



WORLD  
**ANIMAL**  
PROTECTION

# Nothing new at the zoo

Increased oversight and regulations  
needed to protect captive wildlife in Ontario



Kangaroos are animals commonly kept at wildlife displays throughout the province despite being used to a warmer climate. (May 2022)

# Introduction

Animal welfare and public health and safety issues related to the keeping and use of wild animals in zoo-type facilities have been described and debated since the 1980s. To this day, Ontario continues to be the worst jurisdiction in Canada when it comes to ensuring the proper care of captive wildlife. It is far too easy for unqualified and untrained individuals to purchase wild, often potentially dangerous, animals, put them in small enclosures and advertise themselves as a zoo. Just this year, a zoo with more than 450 mainly wild animals<sup>i</sup>, in southwest Ontario was sold to individuals with seemingly little experience in exotic animal husbandry or operations related to running a zoo<sup>ii</sup>.

With few regulations in place, it is not surprising that there are more zoos, wildlife displays, and zoo-type exhibits housing exotic wild animals in Ontario than in any other jurisdiction in the country. Roadside zoos are substandard zoological facilities that mainly house wild animals in poor, barren conditions that typically consist of a range of small, ramshackle cages that offer little more than a water bowl, food bowl and a shelter box for each animal to sleep in. Deprived of opportunities to behave naturally, animals in these zoos often become bored and frustrated and can exhibit signs of psychological distress, including stereotypic behaviours. Additionally, most roadside zoos lack trained professional animal

care staff and the financial resources necessary to ensure proper animal care and housing.

In addition to animal welfare issues, there are significant public health and safety risks. It is still common to find tigers and other big cats kept behind fences that are only 3 meters high, a height that can be easily covered by a well-motivated wild cat. Equally as disturbing is the fact that most roadside zoo lack a perimeter fence that would prevent animals from leaving the facility grounds in the event of an escape and at the same time would prevent individuals from entering the facility unsupervised. From kangaroos<sup>iii</sup> to monkeys<sup>iv</sup> and lions<sup>v,vi</sup>, escapes from these types of facilities are not uncommon.

World Animal Protection is one of the leading organizations in Canada that has been on the forefront of the roadside zoo debate. With the publication of investigative reports in 1995<sup>vii</sup>, 1998<sup>viii</sup>, 2005<sup>ix</sup> and 2010<sup>x,xi</sup>, written in collaboration with Zoocheck, we have highlighted the animal welfare and public health and safety concerns. While several roadside zoos have closed since our last report in 2010, many of the zoos that have been subject to these investigations are still operating and, shockingly, have seemingly changed little.

# Background

In Ontario, exotic wild animals are legally permitted to be kept as pets, used for interactions with the public and are displayed in private and public zoos and zoo-type exhibits. These include potentially dangerous animals (e.g., big cats, giant constricting snakes) and animals that can pose significant safety and disease risks to people (e.g., primates, birds, reptiles) or native wildlife (e.g., frogs, turtles).

Few regulations exist related to the keeping of wild animals. The *Fish and Wildlife Conservation Act, 1997, S.O. 1997, c. 41*<sup>xii</sup>, pertaining to native wildlife species, stipulates that the keeping of live game wildlife or live specially protected wildlife is only possible with a licence and when in accordance with existing regulations (several exceptions do exist).

The *Provincial Animal Welfare Services Act, 2019, S.O. 2019, c. 13*<sup>xiii</sup> and in particular Ontario regulation 444/18: *Standards of Care and Administrative Requirements*<sup>xiv</sup> include standards of care for all animals and captive wildlife (several exemptions do exist).

However, Ontario is the last major jurisdiction in Canada that has not licensed or restricted the keeping or use of exotic wild animals in captivity. Instead, this continues to be the responsibility of individual municipalities, resulting in a patchwork of different bylaws across the province that leaves many animals and communities unprotected.

As the provincial government continues to delay the development and implementation of a comprehensive regulatory system

incidents and accidents continue to occur, including escapes and attacks. It leaves municipalities to deal with any issues and problems. This can result in a significant financial burden for municipalities, as staff must be trained, equipped and supported to carry out enforcement duties. There may also be substantive municipal resources attached to the prosecution of violators or to defend lawsuits brought by individuals who disagree with decisions made by the municipality related to their operations. Additionally, municipalities may be faced with the practical and financial burden of moving, housing and caring for wild animals.

Additionally, the seemingly limited enforcement of existing animal welfare regulations by the provincial government results in the continuation of animals being kept in small, sterile, and static environments. These conditions restrict natural movements and behaviours and can result in poor or diminished physical health and/or psychological/behavioural issues, including, but not limited to, lethargy, stereotypes, hyper-aggression, and other abnormal behaviours, and negative emotional states such as boredom, frustration, anxiety, and fear.

This report focusses on the Ontario Regulation 444/19 *Standards of Care and Administrative Requirements* and analyzes the animal welfare and public health and safety conditions at zoos, wildlife displays, and zoo-type exhibits according to existing standards. After visiting numerous roadside zoos and observing hundreds of enclosures, strong evidence exists that numerous provisions in the Ontario Regulation 444/19 *Standards of Care and Administrative Requirements* are not being complied with.

