ANIMAL
ALLIANCE
OF CANADA

Animal Protection Through Education & Advocacy

March 23, 2022

Chair and Members,
Economic and Community Development Committee
10th Floor, West Tower, City Hall,
100 Queen Street West,
Toronto, ON M5H 2N2
Email: ecdc@toronto.ca

c.c. Matthew Green

Dear Chair and Committee Members,

Re: EC28.10: Final Recommendations on the UrbanHensTO Backyard Hens Pilot Programme

Thank you for the opportunity to comment on Report EC28.10 which makes final recommendations regarding the UrbanHensTO Backyard Hens Pilot Programme.

Recommendations:

Animal Alliance of Canada recommends that Council defer the expansion of UrbanHensTO to the entire City for the following reasons:

a. additional financial costs during a financial shortfall;
b. increased incidents of avian influenza, including in backyard flocks; and
c. animal welfare issues related to possible constraints and orders imposed by the Canadian Food Inspection Agency (CFIA) and the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) due to the spread of avian influenza.

Financial Impact – Increased Costs to the City Despite City Budget Shortfall:

This year City Council approved a $14.99 billion operating budget with an identified shortfall of $1.4 billion and, according to city staff, if the shortfall is not addressed approximately $300 million in capital projects would have to be cancelled as well as $1 billion in repair work.

It is under these financial constraints that this Committee is considering expanding the UrbanHensTO to include all Wards of Toronto. In order to implement the programme, the staff report identifies the annual financial impact to the City to be an approximate increase of $347,000 on the operating budget.

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Much of the revenue will be recouped in the first and second year, with $211,400 in registration revenues and $62,440 from re-inspection fees. However, in the third year and beyond, the revenue recouped from licensing renewal fees will drop to $47,600, leaving approximately $300,000 in City costs to operate the programme.

It is unclear at this point how much money the City will receive from the federal and provincial governments to make up for the $1.4 billion shortfall.

The question becomes, **why would the City take on additional costs for a programme that benefits an estimated less than 1% of eligible households in the City when other programmes and repair work, affecting larger number of residents, are at risk of being trimmed back or cut entirely from the budget?**

Avian Influenza Affects Backyard Chickens:

More recently, bird flu has been identified in a number of US states, in Nova Scotia and Europe, Asia and Africa. Headlines include:

- Avian flu outbreaks expand to backyard flocks in Maine, NY
- Federal Agency: Bird Flu Detected in Backyard Michigan Flock
- CFIA says case of avian influenza detected in N.S. backyard flock

CFIA updates on its investigation into avian influenza (H5N1) in Nova Scotia:
(https://inspection.canada.ca/animal-health/terrestrial-animals/diseases/reportable/avian-influenza/detection-of-highly-pathogenic-avian-influenza-h5n/eng/1640207916497/1640207916934)

- On February 3, 2022 the CFIA confirmed the presence of highly pathogenic avian influenza (AI), subtype H5N1, in a commercial flock in western Nova Scotia.
- On February 11, 2022, the CFIA confirmed highly pathogenic avian influenza (AI), subtype H5N1, at a mixed farm in western Nova Scotia, which includes poultry and products for local sale. This follows confirmed detections of the same strain of AI in Newfoundland and Labrador and more recently in wild birds, a backyard flock and a commercial farm in Nova Scotia.
- On March 15, 2022, the CFIA confirmed the presence of highly pathogenic avian influenza (AI), subtype H5N1, in a non-commercial flock in southern Nova Scotia. This backyard flock does not produce birds or eggs for sale.

CFIA updates on its investigation into avian influenza (H5N1) in Newfoundland and Labrador: (https://inspection.canada.ca/animal-health/terrestrial-animals/diseases/reportable/avian-influenza/detection-of-highly-pathogenic-avian-influenza-h5n/eng/1640207916497/1640207916934)

- On December 20, the CFIA confirmed the presence of highly pathogenic AI, subtype H5N1, at a multi-species exhibition farm in the Avalon Peninsula on the island portion of Newfoundland and Labrador. This exhibition farm does not produce birds for sale. As the infected birds were located on an exhibition farm, and no other cases resembling Avian Influenza have been reported in the vicinity of the farm, Canada's status as 'free from AI' remains in place in accordance with the OIE guidance.
- On January 9, 2022, the Canadian Food Inspection Agency (CFIA) confirmed the presence of highly pathogenic Avian Influenza (AI), subtype H5N1, at an additional farm in the Avalon Peninsula on the island portion of Newfoundland and Labrador. This small flock farm does not produce birds for sale.
- On March 17, 2022 the Canadian Food Inspection Agency's (CFIA) disease investigation and outbreak response activities have concluded at one of the two affected locations in the Avalon Peninsula on the island portion of Newfoundland and Labrador.

