

Controlled Alien Species Regulation Review

Submission from Vancouver Humane Society (VHS)

Introduction

The Vancouver Humane Society is a registered charity dedicated to the humane treatment of animals. Since 1984, we have been encouraging individuals, organizations, and governments to take responsibility for the welfare and rights of domestic animals and wildlife influenced by human activities.

VHS has worked on animal welfare issues related to the trade and possession of exotic animals* since the 1980s. This work has focused on bringing such issues to public attention and urging municipalities to enact bylaws prohibiting or restricting the sale of exotic animals.

Much of this work took place prior to the introduction of the provincial Controlled Alien Species Regulation (CASR) in 2009, which addressed some key concerns. VHS made a [submission](#) to the provincial government's consultation on CASR in 2007.

Most recently, VHS has sought to draw public attention to the wildlife trade, which is known to compromise animal welfare, threaten harvested wild populations, create risks to public health through the spread of zoonotic disease and damage ecosystems with the introduction of invasive species.

**This report uses the BC SPCA's definition of exotic animals as "Species that are non-domesticated, non-indigenous wild animals, whether captured from the wild or captive-bred."*

Background

The scale of the trade in exotic animals

The global wildlife trade is a multi-billion dollar industryⁱ that includes the exotic pet trade in Canada. Between 2007 and 2017, more than 23 million wild animals were imported into Canada for commercial or personal reasons.ⁱⁱ According to [research](#) by World Animal Protection, there are 1.4 million exotic animals kept as pets in Canada, including 478,648 birds, 462,893 reptiles and 342,250 mammals. The research estimated 191,490 exotic pets are kept in British Columbia.

Animal welfare

The welfare of animals kept as exotic pets has been a concern for many years and their suitability to captive environments has been questioned by researchers.ⁱⁱⁱ

Many animals transported for sale as exotic pets are known to die in transit, due to poor handling and housing. For example, research by World Animal Protection found that up to 66% of African grey parrots poached from the wild for the exotic pet trade will die in transit. A 2014 [study](#) concerning an exotic pet wholesaler found extremely high mortality rates.

Once sold as pets, the animals face captivity in environments that often cannot meet their behavioural and biological needs. Most captive animal facilities find it difficult to replicate natural environments and, consequently, animals are deprived of the full range the experiences normally provided in their natural habitats. Captive-bred exotic animals retain the same biological and behavioural needs as their wild counterparts.

Research has identified misinformation by pet sellers and inadequate husbandry knowledge by pet buyers as contributing to poor exotic pet welfare.^{iv} This can result in a number of welfare challenges for exotic pets, which have been identified by researchers at Zoocheck, a Canadian-based wildlife protection charity:

- Restricted movement due to lack of space
- Limited behavioural opportunities/ forced idleness
- Reduced/ unnatural food and feeding opportunities
- Reduced retreat space/ violation of fight/flight distance
- Abnormal social groups
- Forced proximity to humans/ observation-related effects
- Exposure to unnatural lighting and light cycles/ aversive sounds and odours
- Inadequate/ uncomfortable temperatures and environmental conditions
- Inappropriate/ uncomfortable substrates
- New diseases and parasites

Such challenges can severely compromise animal welfare and result in high mortality rates. A 2012 U.K. [study](#) found that that at least three-quarters of exotic animals bought in the UK die within a year of purchase.

Risks to public health

The threat of zoonotic disease from the wildlife trade has been known for some years. In July 2003, the medical journal [The Lancet](#) described the exotic pet trade as “a disaster ignored” and called for its end. The wildlife trade is still [thought](#) by scientists to be the most likely origin of the current Covid-19 pandemic.

A recent United Nations [report](#) on preventing zoonotic pandemics states: “The close contact between humans and different species of wildlife in the global wildlife trade can facilitate animal to-human spillover of new viruses that are capable of infecting diverse host species. This can trigger emerging disease events with higher pandemic potential because these viruses are more likely to amplify via human-to-human transmission, and thus spread widely.”

In addition to concerns about virus pandemics, a number of zoonotic diseases have long been associated with exotic pet ownership. A 2014 [article](#) in the journal of The Canadian Institute of Public Health Inspectors, stated: “The popularity of having exotic animals as pets is increasing, particularly among children. It is also estimated that approximately 75% of emerging infectious diseases are zoonotic. The implications of these two trends are areas of concern for the public health community.” The article added that: “Pets have been the source of numerous human infections across North America such as salmonellosis, tularensis, murine typhus, monkeypox, cutaneous larvae migrans, and Human Lymphocytic Choriomeningitis Virus (HLCV) infections.”