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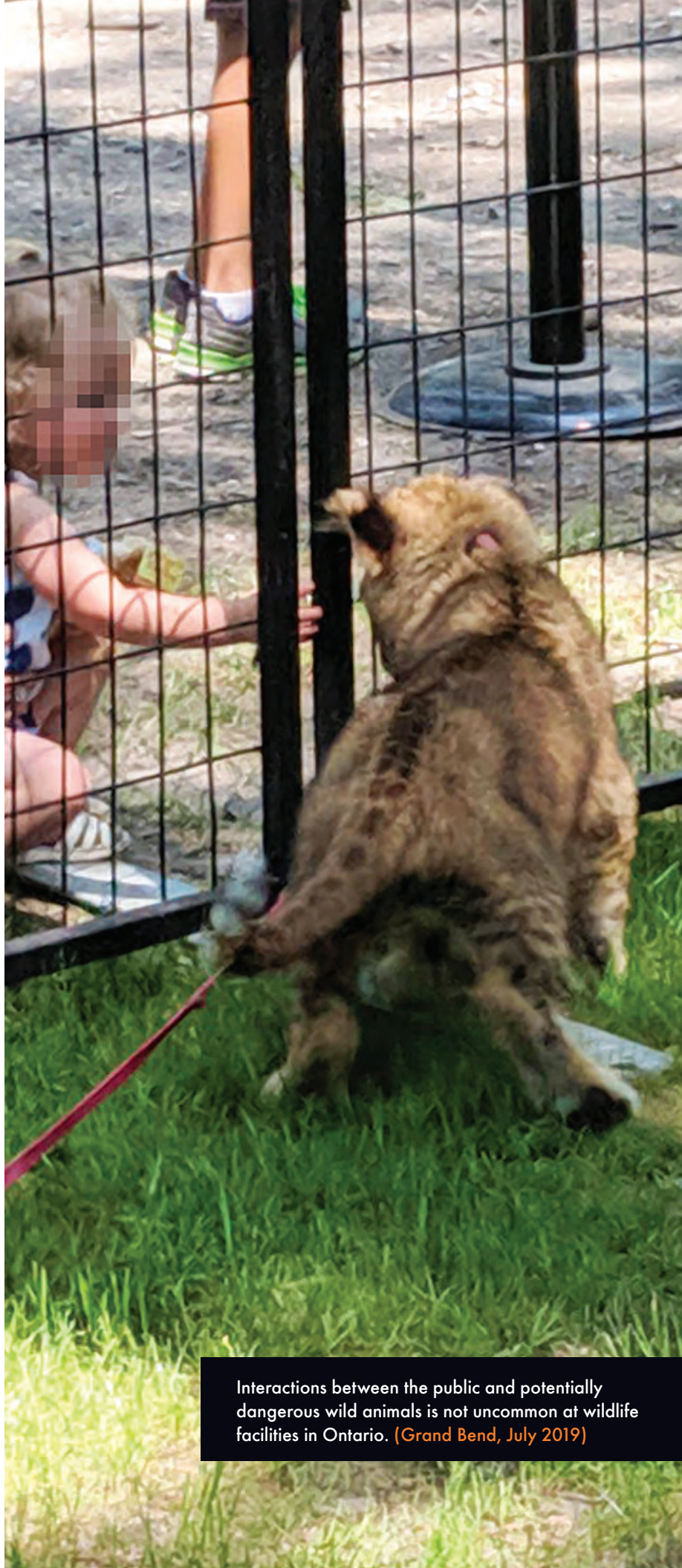
## Chairman of Canadian Exotic Animal Owner's Association killed by own tiger<sup>xv</sup>

On January 10, 2010, Norman Buwalda was killed by one of his pet tigers in the Township of Southwold, Ontario. For years, the residents of this community urged their local council to pass a bylaw to address the keeping of dangerous wild animals. When a tiger on the property attacked a 10-year-old boy in 2004, the local council finally acceded. However, Mr. Buwalda successfully fought to overturn the bylaw, only to get killed by his own tiger six years later.

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## Exotic animal owner's multiple attempts to open roadside zoo<sup>xvi</sup>

After numerous biting and scratching incidents, involving animals such as monkeys and a lynx at Ringtail Ranch and Rescue in Wainfleet, Niagara Region Public Health and the Township closed the facility to the public in 2016. Three years later, the owner of the wild animals opened another public facility, this time in Grand Bend. The controversial facility was shut down after a court ruled it was in violation of zoning bylaws. Not long after, the exotic animal collector and his lions and tigers appeared in Maynooth, Hastings County. While the facility did not stay open for long, it again sparked significant local opposition. It was only after the lions attacked and killed one of the tigers, that the animals were relocated by to an unknown location.



Interactions between the public and potentially dangerous wild animals is not uncommon at wildlife facilities in Ontario. (Grand Bend, July 2019)

# Methodology

Of the approximately 50 Ontario zoos, wildlife displays, and zoo-type exhibits housing wild animals, 11 were visited from May to August 2022 by experienced World Animal Protection staff, educated and trained in captive wildlife husbandry and welfare. During three of the visits, a second staff member joined to assist in data collection. The 11 facilities were selected based on their accessibility (i.e., open to the public), the size and variety of their animal collection and the absence of an official affiliation or recognition from a professional industry association. To obtain uninterrupted data collection, zoo owners and staff were not notified about visits. Instead, observers entered facilities after purchasing an admission ticket.

The 11 facilities (hereinafter referred to as “zoos”) that were visited were:

- Bervie Zoological Park, Kincardine
- Elmvale Jungle Zoo, Phelpston
- Greenview Aviaries Park & Zoo, Morpeth
- Jungle Cat World Wildlife Park, Orono
- The Killman Zoo, Caledonia
- Northern Exotics, Sudbury
- Oshawa Zoo & Fun Farm, Oshawa
- Papanack Park Zoo, Wendover
- Saunders Country Critters Zoo Sanctuary & Garden Center, Oxford Station
- Twin Valley Nature Park, Brantford
- Waddles’n’Wags Animal Haven, Eganville

General information about each facility was collected including the name, address, age of venue, type of ownership, opening hours, admission fees and any fee-based activities (e.g., animal feeding, wildlife meet-and-greets). This information was gathered through desktop research, publicly posted or distributed information (e.g., signs, brochures) provided at each facility as well as in conversations with zoo personnel. On the day of each observation, the weather conditions as well as the duration of the visits were recorded as well. During the facility visit, the number and types of animal species observed were recorded. The number and types of species not observed during the visit but nevertheless reported by the facility through enclosure signs or visitor information provided at the entrance, were documented separately.

In addition, observations were recorded of factors critical for meeting animal health and welfare and visitor health and safety standards as set out in the *Ontario Regulation 444/19 Standards of Care and Administrative Requirements made under the Provincial Animal Welfare Services Act*. Table 1 outlines and describes these factors that guided the observer in the data collection process.

