

Comments to:

Wildlife Act Review Project  
Fish and Wildlife Branch  
Ministry of Environment  
P.O. Box 9374 STN PROV GOVT  
Victoria, BC V8W 9M4

Pat Bell  
Minister of Agriculture and Lands  
P.O. Box 9043 STN PROV GOVT  
Victoria, BC V8W 9E2

Barry Penner  
Minister of Environment  
P.O. Box 9047 STN PROV GOVT  
Victoria, BC V8W 9E2

Regulations to prohibit the  
private ownership of certain non-  
domestic (exotic) animals in BC

These comments I am filling are to address my concerns over which changes to the Current Wildlife Act review to be introduced to the Legislature in 2008 are being pushed through by the BC SPCA (BC Society of the Prevention of Cruelty to Animals). They will statistically prove that some of the changes they are trying to push through will have virtually no positive effect on public safety here in BC, and why I feel they are a violation of our rights of freedom. Furthermore, I will be addressing some of the misconceptions that the BC SPCA has been spreading around to unfairly target private owners here in BC. Also I will be addressing my concerns regarding that if these laws are passed, that they would have a terribly negative effect on not only private exotic animals owners here in BC, but for the animals themselves.

#### ABOUT MYSELF

Hello, My name is Walter Rabey. I do not at this point in time own any of the animals that would be prohibited from private possession from these proposed rules. Sometime in the future if the conditions allow it, it may be something that I would consider doing. This is something however that I would only do if I am able to provide the proper facilities for the animals that I would be willing to care for. I believe that private ownership of exotic animals, (just as many other personal occupations, I will address this later in my comments) is a right that the people of British Columbia should be entitled to and should be protected. The exotic felines to me, are some of the most magnificent creatures that we share our world with, and I also believe that many are in danger from extinction in the wild, and that captive breeding (both private and commercial) is their only realistic hope for long term survival. That being said, lets examine some of the changes to the Wildlife Act that the BC SPCA is trying to push through, and have a look at the long term effects they would have on private owners, and the animals themselves in captivity here in British Columbia.

## THE WILDLIFE ACT REVIEW AND PREPOSED CHANGES

It has been some 25 years according to the BC government sense the Wildlife Act has gone over any significant Review and had any major changes made to it. Now I will get straight to the point here. Back in May of this year, there was a very unusual tragic accident that occurred at a private facility called SiberianMagic, owned by Kim Carlton. Kim's fiancée was over at his facility, and while near a tiger's enclosure, had her dress clawed at by the tiger, which hit her artery and she bled to death. As soon as this event occurred, the local AR (animal rights) groups and media here went straight into overdrive to call for a ban on the private ownership of exotic animals. Later in these comments, we will examine this issue here and see exactly what role it is playing in these proposed rules.

The changes that the BC SPCA is calling for in the Wildlife Act are found here in this PDF document off their website:

[http://www.sPCA.bc.ca/WildlifeAct/SubmissionPackage/BC%20SPCA\\_Wildlife%20%20Act\\_Submission.pdf](http://www.sPCA.bc.ca/WildlifeAct/SubmissionPackage/BC%20SPCA_Wildlife%20%20Act_Submission.pdf)

## MISCONCEPTIONS?

From the SPCA Wildlife Submission package

The BC SPCA strongly recommends an amendment to the definition of wildlife as contained in the wildlife Act in order to ensure appropriate consideration and protection for the role of exotic species in BC and provide effective legislative authority for all wild animals (native and, non-native and exotic) currently in BC and those that may arrive in the future.

I find it highly questionable how exactly these proposed rules that I will be highlighting, will in any way aid in protection of exotic wildlife kept in captivity here in BC. As I will be pointing out, they will do almost nothing other than prevent a statistically very, very, small portion of human deaths, cause unnecessary emotional harm for private owners and their animals here in British Columbia, and will do absolutely nothing to improve public safety as they are trying to lead the BC government to believe. That being said, lets further go into their submission package and examine.

From the SPCA Wildlife Submission package

Exotic wildlife = Non-domesticated and non-indigenous species captured from the wild outside of Canada, or since captive-bred, and that do not naturally exist anywhere in the wild of Canada' these species have been imported generally by the pet and entertainment industries.

