

Animal Alliance
of Canada



June 13, 2017.

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

LS20.1 Prohibited Animals Review

Backyard Hens in Toronto

We are writing in support of the staff's recommendation to keep chickens on the prohibited animals list for the following reasons:

1. **2017 Multistate outbreak of human Salmonella linked to backyard chickens:** In a news report posted on June 1, 2017, the Centres for Disease Control and Prevention reported a multistate outbreak of 8 different types of Salmonella bacteria linked to backyard chickens. As of May 25, 2017, 372 people were infected with 71 people hospitalized. Of the 372, 36% were children under 5 years of age.
2. **Shelters are already overcrowded:** Although the number of animals admitted to Toronto Animal Services (TAS) has declined due to progressive animal management, the number of available cages has also been reduced with the closure of the south shelter. During the spring, summer and fall months, TAS continues to experience pressure for available cage space. Adding more animals, namely abandoned and abused chickens to facilities without appropriate housing for them and in crowded circumstances is not in the best interests of the chickens, the other animals in the shelter or the staff.
3. **Additional costs without either monetary or staffing resources:** Special housing facilities will be required. Chickens cannot be housed with dogs and cats who would be considered predators and would be a source of significant stress to the birds. Additional costs would be required for their food, shelter, transportation and veterinary care and additional by-law enforcement responsibilities at a time when TAS has very limited funds.

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Neither the BC SPCA or the Vancouver Animal Control can accommodate chickens even though chickens are allowed in certain areas. As the BC SPCA writes, "Please note: Neither the Vancouver Animal Control facility nor the BC SPCA Vancouver Animal Shelter have facilities to house unwanted chickens. Likewise, there are no facilities to accommodate birds seized from individuals who contravene sections of the community bylaw or the BC Prevention of Cruelty to Animals Act."

<http://www.sPCA.bc.ca/animal-issues/farm-animal-welfare/farm-animals/egg-laying-hens/backyard-chickens.html?referrer=https://www.google.ca/>

4. **Humane Issues:** The humane keeping of chickens requires a high degree of knowledge and expertise regarding their care, feeding and housing. Although individuals can acquire expertise, the reality is that many people are likely to obtain chickens without the knowledge or ability to humanely care for them. Chicks can be mailed or couriered the purchaser, like other "parcels" (<http://www.canadapost.ca/tools/pg/manual/PGnonmail-e.asp#1378261>).

This, of course, presents questions of humane conditions for the chicks and additional enforcement responsibilities for the TAS. Even if the by-law prohibits the acquisition of chicks through the mail, there are no real enforcement provisions to prevent this from happening. In addition, a lack of knowledge about chickens would likely include an inability by the owner to detect illness or disease symptoms. Diseases and other health problems, left untreated, will result in suffering and in some cases death, and could potentially constitute a human health risk.

Finally, what happens to the chickens who no longer produce the desired number of eggs, at the young age of 18 to 24 months? Obviously the birds will be disposed of in some manner, including backyard slaughter when egg production begins to decline.

With regard to backyard slaughter, a March 8, 2012 Bloomberg Business Week article titled "Kill-It-and-Eat-It Locavores Give Cities Indigestion" states, "In 2010 the USDA surveyed 425 people who keep chickens in four cities—Denver, Miami, Los Angeles, and New York. About 10 percent said they had killed their birds for food in the past year." <http://www.businessweek.com/articles/2012-03-08/kill-it-and-eat-it-locavores-give-cities-indigestion>

5. **Veterinary care**—Veterinarians in the city do not specialize in the treatment of chickens, raising the specter of sick and suffering chickens with no available care and the possibility of disease spreading into wild or captive bird populations. There is also the question of whether urban poultry owners would ensure their chickens receive prompt and appropriate veterinary treatment given the costs and limited veterinarian access.
6. **Slaughter**—It is unlikely that all urban chicken owners will take their chickens to a veterinarian for euthanasia, as they would their dog or cat. Also, they may want to

eat the chickens, once they are no longer productive egg-layers which leads to the possibility of backyard slaughter. Although this would be prohibited in the by-law, enforcement would be extremely difficult. This of course raises humane and public health concerns and increases by-law enforcement responsibilities for Toronto Animal Services.

