



Nuisance Wildlife Control Inc.

P.O. Box 40, Spencerville, Ontario K0E 1X0
(P) 613-658-2223 (F) 613- 658-2224 Email: info@nwcinc.ca

**Communication : C 2
CW (2)
April 16, 2024
Item No. 11**

April 14, 2024.

City Of Vaughn
Office of the City Clerk
2141 Major Mackenzie Drive
Vaughan, ON
L6A 1T1

RE: Comments in regards to the following - NOTICE LICENSING OF WILDLIFE REMOVAL COMPANIES OPERATING IN THE CITY OF VAUGHAN COMMITTEE OF THE WHOLE – TUESDAY APRIL 16, 2024

Please see below our comments in relation to the above noted notice for the intent to change the City's Business Licensing By-Law regarding wildlife control.

1. Requiring all wildlife removal companies operating in Vaughn to be licensed.

We are not against the licensing of a business to operate a wildlife control operation within a jurisdiction. However, it should be a province wide licensing system and not governed by each municipality. Also, individual employees within the business should not need to obtain a license to operate as an employee of a business within the province. One license should cover all employees operating within the business entity. If separate employees are all required to obtain an operating license, operating as a wildlife control business would become cost prohibited. This has been considered in the past with other municipalities and would severally hamper any potential business when hiring employees and expanding their business. For instance, some small businesses have upwards of 10-20 employees that work across the Greater Toronto Hamilton Area. If every municipality were to follow your lead and require business and/or employee licensing the cost would be severe. In addition, if the business was to pass the cost to the employee as part of working for them, the potential workforce pool to draw from would be severely impacted especially in the labor shortage times of today.

Wildlife control comprises more than dealing with live animals. Most wildlife control operators will also provide services that can protect your home, business or other related structure from other future wildlife issues leading to a more humane result for animal populations in the area. Many of these services would fall into construction or repair. This would add to an expense if additional business licenses were needed.



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If licensing is required, there is the assumption that some sort of training would also be required to obtain a license. We do not have reservations against the requirement for training however the training should be a province wide standard or nation-wide standard. It should not be separate training developed by each municipality. Currently there are many programs available that could be tailored for wildlife control in Canada. Organizations such as the National Wildlife Control Operators Association, the National Wildlife Control Training Program, and various other small training organizations such as Wildlife Control Technologies having training available. These organizations have training programs in place that could easily be tailored for Canada.

In addition, Fleming College has taken steps to develop a wildlife control / pest management diploma/certificate program. They have applied for accreditation certification and funding from the Ministry of Education from our understanding to develop a program. It should be noted that the Fish and Wildlife Conservation Act already outlines who is an approved agent to deal with wildlife conflicts.

The companies that do secure a license should not be made public. The reasoning for this is often extreme animal rights groups will often target individuals and companies with death threats and equipment vandalism.

2. Requiring all wildlife removal companies to develop and maintain policies and records related to their activities.

Many companies already keep records of animals they removed or relocated as it is. Many organizations require this information for clients. For instance, the Canadian Wildlife Service requires documentation about how many nests are destroyed, what measures have been taken to prevent or deter bird issues, ect. They often will not give a permit to landowners without showing what measures have been taken to reduce the problem.

3. Requiring all wildlife removal companies to use humane trapping and release practices.

Our belief is that companies should be using humane trapping/handling practices but should not be forced to use release practices. Currently, here in Ontario and across Canada there is already a set standard in place for testing trapping methods through the Fur Institute of Canada. Wildlife controllers are mandated to use these traps by provincial governments while trapping animals. These standards cover many of the animals involved in human / wildlife conflicts.



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Animal release practices should not be forced in any way due to the potential issues it can cause regarding liability issues, disease transfer and humane treatment of the animal in question and the surrounding wildlife.

From a liability view, who is responsible for the consequences of the animal actions after release. An example would be if a squirrel who is released proceeds to enter a residents attic space and chews on electrical wiring causing a fire. Is the person who released the animal responsible for the cause of that fire? Is the municipality responsible due to its policy forcing the animal controller to release?

Also, if relocation is forced to occur rather than other humane methods, animals should be ear tagged with an identification tag that can be traced back to the relocater. Many animals develop habits and methods of survival that can severally damage homes. An example would be a raccoon that has learned how to enter attic spaces through roof vents. Many times these raccoons will completely destroy a roof vent to enter an attic. If relocated that raccoon would likely repeat the actions to enter another attic space as that is how it knows to survive.

