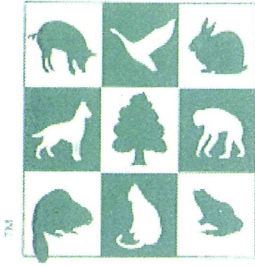
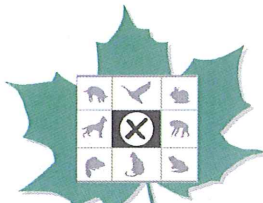


September 19, 2016.



**Animal Alliance
of Canada**



**Animal Alliance
Environment Voters
Party of Canada**

Chair and Members,
Licensing and Standards Committee,
City of Toronto 100 Queen Street West,
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Dear Members, Licensing and Standards Committee,

LS13.4 Responsible Dog Ownership: Mitigating Risks of Dangerous dogs.

Thank you for the opportunity to comment on this report. The following are comments regarding the proposed changes to Toronto Municipal Code, Chapter 349.

The key to successful initiatives such as proposed in LS13.4 is a balance between community buy-in and compliance, and effective enforcement. Given that by-laws are enforced on a complaint basis, community buy-in and compliance is very important.

1. **New Definitions:** If the City wants effective measures to deal with dangerous dogs and dog bite incidents, definition clarity is important.
 - a. **Defining dangerous dogs:** The proposed definition needs greater clarity. For example, was the bite provoked or unprovoked and what were the circumstances under which the bite occurred? If a dog severely bites someone who breaks into a home or a backyard, is that dog dangerous? Does the size of the dog matter when defining who is dangerous?
 - b. **Defining "attack":** The definition should address whether the attack was provoked or unprovoked, including the specifics of the "attack". Does the "act of aggression" include growling and snarling but no contact or direct contact, including biting? Is the dog dangerous if the contact is nipping with no skin broken?
 - c. **Defining menace:** This definition is entirely unclear as to its meaning. Is growling menacing? If small dogs growl and lunge are they menacing? If a dog is on a leash or confined to his or her property, and growls, is that dog menacing?

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Public Safety:

Despite the City's requirement to license dogs, only 55,000 (24%) of the estimated 230,000 dogs were licensed in Toronto in 2013, the most recent stats. So the question becomes how will the City ensure that dogs deemed dangerous are licensed and microchipped?

The requirement for training is an excellent suggestion. However, a prohibition from off-leash areas presents a problem as to how to provide adequate exercise for dogs that will be restricted in their activity.

The requirement to post a warning sign on the properties where dogs deemed dangerous reside singles out the families and the dogs to possible neighbourhood persecution, even where the families are responsible and follow all the City requirements for dealing with such animals.

Prohibition on pronged or choke collars for tethering: Agreed.

Authority to enter private property: The proposal to grant the City the authority to enter private property requires a proper rationale as to why the City would need such authority.

Three hour time limits on tethering:

Tethering, chaining and confinement all contribute to increased biting incidents. A three hour tethering time is a good start but should be extended to chaining, confinement and leaving dogs out of doors, not just to those tied up outside coffee shops. In addition, the by-law should consider variables such as very hot and very cold days where three hours might be too long, types of dogs tethered and types of shelters available to the tethered, chained and confined animals.

An article in the American Veterinary Medical Association points out that 26-28% of dogs involved in fatal attacks were chained at the time. (Journal of the American Veterinary Medical Association: Dog Bite Related Fatalities from 1979 through 1988 by J. Sacks. R. W. Sattin, & S. E. Bonzo. Volume 262, pages 1489-1492.)

Also in a summary of chained dog attack, PETA points out that since 2003, at least 300 Americans have been injured or killed by chained dogs. ([Chained Dog Attack Summaries](#) by PETA.)

Conclusion: We look forward to further details as to definitions and rationales.

Sincerely,



Liz White

Appendix #1

Chaining and tethering information

- Chaining or tethering has been declared illegal in many communities. See [Table of State Dog Tether Laws](#) by Animal Legal and Historical Center, and [Dogs Deserve Better](#), a website that advocates against chaining and penning dogs. California was the first state in the nation to prohibit chaining.
- See Health and Safety Code Section 122335, the [California law prohibiting tethering](#). A minority of USA states have anti-chaining laws (see, for example, [Texas](#)) or currently are considering the enactment of such laws. See [Dogs Deserve Better: U.S. Anti-Tethering Legislation By State](#).
- Chaining also is inhumane. [Chaining and Tethering](#) ;by the Humane Society of the US.
- See [The Public Safety and Humane Implications Of Persistently Tethering Domestic Dogs](#), by New Mexico Department of Public Safety (2008), for an in-depth review of this issue.