7. **Human/wildlife conflicts:** Toronto is home to predators such as raccoons, skunks, foxes, great horned owls and coyotes, with raccoons, coyotes and skunks being the subject of human/wildlife conflict media stories. These animals may prey on chickens, particularly those kept in non predator-proof structures, thereby providing attractants and increasing the incidents of human/wildlife conflicts. Bedding, food and droppings are attractants to mice, rats, flies and other insects, all species who are generally unwanted around homes, under porches and in backyards, sheds and garages.
8. **Regulation and enforcement** – It might be argued that the above issues could be addressed by a system of standards and regulations set out in municipal bylaws. A licensing system could mandate appropriate housing, care, feeding, veterinary care and so on. However, the reality is that municipalities have traditionally been reluctant to put in place such regulations and almost certainly would not have the ability to enforce them. Municipalities simply do not have the resources to adequately enforce animal welfare bylaws pertaining to the currently permitted animals.

Other Prohibited Animals

With regard to the other prohibited animals, we recommend that Licensing and Standards Committee should:

- reaffirm support for the prohibition on MLAPs (mobile live animal programs) as approved by Toronto City Council in December 2016
- expand, strengthen and clarify the process & criteria for adding animals to the prohibited animals list (mentioning that animal welfare was top issue in the survey)
- prohibit animals (such as reptiles, amphibians) that Toronto Public Health and other agencies say pose a health risk to vulnerable members of society in institutional settings, such as daycares, seniors and nursing homes).