Invasive species and threats to biodiversity

The Canadian Council on Invasive Species has [stated](#) that: “Invasive species threaten and can alter our natural environment and habitats and disrupt essential ecosystem functions.” The Council says invasive species, once established, can:

- reduce soil productivity
- impact water quality and quantity
- degrade range resources and wildlife habitat
- threaten biodiversity
- alter natural fire regimes
- introduce diseases

A 2019 [study](#) describes the role that the exotic pet trade plays in the introduction of invasive species, stating: “The exotic pet trade pathway has already led to the establishment of several hundred non-native and invasive vertebrate animal species globally, and is poised to contribute to the establishment of even more in the future.” (For example, the study says that, of the 140 non-native reptiles and amphibians that have been introduced into Florida, nearly 85% arrived via the pet trade.)

The exotic pet trade has been identified as a driver of species loss, with one 2020 [study](#) stating: “The exotic pet trade presents a serious threat to wild populations of reptiles and amphibians.”

Controlled Alien Species Regulation (CASR)

The introduction of the Controlled Alien Species Regulation in B.C. in 2009 addressed some of the most serious and urgent problems created by the possession of exotic animals by B.C. residents. For example, CASR prohibited ownership (without a permit) of dangerous animals such as tigers and venomous snakes, which were included in a list of more than 1,000 animals designated as controlled alien species because they pose a potential threat to people, property, wildlife and wildlife habitat.

However, as CASR did not focus on animal welfare, many species whose welfare might be compromised in captivity were not included on the list. Similarly, there was less focus on animals posing a potential zoonotic disease risk than animals posing a threat of physical harm. A 2012 [report](#) examined CASR in relation to zoonotic disease and recommended that the provincial government “continue to review the public health risks associated with zoonoses and implement regulations to minimize the transmission to individuals.”

Recommendation

The review of CASR is timely, as public concerns about the wildlife trade, in terms of both animal welfare and zoonotic disease are growing due to media attention drawn to these issues by the Covid-19 pandemic.

Internationally, there have been [calls](#) for governments to curb the global wildlife trade, with similar [appeals](#) to the federal government to act at the national level.

Much of the regulatory responsibility for the trade and ownership of exotic animals remains at the provincial and municipal level. This has left a “patchwork” of regulation throughout Canada, with differing regulatory approaches in each province and in towns and cities across the country.

The early establishment of CASR provided British Columbia with an advantage over other provinces in addressing the issues created by the wildlife trade, especially the potential risk of physical harm from dangerous species. The review of CASR now provides an opportunity to address deficits in the regulation, as it pertains to zoonotic disease and animal welfare.

Since CASR was put in place in 2009, much discussion has taken place internationally about how best to address the problems created by the exotic animal trade, including the the concept of the “positive list.”

Positive lists

Currently, legislation and regulation concerning the trade and possession of exotic animals involves restricting or banning problematic species, which is referred to as “negative listing.” CASR is an example of negative listing.

In recent years, an alternative approach adopted by some jurisdictions allows only those species that meet certain scientifically proven criteria to be sold and kept as pets. These “positive lists” include only those species that are suitable to keep in domestic settings and that do not present a disproportionate risk to people or the environment.

While there are clear advantages to positive lists, there are a number of important factors for success to be considered. These have been identified in the linked studies.

The advantages attributed to positive lists include:

- They are short and easily understood by the public. Unlike negative lists, positive lists contain only those animals deemed (by evidence-based criteria) to be suitable pets, so they are generally shorter. For example, CASR lists more than 1000 animals. [Belgium’s](#) positive list of permissible pets contains 42 species. This provides clarity to the public as to what animals are permitted as pets.
- They use an evidence-based approach. Evidence of animal suitability as pets (in terms of public health and safety, animal welfare, environmental protection) can be applied to list compilation.

