

# Ontario Zoo Review Series - #3

## Saunders Country Critters Zoo and Garden Centre



**August 2008**



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# ZOOCHECK CANADA INC.

Zoocheck Canada is a national animal protection charity (#13150 2072 RR 0001) established in 1984 to promote and protect the interests and wellbeing of wild animals.

## **Policy**

Zoocheck objects in principle to the keeping, confinement, use, exhibition and performance of wild animals in captivity as captivity is not in the best interests of those animals<sup>1</sup>. Nor does the exhibition of live wildlife provide a positive educational experience for the general public. Wild animals removed from their natural environment and ecological context bear little or no meaningful resemblance to their counterparts in the wild.

Nonetheless, animals are kept in zoos and similar captive situations at present and for these animals, improvements in the conditions to which they are subjected are urgently needed. Zoocheck believes the onus must be on the owners/operators of facilities who choose to keep these animals captive, to provide for them the best possible care in the circumstances.

## **The Investigation**

This report provides an overview of the Saunders Country Critters Zoo and Garden Centre in Oxford Station, Ontario on August 23, 2008. It is the third in a series of investigative reports aimed at providing a snapshot image of the current status of captive wild animals in Ontario.

## **Investigator Profile**

In 1978 Else Poulsen received her BSc. in Biology from Brock University and in 1995 her 4 year Diploma in Zookeeping from the City of Calgary Apprenticeship Programs. She has dealt with variety of animal species, in her work as a field biologist in Alberta's energy industry, as a zookeeper at the Calgary Zoo, and as a bear specialist in several other facilities.

She has provided expert assistance and advice about modernizing bear husbandry methods, environmental enrichment programming and enclosure design issues to zoos, sanctuaries and animal welfare groups around the world.

Poulsen has more than 40 papers and articles to her name in scientific research and technical journals, textbooks and other publications. She consults as an animal behavior and captive environment trouble-shooter. She has also lectured on modern bear care and animal welfare issues to audiences as diverse as university students studying population genetics to First Nations Band Council members in northern Canada.

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<sup>1</sup> In limited circumstances, exclusively for the purpose of benefiting the individual animal or species, Zoocheck Canada supports the keeping of wild animals in captivity as part of a legitimate rehabilitation and release program, or for non-releasable animals that have been retired or rescued, or that are part of a legitimate captive propagation initiative, provided the animal's physical, psychological and social needs are addressed as the primary concern.

# THE SITUATION IN ONTARIO

There are currently few rules governing the operation of zoos and other kinds of captive wildlife displays in Ontario. This lack of regulation has resulted in a proliferation of zoos and zoo-type exhibits in the province. Ontario has more of these facilities than any other province, including many of the worst in Canada

Unlike many other jurisdictions, in Ontario, non-indigenous exotic wildlife species are not regulated. Virtually anyone can acquire exotic wild animals, house them in conditions of their choosing and then open up for public viewing. There are no laws or regulations requiring the owners or operators of zoos to have expertise or experience in wild animal care, the financial resources to properly operate their facility or an ability to conduct their business in a humane and safe manner.

"Specially protected and game wildlife," defined as native wildlife listed in the *Fish and Wildlife Conservation Act*, can only be kept and displayed if a license to do so has been obtained from the Ontario Ministry of Natural Resources (MNR). Three general animal welfare conditions are attached to all licenses, but they are not specific and are open to interpretation, so enforcement is problematic.

Ontario's lack of zoo licensing and comprehensive wildlife in captivity standards has resulted in a large number of zoos and wildlife menageries operating at a standard of their own choosing. There is nothing in place that specifically addresses the many issues associated with the capture, breeding, keeping and display of wild animals in zoos and zoo-type exhibits.

The unfettered proliferation of wild animal displays in Ontario has been recognized as a problem for approximately 30 years. Numerous measures to deal with this issue have been initiated, but none have been fully supported by government, so the captive wildlife industry remains essentially unmonitored and uncontrolled to this day.

The Government of Ontario has the ability to create a regulatory regime for all wildlife in captivity that is consistent with other jurisdictions, comprehensive, fair to license holders and respectful of the many individual animals whose lives are directly affected by it. In addition to numerous workable and adaptable models being available in other jurisdictions, in 2001, the MNR published its own set of standards for zoos.