Avian Flu Scan by the Centre for Infectious Disease Research and Policy:

In the Avian Flu Scan for March 8, 2022, the Centre for Infectious Disease Research and Policy documented the following cases: (https://www.cidrap.umn.edu/news-perspective/2022/03/avian-flu-scan-mar-08-2022)

Avian flu strikes more locations in Iowa, Missouri: (https://www.cidrap.umn.edu/news-perspective/2022/03/avian-flu-scan-mar-08-2022)

- Iowa yesterday reported a second highly pathogenic avian flu outbreak, this time affecting a commercial turkey farm, and Missouri recently reported a second event, which occurred in a backyard flock.

- In a statement, the Iowa Department of Agriculture and Land Stewardship (IDALS) said the US Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) confirmed the virus in a commercial turkey flock in Buena Vista County, which is in the northwestern part of the state. The location is about 100 miles north of a recent outbreak reported in a backyard flock in Pottawattamie County. According to the USDA's outbreak page, the Buena Vista County turkey farm had 50,000 birds.

- Missouri's second outbreak affected a backyard flock housing 51 birds in Bates County, according to an update from the Missouri Department of Agriculture (MDA). Last week, officials reported an initial outbreak, which involved a commercial broiler facility in Stoddard County that led to the loss of 294,751 birds.

Avian Influenza in Ontario:

- In 2000, commercial birds in Ontario, were found with a H5N1 low pathogenicity avian influenza (LPAI). The virus was also detected in turkeys in 1984.
- In 2015 there was an outbreak of H5N2 in a turkey flock in Oxford County, Ontario.
- In 2016 the CFIA has imposed a quarantine zone around a St. Catharines, Ont., farm where thousands of ducks need to be killed.

Why Risk Avian Influenza:

In April 2004, the World Health Organization (WHO) confirmed the presence of avian flu in Canada. According to an article published in the National Centre for Biotechnology Information, titled, "*WHO confirms avian flu infections in Canada*", the author Barbara Kermode-Scott writes:

> "Canada has ordered the slaughter of about 19 million birds, including chickens, turkeys, ducks, geese, and pigeons, at 20 poultry farms in an effort to eradicate an outbreak of bird influenza. The World Health Organization has confirmed that there have been two human cases of avian influenza A (H7) in British Columbia, Canada. Both cases were mild.
>
> On the basis of epidemiological information provided by Health Canada, WHO has raised the global pandemic preparedness level for the Canadian outbreak from 0.1 to 0.2—the same level as the global preparedness level for the avian flu outbreak in Asia. In Asia, the highly pathogenic avian flu virus strain A (H5N1), has been responsible for 34 reported illnesses in humans and 23 deaths."

An article in the New York Times dated February 24, 2022, titled "*Avian Flu Spread in the U.S. Worries Poultry Industry*", the author Andrew Jacobs writes:

> "Although the danger to humans is low, scientists are keeping a close eye on the virus, the Eurasian H5N1, which is closely related to an Asian strain that has infected hundreds of people since 2003, mostly those who had worked with infected poultry. That virus does not spread efficiently among humans but it is extremely deadly, with a fatality rate of 60%, according to the Centres for Disease Control and Prevention. The strain

currently spreading across the United States has not jumped to humans, but virologists and epidemiologists say the mounting infections among birds is worrisome because it increases the possibility that the virus could mutate in way that makes it more infectious to people."

Consequence for the birds both commercial and backyard:

The main approach to bird flu containment is mass extermination.

- February of 2004, the US state of Delaware killed 89,000 chickens at just two farms in an attempt to control avian influenza.
- March of 2004, 118,000 chickens were exterminated on a single farm on a single day in Maryland (MDA).
- January and February 2004, 50 - 80 million birds were exterminated in Asia
- In 2004, in Vietman and Thailand more than 100 million birds were slaughtered, while on the Eastern Cape of South Africa, 27,000 ostriches were destroyed (pro-MED-mail).
- In 2004, Canada killed 19 million birds to control the disease in BC.
- In 2022, the USDA confirms highly pathogenic avian influenza in commercial and backyard flocks, where 22 of the 50 infected locations identified were backyard flocks (Appendix A – Chart).

Consequences for backyard chickens in Toronto:

Should Council decide to allow Toronto residents to have backyard chickens, it should do so with the knowledge that abandoned or surrendered birds in the possession of Toronto Animal Services may no longer be placed outside of Toronto in order to reduce the possibility of transmission of disease from one jurisdiction to another. This is likely to result in the euthanasia of the birds even though they are healthy and could be adopted outside of Toronto.

Council should also consider prohibiting the "rent-a-chicken" concept. The birds and coop are provided and when the birds are no longer wanted, they are removed by the supply company. Again, this means moving birds from one community to another with the chance of bringing infected birds in Toronto or spreading the infection outside Toronto when the birds are removed.

What remains unclear:

1. What facilities are available for these birds at Toronto Animal Services (TAS)? The number of stray or surrendered chickens and roosters are likely to grow with the expansion of the programme.
2. What happens to the stray and surrendered birds should TAS be unable to place them in homes outside Toronto?

3. Is there sufficient veterinary services for chickens in Toronto? A veterinary search showed only one practice in Toronto that is certified to handle chickens.
4. Are those who are part of the UrbanHensTO programme required to provide veterinary care if their chickens become ill.
5. What happens to the chickens who are part of the Rent-A-Chicken programme and are picked up by the company when the chickens are no longer wanted?