**Table 1.** Animal welfare and public safety factors and description

<b>Category</b>	<b>Description</b>
<b>Appearance</b>	Body weight, visible injuries, condition of skin, fur, or feathers.
<b>Social environment</b>	Needs of social and solitary animals are met, including social animals being kept in natural groupings and group sizes.
<b>Enclosure size and space</b>	Outdoor and indoor space provision ranging from severely limited, moderately spaced to appropriate available space based on number of animals, behavioural preferences (e.g., arboreal species) and proximity to the public (i.e., respecting animal flight zone).
<b>Shelter and privacy</b>	Shelter from weather conditions and potential stressful situations (e.g., being viewed) accessible to all animals at the same time, if required. Including visual barriers that would allow animals to obtain privacy.
<b>Water availability and quality</b>	Unlimited access to clean, potable water for all animals within same enclosure.
<b>Environmental conditions</b>	Species are kept within natural temperature and humidity range and animals can resolve unpreferred or harmful environmental conditions. Natural circadian rhythm is possible.
<b>Animal entertainment</b>	The prevalence of interactions with the public through feeding, selfies, handling, touching, and riding or through shows where unnatural behaviours are displayed.
<b>Public safety</b>	Condition and materials of enclosure fencing; presence or absence of standoff barriers and perimeter fence around the facility. Enclosures are locked and inaccessible to the public and designed to prevent escapes considering animals natural abilities (e.g., climbing, digging, jumping). Prevalence or absence of hands-on animal-visitor interactions.
<b>Hygiene</b>	Unhygienic (e.g., garbage, rotten food, build-up of feces, algae growth in water sources), moderately clean, to clean.
<b>Enrichment</b>	Variety of strategies and tools used to encourage natural species-specific behaviours, ranging from no enrichment, structural enrichment to evidence of comprehensive enrichment program (e.g., replacement of items, use of food, sensory and temporal enrichment).
<b>Naturalness</b>	Ranging from fully artificial, semi-artificial to semi-wild to wild environments.
<b>Substrate</b>	Animals housed on natural substate that can be manipulated and allows for and encourages species-specific behaviours or absence thereof.



It is common to see children's toys being used as enrichment items for wild animals in zoo facilities in Canada. Enrichment items should be meaningful to an animal and be based on their specific physiological and psychological needs. (July 2022)



There are many provisions in the *Ontario Regulation 444/19 Standards of Care and Administrative Requirements* that apply to the keeping of wild animals in captivity. Five key provisions from the Regulation were used as the basis for this review. Any redundancies, (sub)provisions for which there was a lack of data or that were not applicable were removed. This resulted in the following list:

**PART II General Standards of Care for Animals, Basic Standards of Care for All Animals**

**3.(6)(b)** Every animal must be provided with adequate and appropriate sanitary conditions

**PART II Standards of Care for Captive Wildlife – Standards of care for captive wildlife**

**5.(3)** Wildlife kept in captivity must be kept in compatible social groups to ensure the general welfare of the individual animals and of the group and to ensure that each animal in the group is not at risk of injury or undue stress from dominant animals of the same or a different species

**PART II Standards of Care for Captive Wildlife – Standards for enclosures for captive wildlife**

**6.(1)** A pen or other enclosed structure or area for wildlife kept in captivity must be of an adequate and appropriate size

- (a) to facilitate and stimulate natural movement and behaviour (also mentioned in *General Standards of Care for Animals, Basic Standards of Care for All Animals 3.(6)(a)*)
- (b) to enable each animal in the pen or other enclosed structure or area to keep an adequate and appropriate distance from the other animals and people so that it is not psychologically stressed; and

**6.(2) A pen or other enclosed structure or area for wildlife kept in captivity must have:**

- (a) features and furnishings that facilitate and stimulate the natural movement and behaviour of each animal in the pen or other enclosed structure or area
- (b) shelter from the elements that can accommodate all the animals in the pen or other enclosed structure or area at the same time (also mentioned in *General Standards of Care for Animals, Basic Standards of Care for All Animals 3.(6)(e)*)
- (c) surfaces and other materials that accommodate the natural movement and behaviour of each animal in the pen or other enclosed structure or area
- (d) one or more areas that are out of view of spectators

**6.(4) A pen or other enclosed structure or area for wildlife kept in captivity and any gates or other barriers to it, including moats, must be designed, constructed, and locked or otherwise secured to prevent**

- (a) interaction with people that may be unsafe or inappropriate for the wildlife
- (b) animals escaping from the pen or other enclosed structure or area by climbing, jumping, digging, burrowing or any other means
- (c) animals or people, other than people who are required to enter the enclosure as part of their duties, from entering the pen or other enclosed structure or area by climbing, jumping, digging, burrowing or any other means

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These provisions are essential for safeguarding animal welfare and public safety at facilities keeping wild animals. Failing to comply with these provisions can result in severe animal suffering which often translates into displaying abnormal behaviours like feather plucking in parrots, self-mutilation (e.g., biting) in monkeys and pacing in cougars. It can also expose visitors and zoo employees to potentially dangerous situations with animals, especially when allowed to interact directly with wild animals, like hand-feeding monkeys.

# Results

Zoos, wildlife displays, and zoo-type exhibits in Ontario vary significantly in size, entry fee, visitor attendance and numbers and species of animals. The average entry fee for adults was \$18.40 (ranging from \$15 to \$22.95), visitor numbers at the time of entry varied between 1 to 200 people. The weather during the visits was fairly similar, with mostly sunny days, temperatures ranging between 25° C to 30° C and humidity from 45% to 75%.

In the 11 zoos that were visited, 1,033 individual wild animals were recorded and divided among 206 species, including several subspecies. There were 13 species of animals observed who could not be accurately identified (52 individual animals). For 26 species it was not possible to report the number of animals because they were not visible at the time of the visit, instead species information was collected based on cage signage. A summary of these results is provided in table 2.

Since the 11 zoos are only a sample of the total number of facilities in Ontario, the actual number of wild animals and species kept at all of Ontario's facilities will exceed the numbers stated in this report considerably.