Domestic animal = Species that have been selectively bred by humans over hundreds and often thousands of generations, in order to alter their genetics to create animals that are dependant, docile, predictable, and controllable, and no longer occupy and ecological niche in the wild.

The comparison between these two definitions is one of the most classical and first choices of the AR agenda as an excuse to why private owners should not be allowed to own exotic animals. I will statistically prove here that the statement made by the BC SPCA regarding "domestic animals" is partially false. Domestic animals because of our work over long periods as humans, need us to ensure that they can survive into the future. Without us, they would not survive. That part is true. But what does this have to do with being "predictable and controllable", at least to the degree they think? If we are to believe this statement made by the BC SPCA regarding domestic animals, then why is it that according to the US Centers for Disease control and Prevention, that about 4.7 million Americans in the United States each year are bitten by dogs, and that nearly 800,000 of the victims seek medical attention, and that around 12 are killed?[1] Im quite sure that if the executives at the BC SPCA were really honest, they could tell of quite a few stories about them dealing with or knowing about domestic dog related injuries that happened at some point their lifetime. The above statement from the BC SPCA is just to try and make our government believe that domestic animals here in British Columbia do not pose any safety risk, and that exotic animals do. As I will prove later, this is simply not true. All living creatures (including the human being) can never be "predictable and controllable", and it is unfair to discriminate captive exotic animals in this area, without having any facts to prove it.

Currently under the Wildlife Act, all exotic animals such as tigers, lions, primates, crocodiles, venomous snakes, etc. that are kept as pets and/or are on public display, are considered domestic animals. Despite the fact that these animals pose a serious physical threat, are vectors of zoonotic diseases, and very few facilities have adequate housing and care standards, there are no current legal means by which the Ministry of Environment (MOE) can regulate their possession, breeding, sale or transfer within BC. The current definition of wildlife in the Act includes raptors, threatened species, endangered species, game or other species of vertebrates prescribed as wildlife and, for the purpose of several sections, includes fish.

This is the part of the submission package where all the trouble and misconceptions begin to start. All animals, domestic and exotic, all deserve proper welfare standards to ensure that they are being kept and cared for in a humane way, and I by no means have any problem supporting fair regulations to make sure that these needs are met. However, the BC SPCA is taking this to a far too extreme level, and their statements involving exotic animals being prohibitively difficult to care for, are not true. This is pure 100% AR (animal rights) propaganda, in their agenda to end the private ownership of exotic animals. The BC SPCA (and all other animal rights groups who oppose the private and/or commercial

keeping wildlife in captivity) in case you are wondering, and probably haven't noticed, do not have any proper statistics at all to properly back up the laws that they are trying to push through. The specific points I am highlighting from their submission package are ultimately just a collection of emotions and paragraphs with no proper cited facts.

A small group of private owners in the US run a website [www.rexano.org](http://www.rexano.org) . REXANO is a free web resource that provides a free source of info, statistics, and detailed articles on responsible exotic animal ownership, and is worth checking out. They recently this summer sent a message to the US Centers for Disease Control and Prevention asking if they have any record of disease transmission from non human primates to humans in all of the United States (this is around 300 million people remember). Their answer was that there have been some cases of Herpes B virus and some documented infections of simian immunodeficiency virus (SIV), Simian foamy virus, and Ebola Reston, but none of these have actually caused disease[2]. Is this something that we saw the BC SPCA mention in their submission package? I think not.

One of the favorite targets for disease by the AR movement are salmonella infections associated with captive reptiles, making them seem as if they are an enormous public safety hazard. So is this true or not? Lets have a look. REXANO.org posted on their site, an extensive study from the US Centers for Disease and Prevention on Reptiles, Amphibians, and Human Salmonella Infection[3]. If you take the time to read through this article, it statistically proves that out of an average 1.4 million food related salmonella infections, and 600 associated deaths, only 6 percent were associated with reptiles, and less than 1% of human Salmonella infections are caused by the "reptile-associated" salmonella strain (reptile only specific salmonella strain). This leaves only one logical conclusion, the rest of the reptile associated infections that affected humans were caused by the reptiles getting infected by their food, the same food that many of their owners eat.

