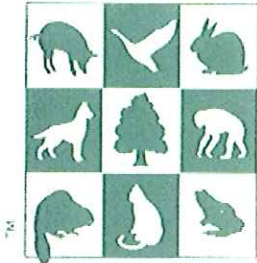


November 29, 2016.



**Animal Alliance
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,

LS15.1 Amendments to Chapter 349, Animals – 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 LS15.1 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.

New Definitions: If the City wants effective measures to deal with dangerous dogs and dog bite incidents, definition clarity is important.

- a. Defining dangerous dog: Is 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". The Dunbar scale is an assessment of the severity of biting problems based on an objective evaluation of wound pathology but does not address the circumstances of the bites.
- 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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- d. Defining dangerous attack: Again, it is unclear whether the definition will include provoked or unprovoked attacks and how those might be handled differently. If a person is assaulted and the dog seriously attacks the assailant, is the dog dangerous?

Proposed requirements for owners of dangerous dogs:

Licensing and microchipping: This should be a requirement for all companion dogs and cats in the City. Current approaches to license dogs is clearly not working given that 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?

Training: 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.

Warning signs: The requirement to post warning signs on the properties where dogs are deemed dangerous seems reasonable. In addition, if someone enters a property where a dangerous dog sign is posted, what happens to the dog if he or she reacts aggressively?

Tethering:

Tethering, chaining and confinement all contribute to increases in biting incidents.

- 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.

A three hour tethering time is a good start but should be extended to chaining, confinement and leaving dogs out of doors. In addition, the by-law should consider variables such as very hot and very cold days, types of dogs tethered and types of shelters available to the tethered, chained and confined 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 is a serious matter and requires a proper rationale as to why the City would need such authority and under what conditions the authority would be exercised.

Sincerely,



Liz White