

Richmond Animal Protection Society

November 24, 2009

Richmond City Council
6911 No. 3 Road
Richmond, BC V7C 5B2

Re: Prohibition on the sale of unsterilized rabbits in pet stores.

Dear Honorable Mayor and Councilors of the City of Richmond, BC:

On behalf of the Richmond Animal Protection Society, we are delighted that the City of Richmond is considering steps to address the rabbit overpopulation problem in Richmond. RAPS supports the proposed bylaw changes to require that all rabbits sold in pet stores in Richmond be spayed or neutered. In addition, RAPS supports the decision to enforce this bylaw through ticketing and fines.

The options presented in the staff report are: 1) to maintain the status quo and allow rabbits to continually be sold in Richmond 2) to place a ban on the sale of rabbits in pet stores overall or 3) to require that rabbits be spayed/neutered prior to sale. As you know, the third option has been recommended by city staff. RAPS would like to include the following points for the record on this matter.

Although requiring rabbits to be fixed prior to being offered for sale is a good idea, it is unlikely that that pet stores will sell spay/neutered rabbits. Most, if not all, of the rabbits sold in Richmond pet stores are between two and three months old. Most rabbits are not old enough to be fixed until they are 4-6 months old or later. Pet stores will be faced with waiting until the rabbits are old enough and then sterilizing them at a cost of \$200 per rabbit. Alternatively, the bylaw may not be adhered to by pet store operators. In either case, if an amended bylaw goes into force, it may effectively be played out as options 1) or 2) instead of option 3).

It should also be noted that requiring retail rabbits to be fixed does not address the issue of rabbit abandonment, which results from a lack of pet owner screening of the type typically performed by animal welfare or rescue organizations. If this bylaw amendment is meant to address the overpopulation problem caused by abandoned domestic rabbits in Richmond's parks and open spaces, then we should be clear that a fixed abandoned rabbit eats just as many flowers as does as a fertile abandoned one. Nonetheless, this amendment would have some effect on the loose rabbit population even if the sterile rabbits are abandoned in parks. This abandoned *sterile* rabbit population would simply grow linearly with time (as more rabbits are sold from pet stores each week) instead of growing exponentially as is typical for unfixed rabbit populations.

To truly influence the loose domestic rabbit population in Richmond, we must stop the source of these rabbits altogether. Since adopters of rabbits from rescue groups are screened, it is less likely those rabbits are being abandoned, and it is logical to conclude that abandoned rabbits are coming from irresponsible owners who obtained their pet from a source that does not screen for responsible ownership behavior, such as a pet store. RAPS knows that many rabbits in Richmond parks are either abandoned rabbits or are born to abandoned domestic rabbits from pet stores because people have actually reported having done this. When anyone comes to adopt an animal at RAPS, we inquire about their previous history as a pet owner. We have had many people tell us that they once got a rabbit from the pet store, but they released it to Minoru Park. In contrast, rescue groups who screen their applicants will require the new pet owner to return the animal to the rescue organization in the event that the pet owner cannot keep the rabbit. When this condition is placed on pet owners, there is no need for pet owners to abandon animals in the park.

Finally, the staff report does not recommend option (2) (to ban the sale of all rabbits) based on the logic that a ban would prevent people from purchasing rabbits. However, there are many reputable breeders selling rabbits and plenty of rabbits for adoption. The option to ban the sale of rabbits in retail outlets is simply meant to prevent the impulse buying of baby rabbits at their cute, cuddly, adorable stage.

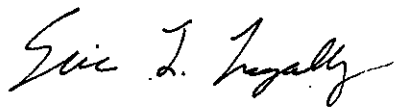
As a result, RAPS would like to recommended the following course of action:

- 1) that Business Bylaw regulation 7438, Amendment Bylaw 8524 be accepted by full council with one minor change: All rabbits that are spayed and neutered must be tattooed in the ear at the time of the surgery to indicate that the animal has been sterilized, so that abandoned rabbits can be identified as having been spayed or neutered. This ensures that rabbits that are separated from their paperwork as having been fixed not be subject to the surgery again.
- 2) that staff be directed to consider a complete ban on the sale of rabbits (and other animals) in pet stores
- 3) that Municipal Ticket Information Bylaw 7321, Amendment Bylaw 8556 be amended to increase the infraction fee to \$200.00 per infraction.

Sincerely,



Christie Lagally
RAPS Volunteer



Eric Lagally
RAPS Board Member and Treasurer

cc: Richmond Parks, Recreation and Cultural Services Committee members