



City of Richmond

Report to Committee

To: Parks, Recreation and Cultural Services
Committee

Date: February 2, 2022

From: Todd Gross
Director, Parks Services

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Re: 2022 Feral Rabbit Update

Staff Recommendation

That the proposed feral rabbit management strategy for 2022 as described in the staff report, "2022 Feral Rabbit Update," dated February 2, 2022 from the Director, Parks Services be approved.

Todd Gross
Director, Parks Services
(604-247-4942)

REPORT CONCURRENCE		
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER
Sustainability & District Energy Community Bylaws	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
SENIOR STAFF REPORT REVIEW	INITIALS: 	APPROVED BY CAO

Staff Report

Origin

The purpose of this report is to provide an update to Council on the present status of feral rabbits in Richmond and to seek approval for a proposed 2022 approach to management of these rabbits.

This report supports Council's Strategic Plan 2018-2022 Strategy #2 A Sustainable and Environmentally Conscious City:

Environmentally conscious decision-making that demonstrates leadership in implementing innovative, sustainable practices and supports the City's unique biodiversity and island ecology.

This report supports Council's Strategic Plan 2018-2022 Strategy #8 An Engaged and Informed Community:

Ensure that the citizenry of Richmond is well-informed and engaged about City business and decision-making.

Analysis

Background

Feral rabbits are domesticated animals that have been abandoned or escaped outdoors (or are the offspring of such animals). The rabbits commonly found in Richmond are European rabbits (*Oryctolagus cuniculus*) and have been classified by the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRO-RD) as an invasive species. This problem is not unique to Richmond; feral rabbits are widespread throughout Metro Vancouver's member municipalities.

Rabbits continue to impact the community on both public and private landscapes, in a number of ways:

- **Damage to Infrastructure.** On both public and private property, rabbits cause damage to plants, turf grass, trees, and soil by burrowing, eating, and defecating in gardens and parks. Burrowing also undermines pathways, sloped areas and impact areas around structures (foundations).
- **Ecological Impact.** The adaptability, lack of natural predators and prolific breeding enable domestic feral rabbits to rapidly outcompete native species. Rabbits feed on a number of native plants and shrubs across Richmond which result in the damage and loss of natural habitat. Furthermore, domestic feral rabbits have been reported in and around agricultural land. This migration could have a major impact on Richmond agricultural communities.
- **Health and Safety.** Considering their prolific nature, feral rabbits pose a health and safety risk to other wildlife, as well as Richmond residents. Rabbits in Richmond have been found to carry the Rabbit Hemorrhagic Disease (RHD), which poses a potential

threat to native rabbit species if the issue is left unchecked. Furthermore, because feral rabbits are transient and often seek out new habitable space, they often invade roadways and can pose a risk to motorists' safety.

- **Increased Rodent Activity.** Some well-meaning visitors to Richmond parks, particularly Minoru Park and Dover Park, are bringing food for the rabbits. This is not dissimilar to residents who feed birds in public areas. The food is not always eaten immediately by the rabbits and the leftovers are often a food source for rodents. This in turn increases the potential for predation by other animals, including coyotes.

Legislative Framework

In British Columbia, all species of the family *Leporidae* (hares and rabbits) are considered "wildlife" under Schedule A of the *Wildlife Act (the Act)*. Furthermore, the European rabbit is classified under *the Act* as a Schedule C animal which can be captured or killed anytime in British Columbia without a license or permit as they are deemed an invasive species.

Under this regulation, a captured feral European rabbit cannot be transferred to another party (e.g., via adoption or sanctuary placement) without a permit. That permit is required for the person receiving or engaging in the adoption of the animal. This creates a challenge for municipalities to effectively manage feral rabbits. *The Act* provides certain exemptions that allow a person to trap, transport, and possess feral European rabbits without the need for a permit, including private homeowners.

In addition to the above management parameters, the following also apply:

1. Contractors and/or non-profit groups can trap and retain rabbits indefinitely without a permit. This option is only allowed if the contractor or non-profit group understand what is needed to ensure the health and safety of the captured rabbits, and also has capacity to shelter the rabbits as defined by the *Animal Health Act*. Further clarification is required to better understand the health and safety requirements.
2. Contractors and/or non-profit groups currently can not spay or neuter captured rabbits and then offer them for adoption or re-release into the environment.

Staff have spoken with FLNRO-RD staff and they have indicated that changes to regulations are pending as they pertain to the capture, housing and adoption of feral rabbits which will provide municipalities an avenue for more effective management of this invasive species. Staff will continue to monitor the situation. Should the proposed changes proceed, staff will incorporate them into the City's management of feral rabbits.