Disease transferer is another issue. Currently, in the Hamilton area there is a rabies outbreak that started in 2015 from what was believed to be a raccoon that was brought from the US, most likely in a tractor trailer. Ontario was declared free from Raccoon rabies for several years prior in 2008 (Ontario Government, 2024). Now the government has started a TVR (Trap-vaccinate-release program) and ariel and ground baiting programs to help control the spread of raccoon rabies from entering the Greater Toronto Area from the Hamilton Area. According to the Ontario Government (2024) there has now been the following number of raccoon rabies strain cases per year: 2015 (10 cases), 2016 (256 cases), 2017 (119 cases), 2018 (119 Cases), 2019 (22 cases), 2020 (9 cases), 2021 (14 Cases), 2022 (23 Cases), and 2023 (6 cases).

Similar occurrence has happened in other locations as noted in a study by Fevre et al (2006). In their paper they examine a case study in relation to rabies. Three dogs were imported into Flores Island in Indonesia which led to the culling of almost 50% of the dog population and tragically 113 human deaths (mainly children).

Rabies is just one disease that can have severe impacts on human health. Others include raccoon round worm (*Baylisascaris procyonis*), *canine distemper*, *parovirus*, and *leptospirosis* are common diseases associated with raccoons (Hirsch et al, 2013). According to Kazacos (2001) raccoon round worm has been found in up to 82% of raccoons. This parasite in humans can cause permanent vision loss to death.



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Within the Fish and Wildlife Conservation act, when wildlife is relocated it must be in close proximity. Ministry of Natural Resources policy is 1km from capture. You can view the policy here: <https://www.ontario.ca/page/harass-capture-or-kill-wild-animal-damaging-private-property> . In their policy, it also states, you can only release on private property with permission. Most scenarios in which you are trapping wildlife, this is impossible. It often leads to people releasing wildlife on land which they believe is greenspace but is not. Many of the “green spaces” end up being utility corridors. An example would be an electrical facility where animals can cause power interruptions and cause not just thousands of dollars but millions of dollars of damage or interruptions (power outage at a manufacturing plant).

Relocating animals can cause undue stress on the animal and is not necessarily humane either. Many animals are territorial and will fight with other wildlife who have moved into their territory. These fights are often to the death. Other animals often migrate a long distance resulting in death from car accidents on roadways. Many animals store food or learn their home territory in terms of food sources. These animals often perish due to exposure. There was study presentation in 2021 with The Wildlife Society which discussed coyotes which were radio collared and translocated away from their original home range to see the effects of translocation. The effects were worse than the researchers originally believed. Thirteen coyotes were radio collared, 13 were confirmed non trackable within 14 weeks, 12 died and the last radio collar failed. A brief synopsis of the presentation is available at the following website: <https://wildlife.org/tws2021-translocated-nuisance-coyotes-have-low-survival/>.

Lastly, relocating problems species is often inhumane to the animal. For raccoons, ranges tend to increase in size and raccoons tend to be more active until ~36 days after being relocated to when activity level goes back to average pre relocation (Hill et al, 2023). During this active stage many raccoons die for several reasons including car accidents, shooting, poison or other animals. One study from Rosatte and MacInnes (1989) had 50% of the raccoons relocated die within 3 months. Many of the raccoons in their study were caught in the fall with poor body condition.

4. Requiring all wildlife removal companies to maintain certain standards for vehicles used to transport wildlife.

Maintaining certain standards for vehicles is a given responsibility for a legally operating wildlife control company. If the design of a vehicle causes undue stress to an animal there are already laws in place which would lead to a fine for cruelty / unethical treatment of animals through the Fish and Wildlife Act of Ontario. One reservation we have is the marking of vehicles. This is due to safety concerns regarding animal rights groups.



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Thank you for your time in reading our response. If further information is required, we would gladly answer question related to operating a wildlife control business. You may contact us at 613-658-2223 or info@nwcinc.ca.

Thank you,

Darcy Alkerton,
Owner/President,
Nuisance Wildlife Control Inc



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References

Fevre E., Bronsvoot B., Hamilton K, and Cleaveland S. 2006. *Animal movements and the spread of infectious diseases*. Trends Microbiol 14 (3): 125-131.

Hill J., Helton R., Chipman R., Gilbert A., Beasley J, Dharmarajan G., and Rhodes O. 2023. Spatial ecology of translocated raccoons. Sci Rep. 13: 10447.

Hirsch B, Prange S, Hauver S, and Gehrt S. 2013. Raccoon Social Networks and Potential for Disease Transmissions. PLoS One 8 (10).

Kazacos K. 2001. Parasitic Diseases of Wild Animals. Iowa State University Press 2001. Pgs 301-41.

Ontario Government. 2024. *Rabies Cases*. Website: <<https://www.ontario.ca/page/rabies-cases#section-9>> Accessed April 5, 2024.

Rosatte R, and MacInnes D. 1989. "Relocation of City Raccoons" (1989). Great Plains Wildlife Damage Control Workshop Proceedings. 460.