## All zoos openly promoted direct or close visitor interactions with wild animals including but not limited to:

- Selling feed to visitors, for visitors to feed animals unsupervised (8 zoos).
- Allowing visitors to enter the animal enclosure (1 zoo).
- Lack of stand-off barriers, allowing visitors to come up to the enclosure fence (7 zoos).
- Staff spontaneously inviting visitors to touch/hold animals (2 zoos).
- Staff carrying baby animals while visitors were present (1 zoo).
- Pictures/images posted on website and/or in the zoo of staff/visitors interacting with wild animals (all zoos).
- Offering off-site activities with wild animals, also known as Mobile Live Animal Programs (at least 3 zoos).

**Table 2.** Summary of observed individual animals and species in the 11 visited zoos.

Category	Unidentified	# Species	% Species	#Individual animals	% Individual animals
Mammals	8	97	47.09%	671	64.96%
Birds	1	46	22.33%	259	25.07%
Reptiles	4	52	25.24%	90	8.71%
Amphibians	0	11	5.34%	13	1.26%

# General observations

**While the facilities outlined in this report vary in the way they operate, a number of reoccurring issues were encountered. A list of general observations is provided below:**

- Indoor enclosures were either absent, or not constructed to meet the needs of specific species. It would appear that many animals are either forced to spend winters in a barn or remain outdoors where they may only have access to small wooden or concrete dens. Many of the animals are from warmer or tropical climates (e.g., lions, many primates, parrots), and are not adapted to Canadian winters.
- Outdoor enclosures were generic spaces seemingly, designed for ease of viewing of the animals. There seemed to be little consideration for species-specific needs, whether it is providing opportunities to engage in their full behavioural repertoire or providing enrichment and/or husbandry routines that would address their psychological needs. For example, birds are often kept in enclosures that are too small to fly in, semi-aquatic snakes without access to water and primarily arboreal monkey species without adequate opportunity to climb.
- Food and water, in many cases, did not appear to be provided according to the individual needs of each species. For example, arboreal species were provided with food on the ground. Additionally, there is often only a single feed and water source, typically at the front of the enclosure, forcing animals to approach the public viewing area to access it.

Being forced to come close to people can be stressful to individual animals. They should, have the option to avoid public view without having to forfeit primary needs. Furthermore, providing one food or water source can be extremely problematic when multiple animals are housed in a single enclosure. Animals that are at the bottom of the hierarchy might not be able to access the primary source of food or water without risking conflict with other animals in the same enclosure.

- In addition to observing abnormal behaviours there were also visible pathways, indicating repetitive pacing behaviour, along enclosure fences of carnivorous animals like wolves, bears, tigers and lions in all the zoos. Pacing and other abnormal behaviours are usually indications that an animal is trying to cope with their surroundings while being unable to engage in their full range of natural behaviours.
- Most zoos appear to lack some of the standard security measures found in professional zoos. At some zoos, employees did not seem to have walkie-talkies, or a way to communicate directly to each other in the event of an emergency. Enclosures and pathways lacked lights, which would make any issues at night more challenging to address.

The remainder of this report will examine some of the existing provisions in the *Ontario Regulation 444/19 Standards of Care and Administrative Requirements* and provides commentary about whether or not the visited zoos seem to comply with them.



Animals from different regions and climates are kept in similar barren circumstances, despite having different physiological and psychological needs. (May 2022)



# PAWS Act Regulations Summary and evaluation



Crab-eating macaque kept in undersized and barren enclosure. (June 2022)

# Space

**Provision 6.(1)(a, b)** A pen or other enclosed structure or area for wildlife kept in captivity must be of an adequate and appropriate size to facilitate and stimulate natural movement and behaviour and for animals in the enclosure to keep an adequate and appropriate distance from the other animals and people so that it is not psychologically stressed.

Space allocation and design should be based on a number of factors<sup>xvii, xviii</sup>, including but not limited to:

- Whether an animal engages in arboreal, terrestrial, aquatic or fossorial movements and behaviours, or any combination thereof.
- Whether an animal is far-ranging, migratory and/or spends most of their day foraging.
- Whether an animal is exposed to multiple habitats and/or (micro)climates.
- The distance at which an animal attempts to move away when approached, or the distance required among animals to facilitate de-escalation of aggressive interindividual encounters (i.e., flight-zone).
- The number of animals in an enclosure.

Additionally, it is essential when animals share an enclosed space, that the space is large enough for each individual animal to engage in self-regulating behaviours at any point in time<sup>xix</sup>. For example, an enclosure with multiple animals should have multiple access points to drinking water, to prevent potential conflicts as well as provide subordinate animals with a safe option to access this resource. This applies to any resource including but not limited to food, shelter, resting spots, enrichment objects and furnishings, etc.

There is overwhelming evidence that enclosures in the zoos visited do not provide adequate space or are of an appropriate size to facilitate and stimulate natural behaviours. Nor do they seem to be designed with species-specific needs in mind. Below are several examples. It is important to note that these examples reflect the majority of enclosures observed, and that none of the reviewed facilities satisfied this provision adequately for every animal in their collection.

## Space

Enclosures do not provide adequate space, are of an appropriate size to facilitate and stimulate natural behaviours, or seem to be designed with species-specific needs in mind.



June 2022

### Yellow Anaconda

# of animals

1

Natural habitat:

swamps, marshlands

None of the 5 facilities that keep large constrictor snakes (e.g., anaconda, Burmese python, reticulated python), provided enough space for the animals to achieve straight line body postures. Accomplishing rectilinear body posture may be desirable for comfort, locomotion, thermoregulation, and other reasons<sup>xx, xxi</sup>. The space is severely restricted and prevents the animals from displaying their full range of natural movements and behaviours such as swimming and climbing. Additionally, the structural enhancements, furnishings and enrichment are rudimentary.

May 2022

### Black-and-white ruffed lemurs

# of animals

2

Natural habitat:

montane humid forests,  
deciduous forests

The space is severely restricted and prevents the animals from displaying their full range of natural movements and behaviours such as foraging, running and leaping from branch to branch. Additionally, the structural enhancements, furnishings and enrichment are rudimentary, and no privacy areas or visual barriers are provided should animals want to be outdoors but out of sight from other animals or visitors.



June 2022

## Parrots

# of animals

?