## EXOTIC ANIMALS IN CAPTIVITY ARE DANGEROUS?

The BC SPCA is opposed to the breeding and keeping of exotic animals as companion animals (Appendix A). The society has been actively working in this area for many years and has a number of staff well qualified in the keeping, rehabilitation and needs of both native and exotic wildlife. Exotic species are a significant concern for the countries to which they are imported as they risk ecological integrity if the animals are released into the wild. Exotic animals can carry transmittable diseases (i.e. Salmonella, monkey pox) and many pose a safety threat because they retain their defensive instincts and predatory nature. Also of great concern, is that many species are threatened in their country or origin by the trade, and countless animals suffer during import/export and while in captivity. While the BC SPCA staff have worked with a number of local governments to develop by-laws in this area, recent tragic incidents and exotic animal escapes in BC highlight the patchwork of legislation that governs exotic animals and the difficulties faced by the local municipalities, concerned members of the public, and animal welfare organizations.

OK, so the BC SPCA wants to end the private ownership of exotic animals. But where is their proof to justify what they want? Well lets have a look.

I am going to get straight to the facts here. Despite all the scare tactics that the BC SPCA, and media companys use, exotic animals statistically do NOT pose any “public safety threat”, and never have, both here in Canada and in the United States. Thus far, every single fatality involving a large exotic cat, happened during some type of interaction with the cat itself. No innocent member of the public has ever been killed by an escaped captive exotic cat (and this includes the accident near 100 mile house that the SPCA has been going on about, I will get to this later).

Here is a table from REXANO comparing the average lifetime odds in the US of being killed by several types of captive exotic animals (including large/exotic cats) compared to activities in everyday life that we all do[4]. The sources for their data are listed at the bottom of the cited PDF document.

**TOTAL NUMBERS AND ODDS OF AN ACCIDENTAL DEATH IN THE USA BY CAUSE OF INJURY in 2003 – comparing human fatalities caused by captive exotic and wild animals (average up to year 2006) to deaths caused in the course of a normal daily routine in every day life in 2003. REXANO only used fatalities numbers since all deaths are reported and there is only one degree of death. Injuries in all walks of life range from life threatening to simple Band-Aid fix and many go unreported. The average life expectancy of 77 years was used to calculate the lifetime odds.**

<b>Cause of death in 2003</b>	<b>Number of deaths per year</b>	<b>One-year odds</b>	<b>Lifetime odds</b>
Captive non-human primate	0*	0	0
Captive bear	0.125**	1 in 2,416,000,000	1 in 32,000,000
Captive elephant	0.81**	378,000,000	5,000,000
Captive big/exotic cat	1**	302,000,000	4,000,000
Captive reptile	1.5***	201,000,000	2,700,000
Fireworks discharge	11	26,440,910	340,733
Contact with hot tap-water	26	11,186,539	144,156
Flood	26	11,186,539	144,156
Bitten or struck by dog	32	9,089,063	117,127
Earthquake and other earth movements	32	9,089,063	117,127
Struck by or against another person	39	7,457,692	96,104
Lightning	47	6,188,298	79,746
Contact with hornets, wasps and bees	66	4,406,818	56,789
Cataclysmic storm (****)	75	3,878,000	49,974
Animal rider or occupant of animal-drawn vehicle	101	2,879,703	37,110
Alcohol	373	779,759	10,048
Fall on and from ladder or scaffolding	417	697,482	8,988
Drowning and submersion while in or falling into swimming pool	515	564,757	7,278
Firearms discharge	730	398,425	5,134
Air and space transport accidents	742	391,981	5,051
Occupant of all-terrain or other off-road motor vehicle	906	321,026	4,137
Drowning and submersion while in or falling into natural water	1225	237,429	3,060
Fall on and from stairs and steps	1,588	183,155	2,360
Exposure to smoke, fire and flames	3,369	86,331	1,113
Motorcycle riding	3,676	79,121	1,020
Assault by firearm	11,920	24,400	314
Motor vehicle accidents	44,757	6,498	84

Source: National Safety Council, National Center for Health Statistics, U.S. Census, animal attack news reports  
 \*In 1997 in Atlanta, Georgia, one Yerkes primate researcher supposedly died of herpes B after she was splashed in the eye with bodily fluids from a rhesus macaque; this can NOT be classified as animal 'attack', just like a nurse or doctor being accidentally infected with a blood from an AIDS patients can not be called a murder.  
 \*\* Based on 16 year average 1990-2006 numbers  
 \*\*\* Based on 11 year average 1995-2006 numbers  
 (\*\*\*\*)Includes hurricanes, tornadoes, blizzards, dust storms and other cataclysmic storms.  
 Note: Exotic animal yearly and lifetime odds numbers were rounded due to their extremely large size for the ease of use and quoting purposes in the media and legislative sessions.

