

## Note • Bill S-15

# Amending federal statutes to regulate activities related to elephants and great apes

Legislative  
Costing  
Note



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Bill S-15 proposes to amend the Criminal Code and the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA)<sup>1</sup> to ban: a) the possession; b) the breeding or the impregnation in captivity; and c) the international and interprovincial trade of elephant and great apes in Canada, subject to certain exceptions. These exceptions include elephant and great apes kept in the best interests of their welfare or for the purpose of a scientific research or conservation program, among others. The bill would create a permit system in relation to these activities.

Environment and Climate Change Canada (ECCC) is assumed not to recover any of the costs associated with administering the provisions of Bill S-15<sup>2</sup> and the bill is assumed to come into force on April 1<sup>st</sup>, 2025.

PBO estimates total net cost of the bill to be \$8 million over five years, beginning in 2025-2026.

## 5-Year Cost

\$ millions

Fiscal year	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	Total
Total cost	2	2	2	1	1	8

## Notes

- Estimates are presented on an accrual basis as would appear in the budget and public accounts.
- A positive number implies a deterioration in the budgetary balance (lower revenues or higher spending). A negative number implies an improvement in the budgetary balance (higher revenues or lower spending).
- Totals may not add due to rounding.

<sup>1</sup> Bill S-15, "An Act to amend the Criminal Code and the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act". 1st Session, 44th Parliament.

<sup>2</sup> ECCC does not recover the costs associated with administering the permit scheme under WAPPRIITA and is intending not to recover any of the costs associated with administering the provisions of Bill S-15.

## Estimation and Projection Method

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The total cost of administering the provisions of Bill S-15 consists of three categories of costs: policy development and permitting costs; enforcement costs; and data management costs.

The development and permitting costs and the enforcement costs required to administer the provisions of the bill were estimated using the costs provided by ECCC, the number of additional full-time equivalent employees needed to administer the provisions of the bill, and the salaries, employment benefits and pension plans' costs of those additional employees. The number of additional full-time equivalent employees was provided by ECCC. Salaries, employment benefits and pension plans' costs were calculated using the Treasury Board Secretary and Statistics Canada data. Salaries were projected using the PBO forecasts of salary increase.

Data management costs were provided by ECCC.

## Sources of Uncertainty

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The main sources of uncertainty relate to data management costs including the cost of the new IT tracking system that would be developed and maintained to monitor and track elephants and great apes kept in captivity. No behavioural response is expected. The bill was amended by the Standing Senate Committee on Legal and Constitutional Affairs to expand the restriction on possession, breeding, and trade of animals to include designated animals, such as non-native large cats, upon recommendation of the Minister of Environment. The inclusion of additional animals may result in an increase in costs, due for example to additional full-time equivalent employees.

## Note prepared by

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## Data Sources

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**Policy Development and Permitting costs, Enforcement costs and Data Management costs associated with administering the provisions of Bill S-15**  
Environment and Climate Change Canada

**Salary of additional full-time equivalent employees**

Treasury Board Secretary

**Employment Benefits and Pension Plans' costs of additional full-time equivalent employees**

Treasury Board Secretary and Statistics Canada

**Salary increase**

PBO's economic model

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