Petition=e-3063>

22 The Fur Free Alliance. Fur Bans. Available at: <https://www.furfreealliance.com/fur-bans>





## Indicator C<sub>10</sub>

### Animals kept in captivity and used for entertainment

***Finding: Hundreds of animal-based entertainment facilities and events still exist in Canada, even though they exploit animals.***

Using animals for entertainment purposes generally involves keeping them captive in settings that prevent them from engaging in natural physical and social behaviours that are critical to their welfare. Popular forms of entertainment involve removing animals from their natural habitats, maintaining them in zoos and aquaria where they can be easily observed, and in some cases having them engage in thrilling tricks and activities, such as at circuses. In the case of rodeos, even if the animals are domesticated rather than wild, the extreme, sensational activities involved cause distress. Many animals suffer physically and mentally in these settings. Some animals used in performances may be forced to endure harmful training, or they may be used as objects for sport at rodeos where they can experience injury or death. Additionally, those animals held in a captive state are particularly vulnerable in times of crisis. When evacuations are required, such as during times of war or natural disaster, captive animals are unable to fend for themselves and depend on rescue efforts if they are to have any chance of survival. Prioritizing the opportunity for humans to engage in such leisure activities above the basic welfare needs of animals is exploitative.

Canadian protections for animals in captivity are limited and inconsistent. At the federal level, Bill S-203 (*Ending the Captivity of Whales and Dolphins Act*) was passed in 2019, amending the *Criminal Code*, the *Fisheries Act*, and the *Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act* to implement a ban on the keeping, breeding, and trading of whales, dolphins, and porpoises. Otherwise, federal protections for animals in captivity are limited to the general provisions of the Cruelty to Animals section of the *Criminal Code*. Further protections may come at provincial or municipal levels,

but these are also limited. In BC, Alberta, Saskatchewan, Quebec, Nova Scotia, and PEI, permits are required to operate a facility that keeps wildlife in captivity, the applications for which involve meeting standards that promote adequate care for these animals. In the other four provinces, permits of this sort are not required but licences may be required to legally keep certain species of wildlife in one's care. In Ontario, keeping non-native wildlife in captivity is not regulated at the provincial level, but is left to the municipalities.

While rodeos are not explicitly addressed by legislation in Canada, common rodeo activities cause pain, suffering and injury, and should therefore should be considered unlawful. However federal and provincial laws are not being applied and enforced in the context of rodeo.

Currently, in Canada, there are an estimated 91 zoos, 106 mobile zoos and animal expositions, and 13 aquaria.<sup>23</sup> It is estimated that 205 rodeos took place in 2023, as identified through national and provincial rodeo associations and independent event websites. There are currently no animal-based circuses that operate out of Canada, though travelling circuses from other regions may still bring animals to Canadian cities that do not have municipal bylaws against this. The distribution of venues and events is shown in the table below.

#### Distribution of animal-based entertainment facilities and events by province

PROVINCE	ZOOS	MOBILE ZOOS	AQUARIA	RODEOS
Alberta	4	12	1	81
British Columbia	12	12	3	25
Manitoba	3	4	1	12
New Brunswick	2	2	2	1
Newfoundland and Labrador	1	3	1	0
Nova Scotia	3	2	0	2
Ontario	44	48	3	30
Prince Edward Island	0	4	1	1
Quebec	19	14	1	22
Saskatchewan	3	5	0	31
<b>TOTAL</b>	<b>91</b>	<b>106</b>	<b>13</b>	<b>205</b>

As evidenced by the limited patchwork of protections described above, a consistent cross-country approach to regulating and monitoring the use of animals for entertainment purposes is needed. Advancements like those made under Bill S-203 are an excellent start with regard to captivity, and much more work must be done in Canada to protect animals from harms inflicted in the name of entertainment.

<sup>23</sup> These numbers were determined via review of information collected from Zoocheck, World Animal Protection, and general web search.