Natural habitat:

rainforests, savannas,  
grasslands

This enclosure complex is divided into three separate sections. **None provide ability for the parrots to engage in a full range of normal, species-specific movements and behaviours, including flight.** The enclosures are poorly outfitted and lack privacy areas that would allow the parrots to remove themselves from each others view.



May 2022

## Bobcats

# of animals

2

Natural habitat:

forests, swamplands,  
deserts

**Undersized enclosure that does not allow for normal movements and behaviours, including running at speed, leaping, and climbing.** The ceiling is low and the vertical space that is available, is underutilized. Structural enhancements, furnishings and other forms of enrichment are rudimentary or absent. There is also a lack of adequate privacy or shelter areas that would allow the animals to remove themselves from the view of each other or from visitors who can view the bobcats from all sides.



July 2022

## Tiger

# of animals

1

Natural habitat:

rain forests, grasslands,  
mangrove swamps

**Undersized enclosure that does not allow for normal movements and behaviours, including running at speed, leaping, climbing, and swimming.** There is essentially no available vertical space in this enclosure. Structural enhancements, furnishings and other forms of enrichment are rudimentary or absent. It lacks adequate privacy areas that would allow the animal to remove itself from the view of visitors and other predator species in adjacent and nearby enclosures.





Many of the few enrichment items provided in the zoos seemed to have little relevance for the animals living within the enclosure (Guiana brown Capuchin, June 2022)

# Enrichment

**Provision 6.(2)(a)** A pen or other enclosed structure or area for wildlife kept in captivity must have features, furnishings, surfaces and other materials that accommodate, facilitate and stimulate the natural movement and behaviour of each animal in the pen or other enclosed structure or area.

Sufficient space is a key prerequisite to ensure that appropriate features, furnishings, surfaces and other materials (also known as enrichment) can be provided to captive wild animals in order to accommodate, facilitate and stimulate natural movement and behaviour. Since most zoos fail the first provision i.e., providing sufficient and adequate space, they will also fail to meet this provision.

Similar to the space-provision, in order to provide adequate and appropriate enrichment several factors need to be considered<sup>xxii, xxiii</sup>, including but not limited to:

- Whether an animal engages in or a combination of arboreal, terrestrial, aquatic or fossorial movements and behaviours.
- The complete repertoire and range of natural behaviours.
- The natural habitat(s) the species occupies in the wild.
- The preferred circadian rhythm of animals (i.e., active at night, during the day or at dawn and dusk).
- Whether resources are provided in sufficient quantity for the numbers of animals in an enclosure.
- Measuring the impact of the enrichment on the animal's behaviour and adjusting the frequency and type of enrichment accordingly. This is also critical to prevent habituation of enrichment items which ultimately will reduce the stimulative impact an item can have on each animal's behaviour.

Enrichment is more than providing an animal with a car tire, hammock, or an elevated structure. While many enclosures at zoos have moveable (e.g., kid's toys), or unmoveable items (e.g., climbing structures) this should not automatically be interpreted as being functional or useful for the animals, since it does not necessarily accommodate, facilitate, or stimulate natural movements and behaviours.

## Enrichment

The presence of enrichment should not automatically be interpreted as being functional or useful for the animals, since it does not necessarily accommodate, facilitate, or stimulate natural movements and behaviours.



May 2022

### Alligator snapping turtle

# of animals : 1  
Natural habitat: slow moving water, heavy vegetation, muddy soils

Undersized tank that precludes engagement in a full range of normal movements and behaviours, including swimming and foraging. **Structural enhancements, furnishings and other enrichment is rudimentary and have little relevance to the animal.** Privacy areas that would allow the animal to remove themselves from the view of visitors are absent.



July 2022

### Red-and-green macaw

# of animals : 1  
Natural habitat: rainforest

Undersized enclosure that precludes engagement in a full range of normal movements and behaviours, including flying and foraging. **Structural enhancements, furnishings and other enrichment is rudimentary and have little relevance to the animal.** A lack of adequate privacy areas that would allow the animal to remove themselves from the view of visitors or from animals in nearby enclosures.

August 2022

## Lion

# of animals

2

Natural habitat:

grasslands, savannas,  
shrublands

Undersized enclosure that precludes engagement in a full range of normal movements and behaviours, including running, digging, foraging and climbing. Structural enhancements, furnishings and other enrichment is rudimentary and have little relevance to the animal. Furthermore, little shelter opportunities are provided.



June 2022

## African crested porcupine

# of animals

2

Natural habitat:

forests, mountains,  
sandhill deserts

Undersized enclosure that precludes engagement in a full range of normal movements and behaviours, including foraging. **These animals can have home ranges up to 91 hectares<sup>xxiv</sup>.** Structural enhancements, furnishings and other enrichment is rudimentary and have little relevance to the animal. A lack of adequate privacy areas that would allow the animal to remove themselves from the view of visitors or from animals in nearby enclosures.



June 2022

## Tegu lizard

# of animals

1

Natural habitat:

rainforest, swamps,  
meadows

In almost all zoos, the reptile enclosures are small, contain only basic furnishings and usually lack meaningful enrichment. **The keeping of this highly mobile, wide-ranging, and intelligent lizard in such an unnatural environment can have a detrimental impact on the health and welfare of the animal.**





Shelters were often absent or not appropriate for the species inhabiting the enclosure. (June 2022)

# Shelter

**Provision 6.(2)(b, d)** A pen or other enclosed structure or area for wildlife kept in captivity must have shelter from the elements that can accommodate all the animals in the pen or other enclosed structure or area at the same time and must have one or more areas that are out of view of spectators.

Captivity inherently limits opportunities for wild animals to respond to stressors or perceived threats as they would in the wild. It is therefore essential to provide each individual animal with sufficient opportunities to regulate their responses as required. This includes self-regulation of temperature (e.g., moving in and out of the sun) and being able to seek safety and security by moving away from enclosure counterparts, animals in other enclosures and the public when needed. Barriers that provide shade, as well as visible barriers which would allow the animal to feel secure are essential to achieve good animal welfare.

