



Nancy Allan, Co-Founder and Chairperson
Manitoba Canary & Finch Club
524 Hethrington Ave, Winnipeg MB R3L 0V6
204-453-6654
Nancyaileen@live.com

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To: Councillor Sherri Rollins, Councillor Vivian Santos, Councillor Ross Eadie, Councillor Markus Chambers

CC: Public Engagement branch, Mayor Brian Bowman

Dear Councillors of the Standing Policy Committee on Protection, Community Services and Parks,

I am the Co-Founder and Chairperson for the Manitoba Canary & Finch Club (MCFC), a group that was founded in 1991. We are a vibrant club with over 50 active, long-term members. Our purpose is to bring people together who share a similar interest in aviculture. Since 1991 we have worked to foster appreciation for pet birds and responsible bird ownership through public awareness and education. We do not promote the competitive breeding or showing of captive birds. We view our birds as companion animals and pets and take great pride in upholding best practices in their care.

I am writing in response to the **Responsible Pet Ownership By-law Review** that was published on August 10th, 2021 by the City of Winnipeg Public Engagement branch. The stated purpose of the proposed by-law changes is to “keep both pets and the community safe.”

On May 10th 2021 the **Responsible Pet Ownership By-law Amendment** was introduced at the Standing Policy Committee on Protection, Community Services and Parks [session](#). During this session the Winnipeg Public Service was [directed](#) to review and report back to the appropriate Committee of Council, within 180 days, on a fuller review of the Responsible Pet Ownership Bylaw that includes a review of:

1. **Current use of animal traps within the City of Winnipeg**, including any type of trap that could cause injury or death to ensnared animals and any required by-law amendments to prohibit the use of traps within the City of Winnipeg that could cause harm to ensnared animals.
2. **Public Education on “wild-proofing” Urban Wildlife and co-existence techniques** to minimize conflicts with urban wildlife, and any required bylaw amendments.
3. **Dangerous Dog Designation**, focusing on responsible pet ownership including training, more options in failure to compliance, a ban on guard dogs; and strengthening the Responsible Pet Ownership with breed neutral language.
4. **Spay or Neuter, and Breeding** creating new guidelines and requirement of a pet license within the bylaw for breeders to ensure a history of responsible pet ownership and requirements of a letter from veterinarian; and any required by-law amendments to strengthen adherence of spay and neutering.
5. **Exotic Animals**; strengthen the bylaw with any required by-law amendments to mitigate impacts of pet hoarding, include a limitation, and prevent illegal disreputable trade of exotic animals.



6. That the Proper Officer of the City be authorized to do all things necessary to fulfill the intent of the foregoing.

I would like to draw attention to the section on **exotic animals** and how the intended purpose of the review does not align with what the Animal Services Special Agency has proposed and is hoping to pass this fall. Instead of addressing root causes of animal welfare that have led to hoarding, which has only occurred to date in infrequent cases, the city has proposed a blanket ban on all but two species of parrot (budgies and cockatiels) and has placed an arbitrary limit of 5 birds on households. Under the proposed by-law amendments, all common pet parrots such as parrotlets, lovebirds, conures, caiques, quakers, amazons, cockatoos, African greys, and macaws would be illegal to own. For aviary hobbyists, the variety of species would be limited to just 26 of over 52 types of captive finches and 1 variety of canary. The practice of breeding of any pet bird would be prohibited. Although current owners of banned species under this proposal would see their animals grandfathered, it would be illegal to rehome birds within city limits, presenting very real challenges that could threaten the safety and wellbeing of both people and pets. Impacts of these proposed by-laws for bird owners are sweeping and drastic and will adversely impact the entire bird owner community, vets who specialize in bird care, and pet stores that sell bird supplies. Rodent, reptile, amphibian, and insect owners are also similarly affected by changes on allowable species and number restrictions.

As for the City of Winnipeg's intention to create by-laws to "prevent illegal disreputable trade of exotic animals", the *Convention on International Trade in Endangered Species of Wild Fauna and Flora* (also known as [CITES](#)) has regulated the trapping and trade of wild populations of threatened and endangered species, and this includes all parrot species. This is an international treaty upon which Canada is signatory. As such, there are already mechanisms in Canada to prevent the illegal trade of wild-caught exotic animals. Federal laws and regulations related to the trade in exotic species are investigated and enforced by Environmental Enforcement Officers.

