

# Protecting animals, people, and ecosystems: strengthening B.C.'s exotic animal regulations

Submission from Vancouver Humane Society (VHS)

## Summary

- **Recommendation:** The VHS supports B.C.'s proposed exotic cat ban and strongly recommends adopting a positive list framework that allows only species proven suitable as pets based on scientific welfare, health, and environmental criteria.
- **Animal welfare concerns:** Many exotic species have complex needs that cannot be met when kept as pets, leading to suffering and poor living conditions.
- **Public health risks:** Approximately 75% of emerging infectious diseases are zoonotic; exotic pet trade increases risk through stress, close human contact, and species mixing.
- **Environmental impacts:** Accidental or intentional release of exotic pets can introduce invasive species, harming biodiversity and exacerbating climate change impacts.
- **Gaps in current Controlled Alien Species Regulation (CASR):**
  - Focuses on dangerous species but does not consider animal welfare and many zoonotic disease risks;
  - Lack of consistent and enforceable standards for keeping, breeding, and trading exotic pets.
- **Incidents in B.C.:** Multiple escapes/releases and disease outbreaks have been linked to exotic pets, particularly reptiles.
- **Lack of care capacity:** Shortages of specialized veterinary care and shelter/rescue/sanctuary space for exotic animals.
- **Public sentiment:** Polling shows strong opposition to exotic pet trade and support for stronger protections.

## Introduction

The Vancouver Humane Society (VHS) is a registered charity advocating for humane animal treatment. Since the 1980s, we have worked to address the trade and possession of exotic animals\* as a significant animal welfare, environmental, and public health issue.

\*Exotic animals: non-domesticated, non-native wild species, whether wild-caught or captive-bred (B.C. SPCA definition).

## Background

### The scale of the exotic animal trade

The global wildlife trade is a multi-billion dollar industry that includes the exotic pet trade in Canada.<sup>1</sup> Between 2007 and 2017, more than 23 million wild animals were imported into

Canada for commercial or personal reasons.<sup>ii</sup> 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.<sup>iii</sup> The research estimated 191,490 exotic pets are kept in British Columbia.

### **Animal welfare impacts**

Exotic animals, whether wild-caught or captive-bred, retain their complex social, physiological, and behavioural needs that they would have in the wild. Attempting to replicate their natural environment in a captive setting is incredibly challenging and failure to meet their needs can significantly compromise their welfare.

Animals transported for sale as exotic pets may be at risk of injury and death during transit and once sold as pets, they face captivity in environments that often cannot meet their behavioural and biological needs. Consequently, animals are deprived of the full range of experiences normally provided in their natural habitats.

Research has identified misinformation by pet sellers and inadequate husbandry knowledge by pet buyers as contributing to poor exotic pet welfare.<sup>iv</sup> 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:<sup>v</sup>

- 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;

### **Environmental risk**

Exotic pet release, whether accidental or intentional, is a major pathway for invasive species introduction.<sup>vi</sup> These invasive species often possess traits such as rapid growth, generalist diets, and high reproductive capacity that allow them to thrive and subsequently threaten and outcompete native species for habitat and food. This can alter ecological relationships, cause disease introduction and transmission, strain conservation efforts for species at risk and result in irreversible impacts. B.C. has experienced invasive pet species, including the red-eared slider turtle, American bullfrog and Brazilian elodea.<sup>vii</sup>

A scientific case study in B.C. illustrates the significant threat native species face because of invasive species.<sup>viii</sup> One example is the introduced fungal pathogen causing chytridiomycosis in amphibians that has quickly spread across B.C. and globally, with significant effects on host populations, including cases of extirpation. Importantly, the study also raises concern about the connection between climate change and invasive species, noting that climate change is already

accelerating the introduction and spread of invasive species. It goes on to suggest that “invasive species may also exacerbate climate change impacts on native species by reducing the climate resilience of natural habitats.”

### **Public health and safety concerns**

Research indicates that 75% of emerging infectious diseases are zoonotic (transmitted from non-human animals to humans).<sup>ix</sup> Factors that increase the risk of disease spread include more animal species; higher risk species; more animal numbers; more human contact; greater geographic ranges; movement from less encountered areas; species we know less about; mixing of species (in transit, upon arrival); less structure/scrutiny.<sup>x</sup>

Stress in animals can also lead to weakened immune systems and increased shedding and transmission of infectious disease. The transport of animals through the exotic pet trade and frequent handling presents a significant risk factor for stress. Stressed animals may also be more likely to bite or scratch, which is a primary way infectious disease is spread.

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.”<sup>xi</sup> 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.”

### **Controlled Alien Species Regulations**

The introduction of the Controlled Alien Species Regulation (CASR) in B.C. in 2009 addressed some of the most serious and urgent problems at the time, created by the possession of exotic animals by B.C. residents. For example, the 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, the CASR does not consider animal welfare in its criteria for which animals are prohibited. Similarly, while the regulations focused on species that pose a serious threat of physical harm, they fail to prioritize those that pose a potential zoonotic disease risk. Many species that suffer in captivity or pose disease threats remain legal to own and trade.

## **The case for stronger exotic animal regulations**

### **Alignment with proposed ban considerations**

The province’s proposed ban on exotic cat ownership cites animal welfare organizations and wildlife experts long-standing concerns and calls for regulatory measures to address public safety and environmental risks posed by exotic cats.<sup>xii</sup> It’s noted that “this change would provide

consistent and enforceable guidelines to strengthen protections for communities, native wildlife, ecosystems, pets and exotic cats themselves.”

The VHS supports the proposed ban on exotic cat ownership and, for the same justifications outlined in the province’s information bulletin, recommends that the regulations be updated to allow only species proven suitable as pets based on evidence-based welfare, health, and environmental criteria.