In order to provide adequate and appropriate shelter, several factors need to be considered<sup>xxx</sup>, including but not limited to:

- Whether an animal engages in arboreal, terrestrial, aquatic or fossorial movements and behaviours or a combination thereof.
- The complete repertoire and range of natural behaviours.
- Whether an animal is a predator, prey or both.
- The number of animals in an enclosure and ensuring that all animals have access to shelter without having to compete to access it.

As with previous provisions, in most cases the zoos did not seem to be in compliance with this provision either. A variety of images are included as examples on the following pages.

## Shelter

Captivity inherently limits opportunities for wild animals to respond to stressors or perceived threats as they would in the wild. It is therefore essential to provide each individual animal with sufficient opportunities to regulate their responses.



June 2022

### Lions

# of animals : 2  
Natural habitat: grasslands, savannas, shrublands

These lions only have two opportunities (under the platform and their indoor sleeping box) to avoid direct sun or other weather events like rain or snow. Compounding the issue is that indoor areas at these types of facilities are usually not regulated for temperature, humidity, or ventilation, making indoor areas possibly uncomfortable to spend large amounts of time in during warmer weather. Multiple areas of shade should be created to give the lions the opportunity to choose whether to seek shelter as a pair or individually and to provide them with the option to choose their preferred substrate-type as well.



May 2022

### Tigers

# of animals : 2  
Natural habitat: rainforests, grasslands, mangrove swamps

Undersized enclosure that precludes engagement in a full range of normal movements and behaviours, including foraging, climbing, and swimming. Structural enhancements, furnishings and other enrichment is rudimentary and have little relevance to the animal. A lack of adequate privacy areas that would allow the animals to remove themselves from the view of visitors or conspecifics. **Other than beneath the platform, no shelter from the sun or precipitation is provided.**



June 2022

## Saharan spiny-tailed lizard

# of animals

3

Natural habitat:

rocky, semi-rocky desert areas

At this facility, the tank is located at the bottom of a display wall. Looking down on animals, especially prey animals, can be perceived as threatening. **This species is known to be solitary and territorial<sup>xxvi</sup>. Sharing a small space might cause conflict and increase overall stress levels.** Furthermore, there is only one heat lamp which can further increase competition and conflict. Temperature and access to UVA and UVB radiation are crucial for the health of reptiles. Finally, the size of this tank does not likely allow for the necessary temperature gradients..



June 2022

## Blue-and-yellow macaws

# of animals

2

Natural habitat:

rainforest

**There is a lack of shelter options available to the animals.** Shade is only provided in the left rear corner. Additionally, this enclosure lacks visual barriers that would allow the birds to remove themselves from the view of the public, each other or from animals in adjacent enclosures.



June 2022

## Giraffes

# of animals

5

Natural habitat:

semi-arid savanna,  
savanna woodlands

**While the enclosure might appear to be spacious, there is only one area that provides shelter from elements.** The only shade or cover from precipitation is provided by the structure on the left. Additionally, in winter, the giraffes are likely confined in the barn, visible in the back of the picture. The barn does not seem to be very spacious considering it has to house five individual giraffes.





It is not uncommon to see social animals being housed alone at wildlife facilities in Ontario. (July 2022)

# Social and solitary housing

**Provision 5.(3)** Wildlife kept in captivity must be kept in compatible social groups to ensure the general welfare of the individual animals and of the group and to ensure that each animal in the group is not at risk of injury or undue stress from dominant animals of the same or a different species.

Ensuring that animals are housed in appropriate and compatible social groups is a challenge for many captive wildlife facilities. The social preferences of individual species are important to consider, since failing to meet these can result in severe behavioural and psychological issues, like elevated aggression between conspecifics housed together<sup>xvii</sup>. Additionally, small enclosure spaces are not appropriate for the housing of larger groups of animals.

Breeding and other husbandry practices can also impact the stability of social groups. Examples include the removal

of young animals from their mothers, the trading of animals among zoos and thereby changing the social dynamics of the particular groups animals were removed from, the separation of males and females to prevent breeding, and the solitary keeping of animals that might not be solitary in the wild (e.g., certain reptile species).

One of the most problematic practices is the housing of social animals in solitary confinement. There were numerous zoos that housed primates, birds and other well-known social species solitary. The following pages have some examples.

## Social and solitary housing

One of the most problematic practices is the housing of social animals in solitary confinement.



June 2022

### American crocodile

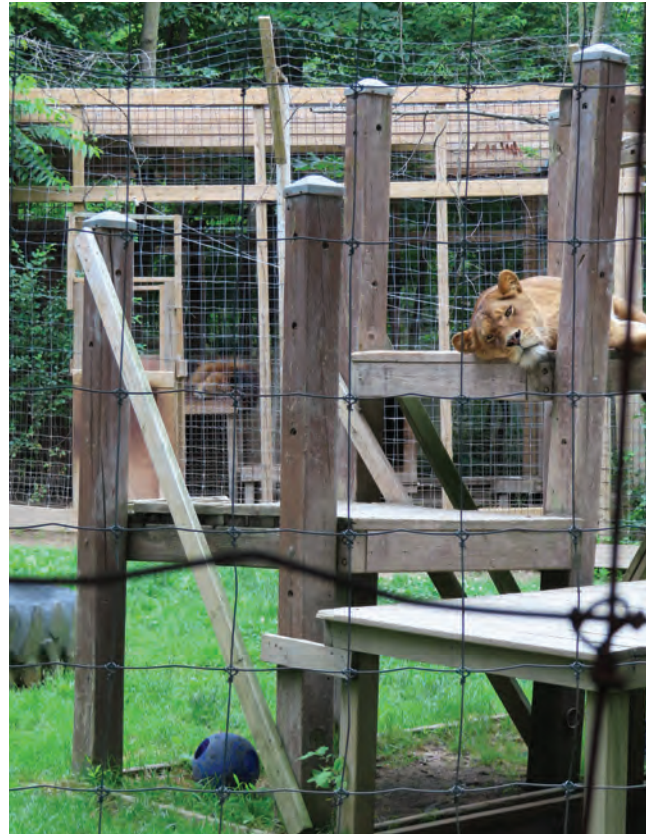
# of animals

1

Natural habitat:

mangrove swamps

Crocodylians are one of the most social reptile species<sup>xxvii, xxix, xxx</sup>. While they might not form stable social groups, they are known to congregate in large numbers, have a hierarchy, and sometimes hunt together..