## **Comprehensive Licensing and Regulation is Required**

The Ontario government should implement and administer a comprehensive zoo and wildlife in captivity regulatory program that requires anyone holding native and/or exotic wild animals in captivity to obtain a license and to satisfy a series of conditions as to their knowledge, experience, financial abilities, wild animal housing and management practices, safety procedures and other relevant issues. Licenses should be issued annually and only after an inspection of the premises to be licensed is conducted. The regulatory program should include the ability to conduct special inspections, penalties for non-compliance and provisions for license revocation.

## ***Bill 50, An Act to amend the Ontario Society for the Prevention of Cruelty to Animals Act***

In 2008, the Ontario government introduced *Bill 50, An Act to amend the Ontario Society for the Prevention of Cruelty to Animals Act*. During the buildup to the introduction of the Act, government officials and elected representatives said the Act would deal with a variety of animal welfare issues, including roadside zoos.

Bill 50 would:

- Make it a provincial offence to abuse any animal. Ontario is the only province where it is not an offence to abuse most animals. It is only an offence to abuse cats and dogs in commercial breeding operations.
- Establish penalties including a lifetime ban on owning animals.

- Allow the Ontario SPCA to inspect roadside zoos and other facilities that keep animals. Currently, anyone can refuse to show the Ontario SPCA their animals.
- Establish animal care standards and make failing to comply with these an offence.

While Bill 50 contains a number of very positive features and will significantly improve the existing Ontario SPCA Act, it will not address most of the problems that have been identified in zoos and zoo-type exhibits across the province.

Even though the Ontario government has repeatedly indicated its intent to deal with wildlife in captivity issues through Bill 50, there are currently no standards or regulations being proposed at this time. If standards of some kind are developed in future, they will not contain up front licensing of zoos and zoo-type exhibits that screen persons wanting to own wild animals or open public displays. Standards promulgated under Bill 50 will be enforced retroactively after animals have been acquired or a zoo or wildlife display opened.

If, as the Government of Ontario has stated, Ontario is to move from "worst to first" in animal protection, then Bill 50 must include comprehensive regulations for zoos. With the weakest zoo regulations in the country, Ontario is the only province that does not require zoos and zoo-type facilities to meet specific public safety requirements and does not require residents to obtain a license to keep exotic wild animals.

The lack of appropriate laws and regulations, and the difficulties inherent in enforcing the existing relatively minor welfare provisions attached to licenses issued under the *Fish and Wildlife Conservation Act*, mean that Ontario's zoos and wildlife exhibits go more or less unchecked. This has left a need for independent animal welfare agencies, such as Zoocheck Canada and the World Society for the Protection of Animals (WSPA), to proactively and comprehensively monitor and evaluate these facilities for concerns of human health and safety and animal welfare.

# **COMMENTARY – Saunders Country Critters Zoo and Garden Center**

## **General**

This is the first year that Saunders Country Critters Zoo and Garden Centre is open to the public. However, they have been in the business of breeding, trading and selling animals since 1992, when they began with several llamas. This is my first inspection of this facility.

This facility is a typical, roadside animal menagerie with approximately 35 species housed, primarily in breeding pairs or small groups, in simple “homemade” cages and enclosures that are too small for the animals to express a full range of natural behaviours.

The owner provides tours at 11 am and 2 pm. When asked she commented that she and her husband are farmers first and the garden center and the menagerie are their hobbies.

I have little doubt that the owner is “attached” to her animals and that she believes she is doing everything possible to maintain their welfare. She told me she is not a “good breeder,” because she becomes attached to her animals, so she keeps an original breeding pair and sells or trades their offspring to other facilities. In her talk, she mentioned several larger accredited zoos as her partners whom she supplies and vice versa.

I was unable to determine the veracity of her statements. Some of her animal commentary is factually accurate, some of it is not. For example, in her explanation about how the facility started she indicated that it was “licensed by the provincial and federal governments and by CAZA” (Canadian Association of Zoological Parks and Aquariums). I was unable to determine whether Saunders Country Critters holds a valid license from the Ministry of Natural Resources for the keeping of native wildlife in captivity. They do not have a federal license because there is no federal licensing of zoos and the facility is not an accredited member of CAZA.