In this chart, all the exotic animal related deaths (except for non human primates and reptiles) were based on a 16 year average. Captive reptile associated deaths were based on a 11 year average. This means that in all of the USA, with it's 300 million people, only 1 person per year on average dies as a result of interaction with a large captive exotic cat. This includes absolutely every form of captivity (zoos, sanctuaries, circuses, private owners, etc.). ***Every single one of these documented deaths involving a captive big exotic cat, all involved someone who made the choice to deliberately interact with the cat, and no innocent member of the public has ever been killed.*** This is no different than someone making the choice to risk skydiving out of an airplane, or someone wanting to drive their car down the freeway, or ride a motorcycle (which have statistically in the USA alone, killed far more people than captive exotic cats ever have in both Canada and the United States combined)[5][6]. Just take a good look at that chart and consider how many more deaths everyday activities on average cause than captive exotic animals. Do we see any calls to ban these activities?

Just as a side note though, the above chart is only based on exotic animal related deaths. The injuries are not included because they can vary from a simple scratch to life threatening, and therefore many will go unreported. The death statistics are accurate because they always make the news headlines. Even so, the amount of reported serious to life threatening injuries here in Canada and in the United States[5] involving exotic animals are still absolutely dominated by the number of annual human assaults, auto collisions, dog bites, falling down stairs, and the many other everyday activities we encounter in our daily lives.

**Simply put, captive exotic cats in the United states with 300 million people, statistically do not pose any public safety threat. All of the extremely rare deaths that did occur up to this date, involved people who choose to take the risk they wanted to take.**

WHAT ABOUT THE STATISTICS HERE IN BC OR CANADA, OR MAYBEE THAT “MAULING” THAT HAPPEND NEAR 100 MILE HOUSE??

By now you are probably asking yourself “well what about the statistics here in BC or at least in Canada?”. The answer is that there are simply not enough to justify ripping private owners of their rights to keep the animal of their choice. In Canada, sense 1990 to present (including the **accident** that happened near 100 mile house, BC) there appears to have been only 2 fatalities to Canadian citizens involving big exotic cats kept in captivity[5]. The first one one occurred on July 24, 1994 in Hanover, Ontario. It involved A 16 year-old boy who was bitten on his neck when he entered a cage with 2 tigers at a roadside zoo. This was 13 years ago, and strictly involved a risk that the minor chose to take, and was by no means a “public safety hazard”. The second documented “death” occurred at a private facility near 100 mile house, BC. Again, involving someone who choose to enter the property where the cats were kept and approach the enclosure. This was not an escape, by no means an “attack” (such as the media was making it out to be, I will prove this later) and therefore was not in any way a “public safety hazard”.

So here we have ruled out the following.

- There has not been any unintentional deaths from Exotic Cats to innocent members of the public, ever, in both Canada and the United States.
- All of the very statistically rare deaths that did occur, all involved a person(s) who personally made the choice to do what they did, weather it be trainers, handlers, zookeepers, private owners, sanctuaries, etc.

-Exotic animals in captivity contribute to an extremely small number of human deaths, both in Canada and the United States.

It should be therefore clear, that captive exotic animals in today's society pose an extremely small threat to human beings, and that even if there was ~30 times as many people per year being killed from captive exotic animals, they would still account for an incredibly small number of total human fatalities compared to the everyday activities that the average person faces in their lifetime.

Simply put, British Columbia does not need these proposed rules!

SO HOW WOULD THE RESPONSIBLE EXOTIC ANIMAL OWNERS FEEL OF THIS?

(as a side note, the list of species that are mentioned in the following quote from the BC SPCA submission package, are found in the submission package itself, and were just shown statistically the number of deaths they cause per year)

The Species listed should not be possessed, bred, and/or trafficked by private individuals in BC and they should only be kept under permits issued to an accredited education or breeding facility (i.e. Vancouver Aquarium, Mountain View Conservation and Breeding Center) that meets minimum animal care, welfare and management standards. The standards should reflect species-specific husbandry requirements based on the American-based Association of Zoos & aquariums (AZA) standards as modeled by the Government of Alberta Standards for Zoos in Alberta (Appendix D) and as later discussed in 2.3 WILDLIFE IN CAPTIVITY.

