

2013-07-30

Re: Domestic Rabbit Abandonment

Thank you for meeting with us regarding the above last Friday (July 26) at your constituency office. I want to recap our conversation to further our discussion.

1. To address the pressing need of rescuing abandoned domestic rabbits by reducing the current bureaucratic process which does not help domestic rabbits, we recommend that abandoned domestic rabbits be removed from *the BC Wildlife Act*, and Schedule C which identifies them as an invasive species. The reasons are as follows:
 - a) Abandoned domestic dogs and cats are not classified as wildlife nor are they native species. Why then do we single out one type of domestic pet (rabbits) to be classified as wildlife? We should either apply the same reasoning to all pets or no pets. What about pet birds when they are lost? We do not classify them as wildlife, but in fact, they are the type of pets closest to wildlife in that they are the least domesticated, and certainly non-native.
 - b) We believe that the *BC Wildlife Act* is jointly administered by MOE and MFLNRO. Although I live in the TOL, I wanted to start the discussion with an MLA close to home.
 - c) Because pet rabbits multiply quickly, the ability to capture them for sterilization and medical attention is even more crucial than that for dogs and cats, which already can be readily captured as they are not classified as wildlife upon abandonment. Thus rabbit rescue organizations require government legislation to allow easy access for them to do their work, and not to impede their efforts.
2. To strengthen SPCA's enforcement power, we recommend an additional provision to the *Prevention of Cruelty to Animals (PCA) Act*, specifically outlining graduated penalties for pet abandonment based on species.
 - a) In particular, cats-dogs-rabbits, in order of increasing fines.
 - b) This is because rabbits are prey animals and CANNOT acquire proper nutrition in the wild or hunt for food, and are strictly herbivores.
3. To coincide with this SPCA enforcement provision, we also recommend a public awareness campaign/ program relating the consequences of fines associated with pet abandonment to pet guardians at every sales source, whether at pet stores, breeders, rescue shelters, or adoption agencies.
 - a) This will impress upon potential pet owners of their responsibilities and associated penalties if they contravene the *PCA Act*.
 - b) In particular, it will help to elevate the status of rabbits in pet ownership.

4. To control the numbers of unwanted rabbits, we recommend that the BC government adopt the UBCM motion to ban sales of pet rabbits in stores province-wide. (2012 Sept)
 - a) Even if everyone who desires a rabbit adopts one, there would still be rabbits left over at rescue agencies. Banning sales of pet rabbits at stores will help to prevent adding to the problem of too many unwanted rabbits.
5. To help ease the burden of rabbit rescue organizations which have already reached their capacities, we enlist the provincial government's sanction for municipalities to create refuge centres in three urban centres of the province where the problem of rabbit proliferation is the highest: Greater Victoria District, Metro Vancouver, and the Okanagan. The municipalities within each region could contribute by giving land to rescue groups operating in these cities to set up the refuge centres. This would allow a concerted effort to better serve the rabbits for adoption and living out their lives at the refuge centres.
6. Finally, to control the source of rabbits being born, we encourage the implementation of a Best Practices Code for breeders and agricultural groups.
 - a) Best Practices (Bill M214, Standards of Care for Breeders of Companion Animals) for dogs and cats was tabled earlier by MLA Jane Thornthwaite and will be re-introduced again with rabbits added in. Again to raise the status of rabbits, so they are not seen as disposable pocket pets.

Sincerely,
Patricia

Patricia Tallman, PhD
Environmental Policy Consultant

Carmina Gooch, Executive Director
Rabbit Advocacy of BC

Lisa Hutcheon, Executive Director
SARS (Small Animal Rescue Society)

Olga Betts, Executive Director
Vancouver Rabbit Rescue and Advocacy