July 2022

### Lions

# of animals

1

Natural habitat:

grasslands, savannas, shrublands

Lions are one of the few wild cat species that are known to be social. The size of a pride varies anywhere from 2 to 40 individual lions and consist of related females with the males coming and going as they get challenged for control of the pride<sup>xxxi</sup>. Females tend to never be alone and stay with the same pride their entire lives. This zoo houses most of their lions individually. While the animals can see each other and perhaps have some interaction through the enclosure fence, meaningful social interactions, or opportunities to form a pride are not provided.

June 2022

## Capuchin monkey

# of animals

1

Natural habitat:

rainforest

In the wild, this species of monkey lives in groups up to 35 individuals and rely on social interactions for their physical and psychological health. At this zoo, the animal is housed alone.



June 2022

## Japanese macaque

# of animals

1

Natural habitat:

deciduous forests

This species of primate is highly active, exceptionally social, very intelligent and, in the wild, lives in troops ranging from 10 to 160 individuals. At this zoo, the animal is socially isolated.



May 2022

## Harris's hawk

# of animals

1

Natural habitat:

sparse woodland,  
semi-desert, marshes

These species are one of the few highly social raptors. They form complex social groups with a strict hierarchy. Social behaviours include cooperative hunting, defending territories and protecting each other's nests<sup>xxxii</sup>.





Dirty water and accumulation of fur, feathers and other materials was problematic in some zoos. (June 2022)

# Sanitary environment

**Provision 3.(6)(b) Every animal must be provided with adequate and appropriate sanitary conditions**

Pathogen buildup is more likely in enclosed conditions where animals eat, sleep, and defecate in areas often close to each other. Additionally, animals that are stressed (e.g., because of inappropriate housing conditions) can have compromised

immune systems making them more prone to contract and transmit diseases<sup>xxxii</sup>. Applying husbandry practices to ensure adequate and appropriate sanitary conditions is in the best interest of the animals, people working at the facility and visitors.

## Sanitary environment

Pathogen buildup is more likely in enclosed conditions where animals eat, sleep, and defecate in areas often close to each other.



June 2022

At this zoo in particular, many examples were found of old, rotting food or food being near to or contaminated by animal droppings.



June 2022

In this enclosure feed is provided in a wooden container. Wood is very difficult, if not impossible to keep clean. In this case, it doesn't look like the container has been thoroughly cleaned in some time. New food seems to be piled onto old straw, food, and animal droppings.



June 2022

## Lion-tailed macaque

# of animals : Natural habitat:  
10 : semi-evergreen rainforests,  
monsoon forests

The provision of sufficient, clean water that is accessible 24-hours per day to all animals within an enclosure is an area of concern for most of the zoos due to the lack of automated drinking systems. This means that water sources need to be checked, cleaned and refilled manually on a daily basis. The amount of labour spent on water provision, especially during hot days or days when the water freezes over must be significant. Stagnant water sources, especially in the summer can be a breeding ground for mosquitoes, algae and other microorganisms, which can cause illness in animals and people. Animals without clean or any drinking water were observed across zoos.



June 2022

## Foxes

# of animals : Natural habitat:  
3 : forested areas,  
grasslands, deserts

Remains of previous feeding sessions, including feathers and bones, are visible. Also, the wooden sleeping den and other wooden materials in the enclosure are weathered. If wood is not taken care of properly it will rot which can make the enclosure unsafe.



June 2022

## Japanese macaque

# of animals : Natural habitat:  
2 : deciduous forests

Accumulation of animal droppings were visible in multiple enclosures in different zoos, indicating that the enclosures have likely not been cleaned for some time.





It is not uncommon to see potentially dangerous animals behind inappropriate fencing. Professional standards for the keeping bears (e.g., Global Federation of Animal Sanctuaries) prescribes rigid woven wire mesh, or heavy mesh to be used as fence. (May 2022)

# Dangerous enclosures and interactions

**Provision 6.(4)(a, c)** A pen or other enclosed structure or area for wildlife kept in captivity and any gates or other barriers to it, including moats, must be designed, constructed and locked or otherwise secured to prevent interaction with people that may be unsafe or inappropriate for the wildlife, including preventing the entry of people into the enclosure.

The *Standards of Care and Administrative Requirements regulations*, in addition to animal health and welfare provisions, also includes provisions that are aimed at keeping zoo personnel and the public safe from captive wild animals. While few prescriptive standards are provided in the *Regulations*, information about suitable building materials, safety barriers and other measures that should be taken to prevent unsafe interaction between animals and visitors is widely available in academic and popular literature including online<sup>xxiv, xxxv</sup>.

Unfortunately, professional safety standards seem not to be incorporated at many of the zoos. In the past, animal escapes and other incidents have occurred (including at some of the zoos that were visited) putting staff and visitors at risk. Given current conditions, accidents may continue to happen in the future. The following pages have some examples of safety concerns that were observed.

## Dangerous enclosures and interactions

Professional safety standards seem not to be incorporated at many of the zoos.



August 2022

### Lion

# of animals

1

Natural habitat:

grasslands, savannas,  
shrublands

This enclosure lacked a stand-off barrier so visitors and/or trespassers would be able to come within touching distance of the lion. The facility itself also lacks a perimeter fence which would allow people from entering the property unsupervised and have access to potentially very dangerous animals.



June 2022

### Tiger

# of animals

?

Natural habitat:

rainforests, grasslands,  
mangrove swamps

This door provides entry to the indoor area of the tiger enclosure. At the time of the observation this was seemingly the only latch being used. While there is an enclosure between the visitor walking path (from which the picture was taken) and the indoor den, the lack of secure locks on a tiger enclosure is troubling.

June 2022

## Ring-tailed lemurs

# of animals

5

Natural habitat:

montane humid forests,  
deciduous forests

This enclosure lacks a stand-off barrier (i.e., a barrier that would ensure a safe distance is maintained between the public and the enclosure fence). Lemurs can pose a hazard to visitors due to very fast movement and extremely sharp teeth.