The Public Engagement branch states that the purpose of the proposal is to "...keep both pets and the community safe" and "...ensure that pets are properly cared for and not placed in at-risk scenarios." Under the exotics section, their primary reasons for banning ownership of species and placing limits of 5 animals is because:

1. Exotic animals are either poached from the wild or born in captivity
2. Exotic animals have little quality of life in captivity
3. There are currently no limits like dogs and cats, which can lead to hoarding
4. Stray exotic animals require law enforcement resources

I would like to address why each of these identified issues make the wrongful assumption that birds cannot be cared for properly and have no place in our society as pets and family members:

Exotic animals are either poached from the wild or born in captivity

Although it is true that every year millions of birds are captured from the wild are sold into markets around the world, presenting very real threats to populations and animal welfare, there is no evidence that the



City of Winnipeg is a hub for trafficking in illegal parrots, finches, and canaries for the pet trade. Not only is the import of wild-caught species federally regulated, but the domestic demand for wild-caught birds in Canada is negligible. This is primarily due to captive breeding efforts. Captive breeding of birds to supply a growing pet market both domestically and globally has been a primary factor in alleviating pressure on wild populations. Captive breeding of pet parrots, finches, canaries, doves, and pigeons necessary to continue to protect our wild populations and should not be a reason for banning the ownership of almost all species. These actions would likely result in the unintended consequence of increasing black-market demand.

Exotic animals have little quality of life in captivity

The city proposal states that the principles of animal welfare include the provision of food, water, and shelter and to ensure that pets are kept in good health, are able to express natural behaviours, and are not subjected to mental suffering. The city makes the incorrect assumption that almost all captive birds are incapable of having their welfare needs met. It also implies that those species seemingly arbitrarily put on the approved list are somehow easier to own or that their standard of care must be lower. This goes against the views of veterinarians, experts in avian care and husbandry, and prominent organizations representing the welfare of captive birds and other animals. Species like budgies and cockatiels are not disposable “starter pets” or easier to care for. Meeting their needs requires just as much care and attention as other species that would be banned. The vast majority of bird owners invest a great deal of time, energy, and research into caring for their companion animals and upholding best practices to ensure a good quality of life. It is an insult to thousands of families in Winnipeg that the blanket assumption is that they cannot provide for their pets and therefore should not be allowed to own them.

There are currently no limits like dogs and cats, which can lead to hoarding

Placing strict, arbitrary limits on the number of birds a person may own (max of 5 as stated in the proposal) makes no accommodations for the varied circumstances upon which the ownership of many birds is both practical and feasible while also detracting from the real issue of welfare. Hoarding should not be interpreted strictly as the number of animals a person owns, but rather the capacity a person or family has to be able to meet the welfare needs. For example, under the current proposal, a family may own 4 dogs, 2 cats, 5 birds, 5 reptiles, and 5 fish but could not own more than 5 birds even if they had no other types of animals. This is simply ridiculous. For those with budgie, finch, canary, and dove aviaries, their flocks would be illegal, and it would put an end to the future of the hobby and lifestyle.

MCFC’s position is in line with the American Society for the Prevention of Cruelty to Animals definition of animal hoarding*:

“Animal hoarding occurs when an individual is housing more animals than he or she can adequately care for. It is a complex issue that encompasses mental health, animal welfare and public safety concerns. Animal hoarding is defined by an inability to provide even minimal standards of nutrition, sanitation, shelter and veterinary care—often resulting in animal starvation, illness and death.”

*There is no definition for “pet or animal hoarding” in existing City of Winnipeg by-laws



Stray exotic animals require law enforcement resources

On August 12th we submitted a FIPPA request to the Animal Services Special Agency requesting statistics on the number of calls received and responded to annually from 2015 to 2020 for each family of exotics. This information is not publicly available, and no evidence was provided as to the draw on city resources in the proposal. I expect that calls to the agency regarding birds and other exotics to be negligible. In the last number of years, our members have personally responded to public requests for help retrieving lost parrots. In all cases birds were physically recovered by citizens with no assistance from the agency, although the agency was notified so that information on possible sightings could be passed to the owner. I believe that this reason for banning most bird species is low hanging fruit and will not stand up to scrutiny.

In conclusion, this proposal reflects how those at the Animal Services Special Agency have very little understanding of the exotics community and demonstrates a complete lack of respect for the values of bird owners in Winnipeg. The day this proposal was published brought immediate distress, fear, and worry to our entire community of parrot, finch, and canary owners who are underrepresented and were never consulted with in the early stages of this review. We did not even know the city was concerned with these issues. I can only imagine that those who own and have a passion for reptiles, amphibians, insects, and fish must feel similarly attacked and disrespected by this proposal. Providing the public with only 3 weeks to respond to something that would greatly impact their lives is also inconsiderate and unacceptable. It takes time to generate awareness of the proposed changes and gather feedback representative of the community. MCFC has tried to raise awareness for this issue by creating an [online petition](#) against these bylaw amendments.

MCFC and I implore that city councillors such as yourself critically examine the implications and far-reaching negative effects these bylaw amendments would impose on individuals and families who love and take great pride in the ownership and care of their pets. While MCFC would support a genuine effort to introduce bylaws that raise the minimum standards of care for birds in captivity, the current direction that this proposal has taken by banning and limiting ownership must be rejected. Addressing issues of animal hoarding and animal welfare through establishing minimum standards of care would require a much longer and detailed review and consultation process and more extensive by-law requirements than can be accommodated by this current process.

Please see my attached recommendations for the Public Engagement Branch on behalf of MCFC for how issues related to pet bird ownership in Winnipeg could be more appropriately addressed.

Sincerely,
Nancy Allan