Thank you for considering our comments.

Sincerely,

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Appendix A

USDA 2022 Confirmations of Highly Pathogenic Avian Influenza in Commercial and Backyard Flocks- March 21, 2022(https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/animal-disease-information/avian/avian-influenza/hpai-2022/2022-hpai-commercial-backyard-flocks

Note: Non-poultry refers to non-commercial birds

State	County	Date Confirmed	Flock Type	Flock Size
South Dakota	Hutchinson	3/20/2022	Commercial Turkeys	49,000
Iowa	Warren	3/20/2022	Backyard Mixed Species (non-poultry)	11
Maine	York	3/19/2022	Backyard Mixed Species (non-poultry)	38
Maine	Knox	3/19/2022	Backyard Mixed Species (non-poultry)	8
South Dakota	Kingsbury	3/18/2022	Commercial Turkeys	39,000
South Dakota	Hanson	3/18/2022	Commercial Turkeys	20,233
Maryland	Cecil	3/18/2022	Commercial Pullet Chickens	315,000
Kansas	Dickinson	3/18/2022	Backyard Mixed Species (poultry)	245
New Hampshire	Rockingham	3/17/2022	Backyard Mixed Species (non-poultry)	80
Delaware	Kent	3/17/2022	Commercial Broiler Chickens	156,800
Kansas	Sedgwick	3/17/2022	Backyard Mixed Species (non-poultry)	6
Maine	Lincoln	3/17/2022	Backyard Mixed Species (non-poultry)	29
Iowa	Buena Vista	3/17/2022	Commercial Layer Chickens	5,347,511
Missouri	Ralls	3/15/2022	Backyard Mixed Species (non-poultry)	75
Nebraska	Merrick	3/15/2022	Backyard Mixed Species (non-poultry)	90
Wisconsin	Jefferson	3/14/2022	Commercial Layer Chickens	2,757,768
Maine	York	3/14/2022	Backyard Mixed Species (non-poultry)	173

State	County	Date Confirmed	Flock Type	Flock Size
Maine	Lincoln	3/12/2022	Backyard Mixed Species (non-poultry)	70
South Dakota	Charles Mix	3/12/2022	Commercial Turkeys	36,000
Kansas	Franklin	3/11/2022	Backyard Mixed Species (poultry)	264
Illinois	McLean	3/11/2022	Backyard Mixed Species (non-poultry)	35
Maryland	Cecil	3/10/2022	Commercial Layer Chickens	664,061
Iowa	Taylor	3/10/2022	Commercial Layer Chickens	915,925
Missouri	Lawrence	3/9/2022	Commercial Turkeys	37,770
Delaware	New Castle	3/8/2022	Commercial Pullet Chickens	265,000
Maryland	Queen Anne's	3/8/2022	Commercial Broiler Chickens	150,000
Missouri	Jasper	3/8/2022	Commercial Turkeys	25,015
Iowa	Buena Vista	3/6/2022	Commercial Turkeys	49,816
South Dakota	Charles Mix	3/5/2022	Commercial Mixed Species	47,330
Missouri	Bates	3/4/2022	Backyard Mixed Species (non-poultry)	51
Missouri	Stoddard	3/4/2022	Commercial Broiler Chickens	294,818
Maryland	Cecil	3/4/2022	Commercial Layer Chickens	496,272
Indiana	Dubois	3/2/2022	Commercial Turkeys	16,494
Connecticut	New London	3/1/2022	Backyard Mixed Species (non-poultry)	155
Iowa	Pottawattamie	3/1/2022	Backyard Mixed Species (non-poultry)	42
New York	Dutchess	2/24/2022	Captive Wild Birds (non-poultry)	195
New York	Ulster	2/24/2022	Backyard Mixed Species (non-poultry)	65
Indiana	Dubois	2/24/2022	Commercial Turkeys	35,988
Michigan	Kalamazoo	2/23/2022	Backyard Mixed Species (non-poultry)	43

State	County	Date Confirmed	Flock Type	Flock Size
Maine	Knox	2/23/2022	Backyard Pet Chickens (non-poultry)	96
Indiana	Greene	2/23/2022	Commercial Turkeys	48,211
Indiana	Greene	2/23/2022	Commercial Turkeys	15,400
Delaware	New Castle	2/22/2022	Commercial Poultry	1,146,937
Maine	Knox	2/19/2022	Backyard Mixed Species (non-poultry)	27
New York	Suffolk	2/18/2022	Backyard Pet Chickens (non-poultry)	8
Indiana	Dubois	2/16/2022	Commercial Turkeys	26,625
Kentucky	Webster	2/15/2022	Commercial Turkeys	53,286
Virginia	Fauquier	2/12/2022	Backyard Mixed Species (non-poultry)	90
Kentucky	Fulton	2/12/2022	Commercial Broiler Chickens	231,398
Indiana	Dubois	2/8/2022	Commercial Turkeys	29,015