



SEP 10 2023

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

Dear Mr. Giroux:

Thank you for your letter of August 10, 2023, requesting administrative data on the costs 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 start-up costs of implementing a new program. Please find attached the operational and salary costs associated with the WAPPRIITA permitting program for fiscal years 2018–2019 to 2021–2022.

Regarding the request for estimates or administrative data on the start-up costs associated with implementing a new program, please note that information on the start-up and maintenance costs of any new program cannot be developed until such time as the program's scope and mandate are determined.

However, with respect to a possible new program to implement Bill S-241, should it pass, I am pleased to share some considerations that would be required for the costing of this bill. Given the scope and complexity of the Bill, implementation would need to take into account a variety of factors.

Environment and Climate Change Canada does not currently have an animal welfare mandate and thus does not have expertise in this area. However, Bill S-241, insofar as it amends WAPPRIITA,¹ would create significant new responsibilities for the Minister of Environment and Climate Change. For example, given that the Bill lists more than 800 species of animals, many of which are commonly found in zoos, it would effectively require the Minister to assess, approve and oversee the operation of almost all zoos in Canada, unless those zoos are provincially licenced under the Act. Therefore, the Bill would require the creation of a new program with new expertise and associated resources at Environment and Climate Change Canada.

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

With respect to the acquisition of expertise, Bill S-241 addresses animals in captivity for animal welfare and public safety (i.e. dangerous animals) purposes with certain prohibitions (e.g. captivity, breeding, using the animal for entertainment purposes) and some exceptions (e.g. animals already in captivity, eligible animal care organizations, non-harmful scientific research and captivity in the best interests of the animal). Therefore, any implementing program would need to acquire personnel with appropriate expertise to develop associated policies for clearly defining the prohibitions (e.g. what constitutes “entertainment purposes”) and the application of exceptions (e.g. further interpreting and specifying criteria and standards for eligible animal care organization or non-harmful scientific research), as well as for advising the Governor in Council on additions and deletions to the Bill’s list of “designated animals” or the designation of “animal advocates.” There could be a large variance in incremental costs related to permitting and enforcement as species are added to the list of designated animals, since the costs would depend on the unique attributes of each species as well as its prevalence in Canada.

In addition, the new program would need to establish new data systems to address the lack of official and reliable data on the keeping of wild animals in Canada. According to some estimates, there are an estimated 1.4 million exotic pets in this country with the majority being reptiles and birds, and more than 340 000 being mammals (primarily wild cats and dogs). There are more than 100 facilities keeping wild animals in captivity. These facilities vary greatly in terms of size, sophistication, animals kept, and purpose (e.g. zoos and aquariums, rehabilitation centres or animal sanctuaries, science centres, museums and research centres). As such, more sophisticated information management processes would be required to monitor those species (of designated animals on Bill S-241’s list of more than 800) that are currently in captivity in Canada over their lifespans (which are variable and species-specific) and to track the issuance of any licensed exceptions.

The program would need to attain specific expertise and advisory capacity with respect to animal welfare in captivity. Welfare relates to the physical and mental state of an individual animal in relation to the conditions in which it lives. Thus, animal welfare standards, adaptability to captivity, and risk posed to public safety would need to be defined at the species level rather than broadly. Evaluation and permitting of Bill S-241’s proposed exceptions would require evaluating the conditions of captivity proposed for the individual animal. In this regard, the Bill’s inclusion of marine and aquatic species would require new expertise to advise on

implementation from Fisheries and Oceans Canada. Additionally, the program would need to incorporate expertise for the ongoing monitoring of individuals, institutions or animal care organizations that have exceptionally been given license to hold designated animals in captivity.

Environment and Climate Change Canada enforcement officers designated under WAPPRIITA would similarly need to acquire relevant expertise and capacity to enforce the new prohibitions, investigate possible charges, and handle wild animals if needed.

Please accept my best regards.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Hanson', is positioned above the typed name.

Lawrence Hanson
Acting Deputy Minister

Attachment