## ENABLING CONDITION

*Wild or exotic species are not kept as companion animals*

### Indicator C<sub>11</sub>

#### Exotic pets

***Finding: An estimated 1.4 million exotic animals are kept as pets in Canadian households. Additional legislation is needed to regulate the keeping of exotic animals in Canadian households and should be aimed at banning the practice altogether.***

The keeping of exotic<sup>24</sup> pets for our own companionship, novelty, or curiosity is another situation where human interests are prioritized over the needs and interests of the animals. Even if a pet owner has respect for the animals and a desire to provide a good level of care, in the vast majority of cases, conditions will be inadequate to ensure the animals have good welfare. According to a recent report, *Risky business: The unregulated exotic pet trade in Canada*, released by World Animal Protection in 2019, 1.4 million wild animals are estimated to be kept as exotic pets in Canada. The report found that these animals consisted of more than 475,000 birds; 180,000 wild cats; 160,000 snakes; 125,000 turtles and tortoises; 125,000 wild dogs; 90,000 amphibians; 50,000 arachnids; and 14,000 crocodiles and alligators.<sup>25</sup>

Keeping exotic pets presents many wide-ranging harms.<sup>26</sup> During the process of being captured or bred and then transported for sale, many animals suffer or die before reaching their destination. For the animals who do reach their destination and begin their lives as companion animals, they face many of the same captivity-related harms mentioned under indicator C<sub>10</sub> above. Under captive conditions that are unable to satisfy adequately their environmental, behavioural, and social needs, these animals are likely to suffer physically and mentally. Wild animals have not evolved with humans and thus have not adapted to human interaction as have domesticated animals (such as dogs and cats) over thousands of generations. In addition to the harms suffered by these animals, taking them from the wild threatens the survival of species due to the impacts of poaching on wild populations and their native ecosystems, presents increased risks of disease transmission, and can result in harms to local ecosystems if the exotic animals escape from captivity. Furthermore, there are significant public health and safety concerns, including the risk of zoonoses.

Unfortunately, laws against keeping exotic animals as pets are inconsistent across Canada. At the federal level, the passage of Bill S-203 (*Ending the Captivity of Whales and Dolphins Act*) in 2019 resulted in amendments to the *Criminal Code*, the *Fisheries Act*, and the *Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act* to implement the first prohibition on keeping exotic animals, specific to cetaceans. Provincially, Prince Edward Island has some of the most stringent licensing requirements and restrictions on certain species and includes animal welfare considerations in the development of their exotic pet laws. However, provincial laws vary widely. In Ontario, there is no provincial regulation at all.<sup>27</sup> Because of the severe welfare concerns, as well as widespread ecological, and public health and safety risks, legislation is needed at federal and provincial levels to address the keeping of exotic animals.

24 The term exotic pets in this indicator refers to companion animals who are wild and not native to Canada. Humane Canada's position statement on wild or exotic animals includes this definition: A wild or exotic animal is any animal, native or non-native to Canada, that has not been subject to domestication through many generations of selective and controlled breeding and thereby adapted to living in close association with humans.

25 World Animal Protection (2019). *Risky business: The unregulated exotic pet trade in Canada*.

Available at: [https://www.worldanimalprotection.ca/sites/default/files/media/ca\\_-\\_en\\_files/wap\\_exotic\\_pets\\_in\\_canada\\_report\\_final\\_forweb\\_oct\\_3\\_2019.pdf](https://www.worldanimalprotection.ca/sites/default/files/media/ca_-_en_files/wap_exotic_pets_in_canada_report_final_forweb_oct_3_2019.pdf)

26 Warwick, C. et al. (2018). Exotic pet suitability: Understanding some problems and using a labeling system to aid animal welfare, environment, and consumer protection. *Journal of Veterinary Behaviour*, 26: 17.

27 For a more detailed review of provincial regulation on keeping exotic animals as pets, see: World Animal Protection (2019). *Risky business: The unregulated exotic pet trade in Canada*, p. 19. Available at: [https://www.worldanimalprotection.ca/sites/default/files/media/ca\\_-\\_en\\_files/wap\\_exotic\\_pets\\_in\\_canada\\_report\\_final\\_forweb\\_oct\\_3\\_2019.pdf](https://www.worldanimalprotection.ca/sites/default/files/media/ca_-_en_files/wap_exotic_pets_in_canada_report_final_forweb_oct_3_2019.pdf)





## About Humane Canada

Humane Canada is the federation of SPCAs and humane societies. As Canada's voice for animal welfare, we drive positive progressive change to end animal cruelty, improve animal protection, and promote the humane treatment of all animals. Humane Canada convenes and represents the largest animal welfare community in the country. Together with our Members and Associates in every province and two territories, we advance the welfare of animals with a strong national voice, promoting animal welfare interests and concerns to government, policymakers, industry, and the public.

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