Current exotic animals on the list in private possession in BC should be grandfathered following an amendment to the definition of wildlife, however owners should be required to obtain a permit by 2010 to continue possessing the animal for the remainder of the animal's life. However, effective to the date of the new Act, any owner of a listed species should:

- Be prohibited to bred or traffick the animal(s) in their possession;
- Be prohibited from future acquisition of exotic animals;
- Be prohibited from having exotic animals on public display or in contact with any minors;
- Owners must have liability insurance for potential damage caused by the animals;
- The exotic animals must be microchipped and have vet checks;
- Owners should meet reasonable housing and care standards for the species as we recognize it will be difficult to relocate so many exotic species within the province or country and there are so few accredited facilities that can adequately house these animals.

The BC SPCA here has gone far beyond their original idea to simply “improve public safety” (which they clearly are not as I prove earlier), and are now just unfairly targeting all responsible exotic animal owners. First, their intention to prohibit the private user from transporting (they mentioned trafficking) their beloved exotic animal, is an unnecessarily cruel crime against the owner, and an extremely mean punishment for the animal, if made illegal. There are many situations that could arise that would raise the need for an owner to transport their exotic pet, such as a visit to an education facility, or the animal in need of specialty veterinary care that is far away, or the owner runs into a situation where they must move from where they are living. This would prohibit the owner from doing this, and ultimately (at least legally) having to part with their beloved animal all in the name of “animal rights” because of some simply unnecessary rules that were pushed through by the BC SPCA for no proper proven reason. As I mentioned, the human-animal bond between humans and exotic animals (especially the exotic cats) can be very deep. And there are many people today who feel they should be entitled to their right to do so. Denying private owners of this right I feel is a huge violation in of some of our basic rights as humans, and is a form of discrimination.

The benefits of this to humans who seek it out have long been researched and are well documented. Here are some very well thought out written articles that are worth checking out which explore this by various authors[7].

The reposed rule to “prohibit the future acquisition of exotic animals” is one of the BC SPCA's (and animal rights movement's in general) prime goal in this area, to ultimately abolish the private ownership of exotic animals. **They have no proven reason to do this. It will take away a right that British Columbians are currently entitled to, and should not disappear!**

The next prepared rule to end the use of exotic animals on public display is simply a violation of some of our basic rights of freedom. The BC SPCA again, has no proof to justify this. Captive exotic animals as I statistically showed you earlier, pose an extremely minimal threat to public safety, (and some species such as exotic cats statistically pose virtually none) and therefore, there is no reason to implement these rules and rip citizens of their right to legally have, privately run exotic animal related shows in our province.

One other problem with these proposed rules is the effect they would have on the movie industry here in BC, and the revenue it is going to cost the government. If there is a ban law that prohibits the importing of exotic animals and they cannot be legally transported to the appropriate filming location, this may simply lead to movie producers wanting to film any exotic animal related activities for their films somewhere else. Simply put, no movie producers who are looking for exotic animal related content, would have any interest in bringing their business here to BC if it really does become this heavily regulated. In other words, if these rules were enforced, it would create problems for, and take away revenue from any business in BC who deals with exotic animal related content for films.

Another point of significant concern is the long term effects these rules would have on the species themselves. The wild habitat for many wild animals (especially the exotic felines) is disappearing at an alarming rate, and captive breeding may be their only realistic hope for long term survival. Many of the tiger species today in the wild continue to be illegally poached for their fur and various parts, and their wild habitat continues to be destroyed. Even though efforts from governments around the world to try and eliminate this and extend conservation efforts are defiantly helping, this clearly is not enough to save these magnificent creatures from complete extinction[13]. Captive breeding is one very good

solution to this that can offer these wild animals realistic hope for long term survival, so they can survive in captivity. One problem with these proposed rules is that they would significantly interfere with almost every type of captive breeding effort that exists here in British Columbia, other than credited zoos and aquariums and a few breeding facilities (mentioned in page 6 from their submission package). These facilities have a limited amount of space, and there should not be any restrictions enforced that would completely eliminate the right for private breeders (or any breeders for that matter) to breed these animals for any legitimate purpose (providing it's done properly), weather it be for a responsible private owner, conservation facility, or zoo, etc. All forms of responsible ownership of wildlife in captivity (both commercial and private) will extend conservation efforts and this by no means should be regulated to a point where most of it would disappear. The BC SPCA obviously have not taken this into consideration, or do not seem to think this matters, and would rather see these conservation efforts disappear. The conclusion to this should therefore be clear. Taking away this right from these breeders would in no way “help” in conservation or “public safety”, it will only bring these animals closer to extinction.