- They are preventative and safety-focused, using the precautionary principle. The precautionary principle is commonly applied to suitability criteria in various sectors, for example in consumer product safety (e.g. drugs, electrical products, food additives). Only those products meeting the regulatory criteria are permitted for sale, thus maximizing public safety. Negative lists of legally permitted exotic pets purchases are an anomaly in this respect.
- The onus is on those who wish to trade or keep exotic animals to identify animals suitable as pets. Currently, it is incumbent on regulators using negative lists to determine whether an animal should be prohibited, thus requiring assessments of animals in terms of threats to public health and safety, environmental risks and animal welfare concerns. Compilation of a positive list would put the “burden of proof” that an animal is suitable as pet on those who support the trade and keeping of exotic animals. Again, this would be consistent with practice in other sectors. For example, the onus is on car manufacturers to meet safety standards and other criteria set by regulators, through the provision of test results and other data to regulators. Without such data, the car would, by default, be excluded from the market.
- Positive lists have now been established in several jurisdictions. Belgium, Luxembourg, Malta, Norway and the Netherlands have introduced the concept of positive lists of animals acceptable as pets. In Canada, New Brunswick has established a positive list. These are described in a 2020 study: [Turning Negatives into Positives for Pet Trading and Keeping: A Review of Positive Lists](#).

Establishing criteria for positive lists

Determining which animals should be included on a positive list requires establishing evidence-based suitability criteria pertinent to animal welfare; public health and safety; and environmental and biodiversity protection.

Animal welfare

Inclusion criteria should ensure listed animals can express a normal range of natural behaviours (e.g. flying, running, swimming) and have their environmental (e.g. nutritional, thermal, humidity) needs met in a captive environment. The animal should also be able to be treated by a veterinarian living within a minimum 6-hour range that is knowledgeable about the species.

Several other factors should be considered, including but not limited to:

- Lifespan: Some animals (e.g. parrots, turtles) have long lifespans, requiring unexpected long-term commitments from pet owners that can lead to abandonment.
- Animal range and migratory behaviour: Wide ranging and migratory animals are not suited to limited space in captivity.

- When the animal is naturally active: Nocturnal animals are not suited to interaction with pet-owning households active in daytime.

Public health and safety

Animals posing significant threats of zoonoses, physical harm (biting, scratching), poisoning (venom) should be excluded from positive lists.

Environmental and biodiversity protection

Invasive species posing a threat to wildlife should be excluded. Animals classified in relevant legislation as endangered, threatened, or of special concern should not be listed.

Evidence-based criteria

Independent, scientific, peer-reviewed evidence should be used in establishing criteria for inclusion on the list. It must conclude an animal's welfare is not compromised and does not pose threats to public health and safety or to the environment and biodiversity.

A useful resource for providing such information is [EMODE](#), an online system that allows users to score animal species or types as easy, moderate, difficult or extreme, taking account of how challenging they are to keep in terms of their biological needs as well as addressing human health and safety issues. The CITES species list and IUCA Red List are also sources for relevant evidence.

A 2018 study provides a specific examination of criteria for pet suitability: [Exotic pet suitability: Understanding some problems and using a labeling system to aid animal welfare, environment, and consumer protection](#)

Positive lists: A way forward

The problems created by the exotic animal trade (compromised animal welfare; risks to public health and safety; threats to the environment and biodiversity) are well-documented and demand action. The timely review of the Controlled Alien Species Regulation provides an opportunity for British Columbia to address these issues, potentially providing a model for other provinces to follow.

The Vancouver Humane Society, along with other animal welfare and conservation organizations, supports the concept of positive lists, which, as shown above, can provide an improved regulatory tool to address the harms inherent in the exotic animal trade.

We therefore strongly recommend that the provincial Wildlife and Habitat branch incorporate a positive list framework in updating the Controlled Alien Species Regulation.

Appendix

Notes

ⁱ Scheffers, B. R., Oliveira, B. F., Lamb, I. & Edwards, D. P. Global wildlife trade across the tree of life. *Science* 76, 71–76 (2019)

ⁱⁱ Toland, E., Bando, M., Hamers, M., Cadenas, V., Laidlaw, R., Martínez-Silvestre, A., van der Wielen, P., 2020. A review of positive lists for pet trading and keeping. *Animals* 10, 2371

ⁱⁱⁱ R.A. Grant, V.T. Montrose, A.P. Wills ExNOTic: Should we be keeping exotic pets? *Animals*, 7 (47) (2017), pp. 1-11

^{iv} Warwick, C., Steedman, C., Jessop, M., Arena, P., Pilny, A., & Nicholas, E. (2018). Exotic pet suitability: understanding some problems and utilizing a labeling system to aid animal welfare, environment, and consumer protection. *Journal of Veterinary Behavior*.

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