### **Exotic pet expo evidence**

Like exotic cats, other exotic species often suffer when traded and kept as pets. The VHS has documented exotic pet expos in B.C. in recent years, where a variety of reptiles, amphibians, arachnids, and other species are transported to events, put on display, and sold to the general public.

The VHS’s documentation of these expos has revealed a number of welfare issues, including:

- Long-distance animal transport, including from out-of-province vendors;
- Small, barren enclosures with no opportunity for natural behaviours or the ability to escape the view of the public and other animals;
- Frequent public handling, increasing risk of injury and disease spread.

EMODE (Easy, Moderate, Difficult, Extreme) Pet Score is a system developed by leading scientists and vets to assess the suitability of animals as pets based on how challenging they are to keep.<sup>xiii</sup> EMODE rates servals and caracals as “difficult” to “extreme” to keep - similar ratings apply to many other exotic species sold at expos. For example, bearded dragons, ball pythons, corn snakes, and Hermann’s and Red-footed tortoises are rated as difficult; hognose snakes, blood pythons, kingsnakes, rainbow boas, tegu lizards, monitors, crested, gargoyle and day geckos are rated as difficult to extreme; and carpet pythons are rated as extreme. This illustrates the complexity of meeting the needs of both exotic cats and other exotic species when kept as pets.

### **Exotic pet incidents in B.C.**

World Animal Protection has created an online database that tracks exotic animal incidents across Canada, including escapes, intentionally released animals, and disease outbreaks.<sup>xiv</sup> In the last decade, there have been seven documented disease outbreaks in B.C. linked to the exotic pet trade, four of which occurred in 2023 and 2024 and were associated with snakes, lizards, and geckos. Since the introduction of the CASR in 2009, there have been nearly 40 documented animal escapes/releases in B.C., the majority of which were linked to reptiles, illustrating the urgent need for a comprehensive update to the CASR that includes all exotic pets.

### **Lack of specialized care and resources**

Veterinary shortages and overwhelmed shelters further limit the capacity to care for surrendered or abandoned exotic pets. In recent years, some veterinarians have had to cut their services to exotic animals in order to focus on the significant influx of domestic animals in need of care.<sup>xv</sup> In addition to this, many animal shelters, rescues, and sanctuaries are not only operating at or

above capacity, but are also not equipped to take in exotic animal surrenders of such a wide range of species who require specialized care.

### **Lack of consistent and enforceable guidelines**

There is a lack of consistent and enforceable guidelines when it comes to the keeping, breeding, and trade of exotic pets in B.C. These activities are not prescribed as regulated activities in B.C., which means there are no defined accepted practices or standards that guide the exotic pet industry. In practice, this allows the exotic pet industry to set its own rules and leaves exotic animals at significant risk of poor welfare due to inadequate housing and environmental conditions, inappropriate diets, and the inability to engage in important natural behaviours.<sup>xvi</sup>

### **Public sentiment**

Polling commissioned by World Animal Protection Canada in 2020 found that a strong majority of Canadians do not support the capture, breeding and trade of wild animals for the exotic pet industry.<sup>xvii</sup> Polling data indicates that Canadians believe the wild animal trade is cruel and can cause animal suffering (93%); threatens biodiversity and can cause species extinction (89%); and threatens human health and can cause pandemics (89%). Locally, the VHS commissioned public polling in 2021 that reveals 89% of British Columbians oppose the international trade of exotic, wild animals to be kept on display in permanent captivity.<sup>xviii</sup> Collectively, this polling data reinforces that the welfare of exotic animals in captivity is indeed an issue of concern for the public.

### **Recommendations**

- 1. Prohibit the breeding, sale, and future ownership of all exotic cat species;**
- 2. Extend the scope of the proposed ban to consider all exotic species that do not thrive in human care, utilizing a positive list framework that allows only species proven suitable as pets based on welfare, health, and environmental criteria;**
- 3. Use evidence-based tools, such as the EMODE pet scoring system to determine suitability.**

### **Positive lists**

Currently, the CASR restricts or bans certain species, which is referred to as “negative listing.” In contrast, positive listing outlines species allowed to be kept as pets, with any species not listed considered prohibited.

A growing body of scientific literature, policy analyses, and government case studies conclude that a positive list approach is the most effective, precautionary, and scientifically grounded mechanism for addressing welfare issues, public health and safety threats, and ecological risks associated with exotic pet keeping.<sup>xix</sup>

The advantages attributed to positive lists include:

- Clear and simple: Unlike B.C.’s current list of 1,000+ prohibited species, positive lists are short and easy for the public to understand.

- Evidence-based: Only animals that meet criteria for welfare, safety, and environmental protection are included.
- Precautionary: Shifts the burden of proof to those wishing to keep or trade exotic animals, as in other regulated industries.
- Precedence: Positive lists have been developed in numerous jurisdictions, including Belgium, Luxembourg, Malta, Norway, the Netherlands, and New Brunswick.<sup>xx</sup>

### **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. This should include:

- Ability to meet species' behavioural, environmental, and dietary needs in captivity;
- Availability of qualified veterinary care within a reasonable distance;
- No significant zoonotic, injury, or ecological risks;
- Scientific evidence confirming the species' suitability for captivity (e.g. EMODE pet score).

### **Conclusion**

The review of the CASR offers a vital opportunity to address welfare, public health, and ecological risks posed by the exotic pet trade. Extending the scope of the proposed ban to consider all exotic species that do not thrive in human care and adopting an evidence-based positive list framework will create clear, enforceable rules that protect communities, ecosystems, and animals.

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