**Incidents between visitors and lemurs have been reported in the past in Ontario, and just recently in March 2022 a lemur attack resulted in the hospitalization of a toddler in Georgia, USA.**<sup>xxxvi</sup>



June 2022

## American Crocodile

# of animals

1

Natural habitat:

mangrove swamps

Interaction with wild animals can be stressful to the animal, especially when the interaction is involuntary. For example, when this American crocodile was taken from the enclosure, the animal was resisting being captured, taken out of the water, and being handled. **Regardless of the size of the animal, the force with which it can bite could still inflict significant damage to a person.**



June 2022

## All animals in facility

# of animals

450

Natural habitat:

various

**Most of the zoos did not have an appropriate perimeter fence that would prevent animals from leaving the facility grounds in the event of an escape and prevent individuals from entering the facility unsupervised.** This picture is an example; the zoo grounds with the animal enclosures are to the left (the fence is part of the wolf enclosure).



## Dangerous enclosures and interactions

**Provision 6.(4)(b)** A pen or other enclosed structure or area for wildlife kept in captivity and any gates or other barriers to it, including moats, must be designed, constructed and locked or otherwise secured to prevent animals escaping from the pen or other enclosed structure or area by climbing, jumping, digging, burrowing or any other means.

The need for properly designed and constructed enclosures to prevent animals from escaping should be seen in unison with the previous provision. Minimum safety standards are widely available since many jurisdictions and zoo associations [e.g., Association of Zoos & Aquariums (AZA)] set minimum

requirements to mitigate public and employee health and safety risks. The lack of prescriptive safety standards in Ontario has resulted in the keeping of potentially very dangerous animals in inappropriate enclosures. Some examples are provided below.



May 2022

### Lions

# of animals : 3  
Natural habitat: grasslands, savannas, shrublands

The fencing for this enclosure is too low (this fence is estimated to be lower than 3 meters) and lacks an inwardly angled overhang at the top. Professional lion fencing standards stipulate a minimum height of 4.5 meters and include an additional overhang. This fence features several strands of hot (electric) wires, but this does not omit the need for a robust, properly designed and constructed fence of sufficient height with an overhang.



June 2022

### Tiger

# of animals : 3  
Natural habitat: rainforests, grasslands, mangrove swamps

This enclosure is unsafe and immediate action should be taken to safeguard visitors and employees. Tigers have escaped from enclosures with fences higher than 4 meters (this fence is estimated to be 3 meters at the most). Professional tiger fencing standards require a minimum height of 4.8 meters, including a 1-meter overhang turned inward at a 45° angle. Other considerations should include minimum standards related to fence materials (i.e., thickness of mesh), as well as the distance between vertical and horizontal support beams.

June 2022

## Lions

# of animals

2

Natural habitat:

grasslands, savannas,  
shrublands

Appropriate fence height should include considerations related to the structures within an enclosure and the impact they might have on the ability for an animal to escape. This picture shows that platforms and other furnishings can significantly reduce the distance between the animal and the top of the fence. Additionally, this enclosure fence is too low and lacks an overhang.



June 2022

## American crocodile

# of animals

1

Natural habitat:

mangrove swamps

At the time of the visit, this human swimming pool was used as an enclosure. The shoddy fence construction creates a potential public safety and escape risk.



July 2022

## Lions

# of animals

2

Natural habitat:

grasslands, savannas,  
shrublands

There is no proper overhang, and the top of the fence is crooked, with branches leaning over it. The amount of space between the wires as well as the thickness of the fence does not meet professional zoo safety standards. **It would be possible for the animals to reach through the fence.** Attacks through fences have been widely reported on, including in Ontario.





Black-and-white ruffed lemur at a roadside zoo in Ontario.  
(June 2022)



# Summary and recommendations

Ontario is one of the few provinces in Canada that does not comprehensively restrict or regulate the trade, use and keeping of (exotic) wild animals. At the time of writing, it is possible to buy, open and operate a facility with wild animals without having any relevant knowledge, experience, or training. Furthermore, zoos are allowed to continue operating despite seemingly being in violation of one or more existing provisions in the *Ontario Regulation 444/19 Standards of Care and Administrative Requirements*.

While only 11 facilities have been reviewed for this report, it is important to note that the identified issues are not exclusive to these facilities but are common across similar zoo-type facilities in Ontario.

Times are changing. In 2020, the Government of Ontario implemented the Provincial Animal Welfare Services (PAWS) Act which allows for the establishment of new regulations to restrict the keeping of wild (exotic) animals that pose an undue risk to human safety or cannot be humanely kept. Ontarians are supportive of government measures. A 2022 Nanos poll showed that 88% of Ontarians support provincial regulations that would

require all zoos to have a licence and to meet animal welfare and public safety standards, and 72% support regulations prohibiting zoos from offering close interactions with wild animals.

## We recommend the Government of Ontario:

- **Require enforcement officers to conduct comprehensive reviews of all Ontario zoos to identify violations of the PAWS Act standards and take appropriate measures to address them.**
- **Develop and implement a mandatory licencing program for all facilities, businesses, and institutions housing native and exotic wild animals.**
- **Implement a possession, breeding and acquisition ban on facilities, businesses and institutions that do not meet licencing standards.**
- **Prohibit the use of wild animals for entertainment as well as the possession, keeping and breeding of dangerous and/or problematic wild animals by private individuals.**



.....

**It is clear that simply having basic regulations on the books is not enough to keep communities safe or give captive wildlife any kind of life worth living – without proper enforcement and without working towards a future where wild animals can live their best lives. Ontarians deserve better and so do the animals currently kept in these places.**

**Ontarians want to see their government act. Phasing-out roadside zoos is the most effective approach to protect animals. Measures like these will also protect the public, communities, first-responders and others impacted by escapes, attacks and other incidents. World Animal Protection is a ready and willing partner in forging a safer and more humane future for us all.**

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Birds of prey kept at Ontario roadside zoos, like this red-tailed hawk, typically lack sufficient vertical and horizontal space to move about freely and normally and reduce stress. (May 2022)

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