



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: Public Engagement branch and the Winnipeg Animal Services Special Agency
Email: RPObylaw@winnipeg.ca

CC: Mayor Brian Bowman, Councillor Rollins, Councillor Santos, Councillor Eadie, Councillor Chambers

Re: Responsible Pet Ownership By-law Review

Dear Public Engagement Branch,

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.

Please refer to my attached letter to Councillor Rollins et al., that details MCFC's broader concerns and objections to the current *Responsible Pet Ownership By-law* amendment review currently available for public feedback. Here, the club will outline how the City of Winnipeg could more appropriately approach the issues of pet bird ownership, from the perspective of passionate bird owners. MCFC cares deeply about the welfare of captive birds and the conservation of wild species populations. As a result, I believe my recommendations on behalf of the club more accurately reflect the needs and considerations of the bird community and adequately address the concerns held by city in ordering this by-law review.

Recommendations for addressing issues of hoarding and the illegal disreputable trade of exotic animals:

Council Directive #1: Mitigate impacts of pet hoarding, including a limitation

Current Bylaw Proposal: Limit ownership of animals to 5 per animal "family"

Feedback & recommendation: There is no rationale in the proposal for how the limit of 5 was selected. This number has no apparent scientific or reasonable explanation and is therefore unacceptable. Limits on the number of birds (and other "exotics" such as reptiles and amphibians) an individual or family may own should be based on a defensible criterion that achieves minimum standards of care for pets and should not be chosen arbitrarily. The number of birds a person is capable of caring for varies greatly by household, species, and circumstance. Each case is unique, and by-laws must be able capable of accommodating a wide range of situations. Hoarding should not be based strictly on the number pets a



person owns, but rather the condition in which those animals are kept. 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."

*It should be noted that the City of Winnipeg's existing bylaw regulation does NOT define animal "hoarding". It is difficult to proceed with creating or recommending the creation of by-laws to address issues of hoarding when no definition exists.

Based on the 5 principles of animal welfare cited in the proposal, a welfare and criterion-based by-law* could mandate:

1. That all animals have access to clean water
2. All animals are fed a diet on a schedule that meets their nutritional needs
3. Minimum cage sizes for different size groups of animals (e.g., XS, S, M, L, XL sized birds) by animal family
4. Maximum animal densities for aviaries
5. Provision of cage accessories that meet basic needs for shelter, substrate, and the maintenance of good health
6. Provision of enrichment items and social interaction for the psychological well-being of animals

**An accompanying policy that refines these bylaws would have to be developed in conjunction with relevant stakeholders to determine acceptable practice*

By mandating minimum acceptable welfare standards, by-law officers and the Winnipeg Humane Society would have increased powers to prevent and effectively respond to cases of hoarding that stem directly from any exotic pets kept in poor conditions. These by-laws would also give officers the power to write warnings and order owners to comply as intermediate steps to more severe actions (e.g., the seizure of pets). Under this type of by-law, hoarding could be any number of animals and animal types.

If an arbitrary limit on animal ownership must be recommended to council as per the directive, I strongly advocate that the city err on the side of caution and set liberal limits on animal groups rather than families. For example, parrots should be limited to 20 birds while canaries and finches could be limited to any combination of 150 birds. It should be noted that hoarders who do not uphold good standards of care for their birds are likely to disregard any by-laws on limits anyway. Therefore, this by-law will disproportionately affect law abiding citizens who have existing high standards of care and should not be the target of such restrictive measures.



Council Directive #2: Prevent illegal disreputable trade of exotic animals

Current Bylaw Proposal: Broad bans on almost all exotic species, especially as it pertains to parrots, and blanket bans on the breeding of all exotic species.

Feedback & recommendation: I believe the original intent of this directive was to stem the movement of illegally wild-caught and imported animals for the pet trade. Restrictions on the movement and importation of wild-caught exotic species is already federally regulated, as Canada is a signatory to the *Convention on International Trade in Endangered Species of Wild Fauna and Flora* (also known as [CITES](#)). It is a wrongful assumption to make, particularly in regard to the keeping of parrots, that bird species are illegally imported and traded in Canada. In the last two decades or more, the captive breeding of birds in Canada has greatly removed demand for wild-caught animals trafficked in the black market. Captive bred birds make better companions than wild caught birds. The conservation of wild species is thereby supported by captive breeding. Breeding should continue to be supported in a safe and reputable manner to further remove the demand for illegally trafficked animals. By-laws that specifically address the issue of imported wild-caught animals would be more appropriate and widely supported. The by-laws on species bans are unnecessary because bird species kept as pets in Canada can be captive bred. For the reasons stated above, the captive breeding of pet birds should not be banned. In regard to finches, there are only 5 - 10 varieties of finch that are readily available in Manitoba. Most of the finch species currently listed as approved are not accessible or are ones we would not even consider keeping as they are not conducive to mixed aviaries.

Alternatively, By-laws could mandate:

- Breeders be registered with the city of Winnipeg and all chicks must be banded and registered with an approved bird organization or club
- At most, adopt legislation for exotics put in place in Saskatchewan in 2021:
 - Does not restrict the breeding of allowable exotic species
 - Allowed Species are the majority of members of the parrot family (e.g. cockatiels, parrots, budgies, lorries, cockatoos, macaws, parakeet, lorikeet, etc.). Finch, Canary, Pigeon and Dove species etc. kept by aviarists.
 - However, due to conservation concerns, more than 50 species of parrots are listed as Restricted: Division 2.
 - Division 2 lists species that may only be kept for personal possession by notifying the ministry. Banned animals under Division 2 can be grandfathered pets but otherwise not allowed to own. These include species of high conservation concern in the wild, species that are not found in the pet trade or are species exceptionally unsuitable for life in captivity (e.g., very large parrots).

Saskatchewan conducted more extensive consultation and more closely scrutinized what species were put on the Division 2 ban list than the City of Winnipeg is capable of doing in a few short weeks. Species on the Division 2 ban list in Saskatchewan are NOT commonly kept companion birds and therefore their ban does not adversely impact pet bird ownership.



Additional Concern Cited in Proposal: Stray exotic animals require law enforcement resources

Feedback & recommendation: There is no publicly available information to assess whether or not calls received and responded to by the Animal Services Special Agency are 1) increasing over time and 2) a disproportionate strain on agency resources. I find it hard to believe that calls related to birds, reptiles, insects, and fish amount to such high level of resources that it would warrant the city banning and limiting the ownership of almost all exotic species and completely eliminate certain hobby groups, such as finch and canary enthusiasts. If the city is disproportionately expending high levels of law enforcement resources on exotics, it would be more appropriate to implement a way of recuperating revenue rather than ripping apart the livelihoods and families of exotic pet owners.

By-laws could mandate:

- The registration of exotic pets
 - Should be proportional to the cost of administration.
 - Registration should not be per individual, but rather per family group, as it would be cost prohibitive and not make sense to register numerous birds in an aviary or numerous fish in a tank.

Registration would serve the purpose of helping the city track what species are kept in Winnipeg, how many there are, assist with locating owners of lost species, and assist with conflicting ownership claims when lost species are found.

Thank you for your consideration,

Nancy Allan
Co-Founder and Chairperson