Sincerely,

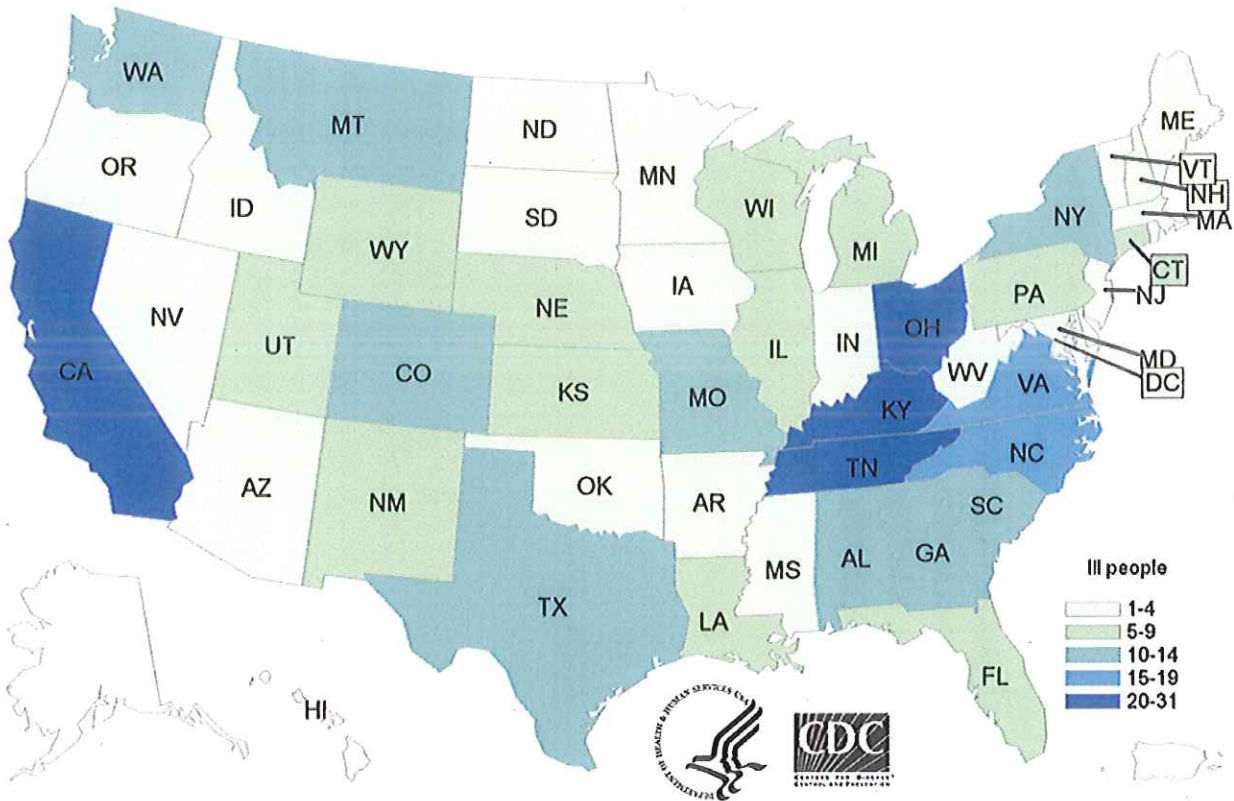


Barry MacKay
Canadian Representative
Born Free



Liz White
Director
Animal Alliance of Canada

2017 Multistate outbreak of human Salmonella linked to backyard chickens



Raising Backyard Hens BC SPCA Views on Urban Chickens

BC SPCA concerns regarding the keeping of urban chickens

- 1.) Potential owners may not have knowledge or skills necessary to provide adequate care to their chickens. Such care includes:
 - The ability to recognize common symptoms of disease, injury, and parasitic infection in chickens, and knowledge of what to do to address such problems.
 - The ability to humanely euthanize a chicken, or access to someone who can (e.g. a poultry veterinarian or experienced chicken farmer).
- 2.) Resources necessary for good health of chickens may not be readily available in an urban environment. For example, access to suitable nutrition and veterinary care may not be readily available in the community.
 - Pet store bird feed may not meet the nutritional needs of chickens. Where will owners purchase the proper chicken feed in quantities suitable for a small backyard flock?
 - Will urban small animal veterinarians in your community allow a chicken into their practice?
 - Will owners know how to humanely handle and transport chickens to veterinary facilities?
- 3.) Hens can live for 8-10 years, yet their productive egg-laying diminishes significantly after the first year. Chickens may stop laying eggs well before they reach the end of their natural life. What will people do with birds that have gone beyond their egg-laying time-frame?
- 4.) Aspects of the urban environment are not compatible with keeping backyard hens. Examples include:
 - Risk of attack from urban wildlife such as coyotes, raccoons, birds of prey, and skunks.
 - Risk of attack from domesticated dogs or cats roaming in the neighbourhood. This may have the unintended side-effect of encouraging aggressive behaviour in dogs.
 - Attraction of rats to chicken feed or to baby chicks.
 - Lack of adequate disposal options for chicken waste and carcasses.
- 5.) Vancouver's Animal Control facility and the BC SPCA's Vancouver Animal Shelter do not have suitable facilities to house chickens that are surrendered. Nor do they have suitable facilities to accommodate birds that are seized from individuals who contravene sections of the community bylaw or the BC Prevention of Cruelty to Animals Act.
- 6.) There are risks associated with chickens contracting avian flu. If there is an outbreak, pet birds are at risk of being included in the cull of all nearby urban chickens.

BC SPCA Farm Animal Welfare Email: farminfo@spca.bc.ca Website:
www.spca.bc.ca/farm

Feral Chickens in Philadelphia



Wild chickens have colonized the 600 block of Pierce Street in South Philadelphia.

<http://archives.citypaper.net/articles/2009/06/18/coop-dtat>

Feral Chickens South Bronx



Just some of the 'wildlife' in the Highbridge section of the Bronx: A kitten perches on a wheel as a rooster - part of a pack of some 36 local fowl – strolls by.

<http://www.nydailynews.com/new-york/bronx/wild-chickens-rule-roost-street-highbridge-section-bronx-article-1.194556#ixzz0f3moi6pz>