



JUN 17 2024

Mr. Yves Giroux  
Parliamentary Budget Officer  
Office of the Parliamentary Budget Officer  
pbo-dpb@parl.gc.ca

Dear Mr. Giroux:

On behalf of the Honourable Steven Guilbeault, Minister of Environment and Climate Change, I am responding to your correspondence of June 5, 2024, requesting administrative data associated with administering the permit scheme under the *Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act* (WAPPRIITA) as well as estimates or administrative data on the costs to administer the permits associated with the import and possession of great apes and elephants (Information Request IR0786).

Please find attached the operational and salary costs associated with the WAPPRIITA permitting program for fiscal years 2018–2019 to 2022–2023. Please also find attached the estimated additional costs (operational and salary) for administering the new permitting requirements associated with the import and possession of great apes and elephants as specified under Bill S-15 as introduced.

Bill S-15 seeks to amend two existing federal statutes—the *Criminal Code* and WAPPRIITA—to phase out the import, export, breeding and keeping of elephants and great apes, with limited exceptions. Environment and Climate Change Canada does not currently have a mandate to protect animals in captivity and thus does not have expertise in this area. The Bill, insofar as it amends WAPPRIITA,<sup>1</sup> would therefore require a new program with new expertise.

First, a new program would be established for permitting and developing associated policies. The program would be responsible for issuing new federal permits for exceptions anticipated in Bill S-15 as introduced (i.e. captivity for

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<sup>1</sup> Bill S-241 also proposes amendments to the *Criminal Code*. Enforcement of those provisions (e.g. prohibitions related to keeping, breeding and entertainment) would be done by peace officers and provincial prosecutors as part of their broad responsibilities to enforce the *Criminal Code*.

conservation or scientific research programs, or if in the best interest of the animal) as well as for tracking new imports or existing animals currently in captivity. Expertise would be needed to develop policies to inform the evaluation and permitting of the Bill's proposed exceptions. Additionally, the program would incorporate new expertise for the ongoing monitoring of individuals or institutions that have exceptionally been given a license to hold an elephant or great ape in captivity. The new program would support compliance promotion at these facilities to ensure they are adhering to federal legislative obligations.

Second, as part of the Bill's implementation and building from the Department's existing software platform, a new tracking system to monitor legacy elephants and apes kept in captivity, with the intention to eventually phase out the keeping of these animals, will be developed. The estimated costs associated with development and ongoing data entry and maintenance of the new tracking system is attached.

Finally, Environment and Climate Change Canada enforcement officers designated under WAPPRIITA would similarly need to acquire relevant expertise and capacity (e.g. to enforce the new prohibitions under WAPPRIITA, investigate possible charges, and handle wild animals if needed). Enforcement officers would be responsible for verifying permit conditions and other operational activities such as inspections, investigations and seizure of illegal specimens.

Should you require further clarification, Environment and Climate Change Canada officials would be pleased to provide additional information.

Please accept my best regards.

Sincerely,



Jean-François Tremblay

Att.