Current City Management Practices

The City's current management practices include the following:

- **Bylaws.** City bylaws have been implemented including banning the sale of rabbits in pet stores in 2010. Through the Public Parks and School Grounds Regulation (Bylaw No. 8771), feeding of animals (including rabbits) in any public park or school ground, and the depositing or release of animals (including rabbits) in any public park or school ground is

prohibited. As per the Animal Control Bylaw (Bylaw No. 7932) homeowners are permitted to keep up to two (2) domestic rabbits per household. Staff are not currently contemplating additional bylaw changes for the management of domestic or feral rabbits.

- **Public Awareness.** This tactic involves educating community members about the bylaws in place to not exacerbate the problem through feeding rabbits or abandoning them in public parks.
- **Trap and relocate to a sanctuary.** The City has worked with Rabbitats to trap and relocate feral rabbits to the Rabbitats rabbit sanctuary.

While culling is an option permitted in the Provinces *Wildlife Act*, the City of Richmond does not manage feral rabbits in this manner. In order for this measure to be fully effective, a sustained and integrated approach is required to ensure that the problem is effectively managed for the long term. There are societal sensitivities to implementing a cull program.

The BC SPCA which operates the City's animal shelter does not accept rabbits, domestic or feral animals. The BC SPCA has posted the following statement on the topic of feral rabbit management:

"The BC SPCA is opposed to the abandonment of domestic rabbits into the wild, which is a criminal act under the *Criminal Code of Canada* and an offence under the *Prevention of Cruelty to Animals Act*. The BC SPCA strongly encourages municipalities to enact bylaws that prevent the sale or adoption of unsterilized rabbits and manage free-living domestic ("feral") rabbits.

The BC SPCA does not support the lethal control of free-living domestic ("feral") rabbits for nuisance reasons (including culls). When control is needed, the BC SPCA strongly encourages the use of non-lethal, non-contact, prevention and exclusion techniques. In addition, the BC SPCA supports activities that aim to humanely trap, sterilize, and re-home adoptable rabbits in approved homes or sanctuaries that can provide for their needs for the remainder of their lives." (Source: <https://spca.bc.ca/programs-services/leaders-in-our-field/position-statements/position-statement-on-feral-rabbits/>)

Rabbitats Rescue Society

2020 Program

In December 2019, the City entered into an agreement with Rabbitats Rescue Society (Rabbitats), a local not-for-profit society, to develop a rabbit removal pilot project in the Dover Neighbourhood Area. This pilot project contracted Rabbitats to:

- Safely and humanely trap the rabbits from Dover Neighborhood area;
- Spay/neuter and vaccinate the rabbits against RHD; and
- Permanently house the rabbits at one of their Rabbitats sanctuaries.

As part of the agreement, Rabbitats utilized its network of trained volunteers to trap, transport, and house rabbits that were successfully captured. In working with City staff it became clear that

it would be necessary to vaccinate, and spay or neuter any captured rabbits, to not only ensure the wellbeing of the animals, but to also certify their responsible, indefinite care. To this end, Rabbitats employed the services of a veterinarian to perform the vaccination and spaying or neutering of the animals at a cost of \$200 per rabbit.

This pilot project resulted in the capture and housing of 61 adult rabbits between December 2020 and June 2021. All of the female rabbits except one were pregnant at the time of capture which resulted in an additional 28 rabbits being born in the Rabbitats sanctuary. A total of 85 rabbits were vaccinated for RHD and spayed or neutered, which resulted in a cost of over \$17,000 of which the City paid \$15,000.

2021 Program

As a result of the information gathered from the Dover Neighborhood Area Pilot Project, staff engaged Rabbitats to address the growing public concern regarding feral rabbits on public property with the intent to manage the rabbit population where possible. Based on the results of the Dover Neighbourhood Park Pilot Project, the City entered into an agreement with Rabbitats to respond to reports of feral rabbit sightings in Richmond in order to humanely capture, spay or neuter and house these rabbits in one of their sanctuaries. Rabbitats were successful in responding to multiple calls for service resulting in the removal of 118 rabbits from public property, and housing them indefinitely in their sanctuaries at an expense of \$20,000 to the City. Recognizing that rabbits are migratory and prolific, the City worked with Rabbitats to also respond to residents' concerns regarding rabbits on private property. While the City registered these complaints, no additional support was given regarding the removal of these rabbits.

Strategy for Managing Feral Rabbits in 2022

Despite the implementation of the aforementioned management practices, feral rabbit populations do not appear to be declining. Impacts to the environment are evident, and based on reported sightings, rabbits are moving into ecologically sensitive areas such as Terra Nova Park and new landscapes such as Aberdeen Park and Paulik Neighbourhood Park.

Staff propose a number of actions below which will assist the City to better understand the extent of feral rabbits in the community, including forecasting future trends and potential management strategies. Next steps include actions to increase public awareness of the issue, and work within the evolving regulatory context to develop a response plan best suited within the City's jurisdiction.