The next rule, although may make logical sense at first, is simply not needed. Lets face it, insurance can be expensive, and the majority of exotic animal owners will want to have this remain as an *option* as to weather they feel they need it or not. This is an unfair and unnecessary burden on private owners and an attack on them, hoping they may run into financial trouble trying to keep up with the expensive payments, and maybe having to part with their animals as a result. If we are entitled to the right to be able to insure our houses from fire damage at our discretion, buy life insurance at our own discretion, then this should be too, given the extremely low, to almost non existent accidents that do happen.

The next rule is just highlighting the absolute sheer silliness of these proposed rules. There is no reason why a private owner should be required to have their exotic animal microchipped. This will accomplish almost nothing, especially in the event of an escape. Just ask yourself when there were 450 tigers loose in the streets of Vancouver, with animal control officers wondering whose is witch. Simply put, there is no reason for this rule!

The next proposed rule is absolutely meaningless in justifying why private owners should not be able to care for exotics. The majority of private owners, love their exotic animals to a point where they treat them as one of their family members. If the animals are properly and humanely being being cared for, weather in private or commercial facilities, (just as our domestic dogs and cats), government and the AR groups should keep their hands off of private owners animals, rights, and their property.

I am not denying in any way at all that there are some extremely rare case of “bad” exotic animal ownership. They undoubtfully do exist. But the occurrence of these incidents are so incredibly small, that it literally makes just as much sense to punish everyone because of them, as it would be to completely ban target practice with guns in the name of “banning human assault deaths from firearms”.

The truly “bad” private owners, will never be stopped, regardless of what the government does. They will ignore the rules regardless of what they imply and find ways to illegally breed and/or import exotic animals. **So This means that the proposed rules from the BC SPCA would only punish the responsible owners if pushed through and do nothing to stop the irresponsible owners.**

So whats next? Banning expensive sports cars from our roads because some few people choose to drive them irresponsibly?

There was a very well thought out article I came across that addresses the general issue of why people in today's society have developed this "fear factor" among several of the exotic pets that the BC SPCA wants to abolish from private hands, more specifically exotic cats. This is a very well thought out and well written article, that is worth checking out[8].

And last but not least from that paragraph, their final words, and they were fairly clear. Their ultimate goal with this is to see an eventual decline in the private ownership of exotics. And as I already mentioned, they statistically have no proof to properly justify this, and is just going to cause unnecessary emotional harm to private owners and their beloved animals.

As for the animals not being practical to adequately care for, this is simply not true. Most exotic animal owners are a small minority in today's society and deeply care for their animals as if they are family members. If you want proof of this, just go to [www.rexano.org](http://www.rexano.org) have read some of their stories, and check out their photo galleries, a large portion of these are written up by private owners who submit in their own essays. These people have a right to be able to bond with the companion animal of their choice, and should not be robbed of their ability to do so by some of the local AR groups that think they shouldn't be able to (without even having any proper facts to back it up and justify it). This to me, is a violation of some of our basic rights as humans.

There are some points I want to clarify here. The BC SPCA judging by what I see on their website and defiantly from what I see from their submission package, seem to be under the impression that they can guarantee "perfect" animal safety. This is not true, will logically never happen, and they shouldn't be in the business of doing so. It makes just as much sense to make that statement as to say you can guarantee perfect human related public safety. We as humans have some basic rights, and one of those rights is the need to connect to another living being, whether it be another human, or another animal(s) (domestic or exotic). Regardless of the fact that most humans would still prefer another human to relate to, the right for a human to privately care for and love+interact the animals of their choice, should be protected here in British Columbia (or anywhere for that matter). Simply put, the BC SPCA have no valid reason to take these rights away from the private owners in British Columbia!