The menagerie is only open Friday to Sunday (10 am to 4 pm) and, according to the owner, they have two high school students who volunteer for ticket taking, gift shop sales and light animal maintenance. These young people apparently enter at least some of the animal cages during cleaning.

There is one full time staff person who works both the farm, garden center and, on occasion, with the animals. I spoke to this staff person who erroneously explained to me that the kinkajou (also called a “honey bear” due to their propensity for sugars) is related to bears.

## **Husbandry and Animal Welfare**

The animals at this facility are treated more like pets than wild animals. Some of them appear to be “bonded” to the owner. Apparently, newly bred young are routinely pulled from their mothers to be bottle raised. This makes them easier to train for “shows” at the other facilities they are sold to.

The owners claims that hand-feeding actually “improves their quality of life in the captive environment and, in some cases, such as the macropods animals live up to three times longer when human raised than when mother raised.” However, she did tell us earlier in the tour that the female Ring-tailed lemur was very dangerous because she had been imprinted on humans and now is in competition with the owner for status, thus the lemur “would kill her in an instant if she could.” Unfortunately, she didn’t mention the possibility that animals may be socially damaged by not having proper social contact with their parent(s) and that the parents themselves may be stressed and suffer when their young are taken away.

The cages are “homemade” and many of them include double door entry gates. Most also have a feeding station/room separated from the rest of the exhibit, where food dishes are positioned in wooden receivers. The owner explained that this was so she could feed the animals without entering the cages, yet she went in with the

majority of the animals during the tour.

Most of the cages were reasonably well equipped with species-appropriate furnishings that usually exploited the available vertical space. However, while this aspect of the housing was positive, it was offset by the fact that the cages were often far too small for their occupants.

The animals are fed twice a day in “single-piled” feedings. Fruits and vegetables are fresh and small dishes of water and “pet flask” waterers appear clean. They seem to have a problem keeping the larger black buckets clean and algae free, so I assume these are not part of the daily cleaning routine. At the armadillo cage the owner explained that the green algae ridden, dirty water in the black tub was there because armadillos insist on drinking dirty water. She claimed, “they won’t go near clean water.” In actual fact, wild armadillos will drink from small streams and water holes in the sandy soil. They tend to stay away from marshy areas. Since they have a heavy carapace they will inflate their stomachs with air in order to stay afloat to cross water bodies. All indications are that they drink clean water in the wild. Armadillos do however like to wallow in mud to clean their carapace. It is possible that this somehow has been misunderstood.

While there are furnishings in some of the enclosures, enrichment throughout the entire facility is underdeveloped, so the animals, especially those who are not in appropriate social groupings, sit, lie or sleep because there is little for them to do. I observed the fennec fox engaged in what appeared to be a stereotypic pacing pattern.

Patrons are encouraged to purchase sugar cones full of pellets to feed the animals. This is a poor feeding practice as there are no controls, so more aggressive animals may receive too much, while less aggressive or younger animals receive little.

A single sloth is housed in a tiny cage inside the greenhouse. This animal was lying on a shelf in its enclosure and was unable to properly hang from more than one perch.

### **Public Safety**

The owner’s habit of going in with the animals to feed them is a potential safety hazard. While giving the feeding tour she was scratched by the coatimundis and needed two bandages because she was bleeding.

While most of the cages and enclosures are sufficiently secured, there are a couple of locking “mechanisms” that need to be replaced with real locks.

The fencing around the domesticated goat enclosures is damaged and may be a potential safety hazard to the animals.

### **Public Education**

There are many “homemade” signs throughout the facility, some containing questionable information. For example, the genet sign states, “The male will urinate in the drinking water after he and his mate have drank to prevent any others from having access to fresh water.”

The genet sign also says, “If hand reared from a young age they can easily and very happily be kept as house pets.” While biological information is provided on some of the signs, there is little about the conservation status of the animals.