Staff will continue to consult with the BC SPCA and FLNRO-RD for best management practices with respect to rabbits in Richmond.

Rabbitats 2022 Program

Given that feral rabbits will require ongoing management in 2022, staff propose to engage with Rabbitats to manage the humane capture, spaying/neutering and housing of feral rabbits captured on public property. The City will reimburse Rabbitats for the costs of spaying/neutering as per the program in the previous two years. The number of rabbits captured will correspond

with Rabbitats capacity to both capture and house them in one of their sanctuaries. The fee for service will not exceed \$15,000 and will be funded through existing operating budgets. A final agreement will be contingent on negotiations between Rabbitats and staff and will be essentially a continuation of the pilot program established in 2020. The effectiveness of this program (e.g. the number of rabbits captured, overall impact to the environment, cost efficiencies, etc) will be evaluated in conjunction with the results of the Feral Rabbit Management Study.

Expert Support Services

Staff will investigate the development of a Feral Rabbit Management Study either as an independent document or an additional component to the City's existing plans. The intent is to develop a comprehensive, proactive and sustainable response specific to feral rabbits. Staff plan to develop this study with the assistance of qualified environmental professionals and stakeholders who have experience with managing feral rabbits and other invasive species.

While the proposed study would focus primarily on City-owned properties, impacts to private property will be considered as feral rabbits freely move throughout the City. Staff currently anticipate that the initial step in the study would be to identify the nature and extent of the feral rabbit population throughout the City on both public and private property. Further investigation is required to better understand where feral rabbits are currently concentrated, possible sources of increase (aside from reproduction) and overall population trends. The impact on existing native flora and fauna (including any possible native rabbit populations present in Richmond), and the financial impact to City-owned natural areas, park spaces, infrastructure and facilities will also be investigated. Finally, the study will include a broad survey of management approaches employed by other municipalities. This precedent study will assist staff in assessing the most appropriate management approach for Richmond. The cost of this study, subject to finalizing the Scope of Work with the selected contractor, is expected not to exceed \$25,000 and will be funded through the existing Invasive Species operating budget.

Public Awareness Campaign and Ongoing Monitoring

In consultation with Rabbitats and the Provincial Government, staff have identified that the number of feral rabbits in the environment can be attributed to their prolific reproductive cycles and the release of these domestic pets in the community. While bylaws are in place to limit this activity, and there is a prohibition on the sale of these animals in Richmond, residents still continue to contravene these bylaws. Enforcement is challenging as offenders must be caught in the act. To this end, staff propose supporting existing bylaws through the development of a concerted public education program.

The purpose of the program would be to develop social media and digital material which will inform residents how their decisions impact Richmond's natural environment. Staff will draw on the research and best practices of allied organizations to develop this campaign. For example, the Invasive Species Council of BC is currently developing a new public education strategy to augment its current "Don't Let It Loose" program (<https://bcinvasives.ca/invasives/european-rabbit/>). Their program, similar to other invasive species educational outreach programs seeks to inform the public of the impact of invasive species, and to educate and empower them in order to address the issue.

Messaging and education would focus on how residents need to know the detrimental impacts of releasing rabbits in public landscapes, the possibility of exposing their former pet to RHD, the impacts of feeding rabbits in public areas and the need to spay or neuter a rabbit as a model of responsible care for ones pet. Additionally, residents may not know what resources are available in the community concerning lawful and responsible options regarding releasing rabbits on public land.

Staff recognize that a public awareness campaign will be a component of an overall strategy to manage feral rabbits in Richmond. The content of the campaign will focus on core messaging to convey the detrimental impacts that rabbits have in our community consistent with messaging released by allied organizations such as the Invasive Species Council of BC.

Financial Impact

The proposed contract with Rabbitats, study and public awareness campaign will be funded through the existing Invasive Species budget.

Conclusion

While rabbit control efforts have been successful where employed, the prolific breeding of rabbits often outcompete the current capacity of service providers.

The City will continue to manage feral rabbits through the lens of the current Provincial legislation and their designation as an invasive species. The Feral Rabbit Management Study is intended to provide a framework for action, and the development of this action plan will address feral rabbit impacts to natural and managed ecosystems and landscapes. While the proposed Feral Rabbit Management Strategy is being developed, staff will immediately develop an enhanced public awareness campaign to increase Richmond residents' understanding of the impact feral rabbits have on the environment. Staff will also continue to work with relevant local and provincial stakeholders, including the Province, to identify the best approach for Richmond to control rabbits in the public realm. While the City will continue to work within the framework of the current legislation, staff will incorporate any proposed changes to *the Act* by the Province in a manner which is best suited for Richmond and the environment.



Alexander Kurnicki
Manager, Parks Programs
(604-276-4099)



Magnus Sinclair
Coordinator, Parks Programs
(604-247-4453)