These proposed rules would make this virtually impossible to "legally" happen, and this creates a bad and very emotionally stressful situation for both the owners and their animals. It creates dangers for the exotic animals themselves as they suddenly become viewed as a dangerous piece of "property" that must be ripped from its loving private owner if noticed. This forces the animals and owners into a situation where they either have to part with their exotic animals (which usually leads to them being destroyed, and in the best of cases, spending the rest of their life in a cage at some sanctuary, if they are lucky) or the owners turning to a black market as their last resort. **And all of this would be in the name of some unnecessary proposed rules from the BC SPCA, that they think would benefit British Columbia, which they will clearly not.**

Many animal rights groups such as PETA, HSUS, IFAW, API are well known for their unfair campaigns against, and targets towards private owners of exotics. For example, BigCatRescue down in the United States (which is known for its vicious campaigning against private owners) has been known for its owner, Carole Baskin, to try and carefully manipulate around statistics on their website to unfairly target private owners when in the end, it is absolutely nothing but lies[11]. Another classic example is the action that API (Animal Protection Institute) did towards a group of private owners, by

sending in undercover spies with hidden cameras, into several private facilities posing as private owners themselves. They took the video footage they collected and with careful editing, turned the completely normal footage they recorded into a virtually fake video that completely gave the wrong impression of what really happened[12]. All these acts were unfair targets towards private owners all in the name of “animal rights”.

Now there is one final point that I want to bring to everyone's attention who is reading this, and that is the **accident** that occurred near 100 mile house BC earlier in May. This was purely an accident, and by no means a “dangerous attack” or “mauling” as the local news stations lead Canada to believe. My proof of this is Google and the news stories, simply search for this accident on Google and you will see them using all these scare tactics, but there is one side to this story that most people missed. No news source anywhere actually directly stated/proved that there was an “attack” that occurred at all. This was an accident caused by bleeding from a tiger's claw, and the tiger in no way had any intentions of “viciously attacking”, and again, this involved making a personal choice, so the public was never in danger. Did we see any rules to prohibit the sale of angle grinders to the general public, after a BC worker bled to death from an exploding disc from an angle grinder he/she was using when it cut their artery[9]? This to me was a very unfair attack on the owner of the facility, and what the BC SPCA did following the accident I find absolutely disgusting. They immediately went straight into overdrive and unfairly targeted Kim Carlton for what happened, and actually had the nerve to use this **accident** in an attempt to start a public circulation of emails to call for a provincial ban of exotic animals by referring to this as a “mauling”[10].

Even though this comes right down to freedom of speech, I'm going to be realistic here based on what I have just proved. The BC SPCA had no business of doing this and should be ashamed of themselves for doing so.

There is nothing beneficial in any way at all regarding these rules that the BC SPCA is wanting to get pushed through. As I have shown, they would in no way improve “public safety”, would unfairly punish the responsible private caring owners, and would do nothing to stop the truly “bad” owners. So here are some recommendations that I am going to make.

- Please do not in any way, enforce any rules that would prohibit private owners from being able to *responsibly* care for and bond with the animal of their choice. This as I explained, should be protected.
- Both private and commercial breeders should not have these proposed rules enforced on them that would narrow their breeding efforts down to a few commercial facilities, providing that who they are breeding wild animals to, can responsibly care for them. Remember that the general excuse statement from the AR movement saying that 'all private owners can never properly care for these animals' is false. As I have already proven earlier, this is pure propaganda from the AR groups.
- Current, and future owners of exotic animals must be able to properly and humanely transport their exotic animals if the need arises. (Keeping in mind that transport by road is usually the only practical option here for larger species)

- The right for public displays to include exotic animals in their displays should not be prohibited if the animal(s) are being treated properly and humanely.
- Insurance for private owners should be left open as an option for them to use at their own discretion based on weather they think it is needed.
- Private owners should not be required in any way to have their exotic animal(s) microchipped, regardless of what type. Just as the insurance, this should solely remain as an option as to weather the owner wishes to have this done or not.
- Keep in mind that these rules are not meant to protect or help, they are meant to take away rights from British Columbians that they should be entitled to, and cause unnecessary emotional harm for private owners and their animals.

Sincerely,

'For the loving cats'

Walter Rabey  
8267, 114st. North Delta  
British Columbia  
Sept 21<sup>st</sup>, 2007

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