It appears as though school groups and other children’s groups attend the facility. An area of picnic tables and a sandbox full of children’s toys was observed.

## Summary

My impression is that this facility treats animals from a predominantly anthropocentric perspective. They do not seem to be treated as wild animals that need to act according to their natural lifestyles and genetic make-up, but more as vehicles for human amusement and pleasure.

The owner of this facility does not hide the fact that she has bred and sold animals for the exotic pet trade for years. She maintains extremely close contact with individual animals, presumably to facilitate her taking their young to be hand-raised, so they can be sold or traded.

The enclosures are small and should be expanded to accommodate the spatial needs of each animal species. However, in the interim, the introduction of a facility-wide enrichment program, achievable at low cost, would enhance animal welfare almost immediately.

There does not seem to be any kind of substantive conservation education program at Saunders Country Critters Zoo and Garden Center, so its contribution in this regard is negligible, if it exists at all.

Saunders Country Critters Zoo and Garden Center seems to be an extension of the owner's exotic pet breeding initiative. It requires considerable upgrading and a change in philosophy in order to fill a productive purpose that benefits animals. That will be difficult to achieve.

## Live Collection List (in order of appearance on tour)

Domesticated goat	Sulcata tortoise
Coatimundi	Various small bird species
Ring-tailed lemur	Yak
Dove and pheasant (various species)	Domesticated ungulates (horse/pony/donkey)
Patagonian cavy	Agouti
Genet	Kinkajou
Red-necked wallaby	Fennec fox
Angora goat	Llama
Reeves muntjac	Siberian lynx
Eurasian lynx	Caracal
Armadillo	Squirrel monkey
Ruffed lemur	Sloth
Vietnamese pot-bellied pig	



The cages and enclosures are constructed primarily of wooden frames with wire fencing and of very simple design.



Cage furnishings that help keep the animals occupied are basic and could be improved.



Small spaces and flat substrates can be boring for animals.



All cages and enclosures should be equipped with public stand-off barriers that protect both human visitors and animals.



Bare floors and sparsely equipped interiors leave many animals with little to do.



Cage doors and gates to animal service areas should always be locked and secured.

## CONCLUSIONS & RECOMMENDATIONS

This series of investigative reports highlight animal welfare and human safety concerns in zoos and wildlife displays across the province.

Key problems identified in Ontario zoos in 2008 include:

1. Poor animal health and welfare;
2. Undersized, badly constructed, poorly designed cages and enclosures;
3. Inappropriate substrates (floor surfaces);
4. Lack of adequate shelter and privacy;
5. Lack of stimulation (e.g., furniture, objects, other enrichment);
6. Lack of nutritive food and potable water;
7. Inadequate safety and security measures.

Many of these problems have been identified in previous reports by various parties in past years.

### **Recommendation**

*Bill 50, An Act to amend the Ontario Society for the Prevention of Cruelty to Animals Act* is currently being considered by the Government of Ontario. It contains a number of very positive features and will significantly improve the existing Ontario SPCA Act. However, there are currently no standards or regulations being proposed at this time within Bill 50 or in any other provincial legislation that will properly address issues associated with the keeping of wildlife in captivity. Ontario has the ability to create a regulatory regime within Bill 50 and in other legislation that is both comprehensive and workable but, so far, has chosen not to do so.

In order to properly handle the various animal welfare and human safety concerns inherent in the operation of zoos and wildlife displays, a comprehensive regulatory regime is required. Regulations must require anyone holding native and/or exotic wild animals in captivity to obtain a license and to satisfy a series of conditions as to their knowledge, experience, financial abilities, wild animal housing and management practices, safety procedures and other relevant issues. Annual licenses should only be issued after an inspection of the premises that is to be licensed is conducted. The regulatory program should include the ability to conduct special inspections, penalties for non-compliance and provisions for license revocation.

If, as the Government of Ontario has stated, Ontario's animal protection laws are to be brought from "worst to first," then *Bill 50, An Act to amend the Ontario Society for the Prevention of Cruelty to Animals Act* must include comprehensive zoo regulations that adequately and proactively address animal welfare and human safety concerns in Ontario zoos and wildlife displays.