



15 July 2022

Mayor John Tory
and the Economic and Community Development Committee
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N1

Dear Sirs and Mesdames:

Re: EC31.5 Updates to Chapter 349, Animals

We are writing to you today with respect to the proposed by-law changes to Chapter 349 that would restrict free-roaming cats in Toronto. As a rescue and as individual cat owners, we agree that owned cats should not be allowed to roam freely in our city, for their own safety as well as for the safety of wildlife.

However, there are an estimated 20,000 feral or “community cats” in the City of Toronto. These cats are not owned — typically, they are the result of lost or abandoned intact cats breeding indiscriminately, then living together in colonies, many managed by rescue groups like our own. These vulnerable cats roam freely in our communities and we are very concerned about how the proposed changes might impact them.

Annex Cat Rescue is a member of the Toronto Feral Cat Coalition, a collaboration of municipal animal controls, humane organizations, rescue groups, and concerned individuals who work together to improve the lives of the homeless and feral cats on Toronto’s streets. As a member of the Coalition, Annex works to help reduce feral cat overpopulation, provide education and awareness in the community, and to advocate on behalf of the feral cats in our city.

In 2010 Toronto Animal Services and Toronto Humane Society started offering free spay-neuter clinics for feral cats. There are volunteers all over our great city who spend countless hours trapping feral cats for spay and neuter and caring for managed colonies. The numbers show our efforts are working.

In 2010, Toronto Animal Services had a total intake of over 11,000 cats and just over 7,000 of those were deemed stray cats. In 2010, 5,446 cats were euthanized. Last year Toronto Animal Services had a total intake of over 2,000 with just over 1,000 of those cats being deemed strays and euthanasia numbers have dropped to 500, less than a quarter of the total intake.

The number of stray and feral cats being turned into city shelters has been reduced dramatically through spay-neuter focus as the most humane approach to managing the cat population. Forcing owners to keep their cats indoors is not the answer at this time. Continued barrier-free access to spay-neuter for communities without availability and public education on the benefits for spay-neuter is a more realistic and compassionate approach.

Truly feral cats are terrified of humans and are unable to live indoors with them. Shelter environments are stressful to even the friendliest of cats who can be overwhelmed by the smells and sounds in the shelter and do not always present their best selves. A shelter environment is detrimental to the health and well-being of a feral cat.

Allowing the proposed by-law changes to pass will mean any cat found on Toronto's streets will be considered free-roaming by the public and in violation of the by-law. This will result in feral cats being turned into our city shelters by well-meaning—and not-so-well-meaning—residents of the city. With no feral colony caregiver to return the cat to, these cats will be fearful and protective in the shelter and will end up being euthanized.

The proposed amendments to the by-law changes will increase the stress put on our city shelters and by-law enforcement officers. Our city services are already spread too thin and rescues and community residents are having trouble getting assistance with serious animal welfare issues such as hoarding situations. We should not be putting more stress on the system. Instead, we should be making changes that allow our shelters and by-law officers more time and resources to attend to matters of importance.

The proposed amendments to the by-law changes are unrealistic and put Toronto's homeless cats at risk. We respectfully request that you reject these changes and instead revert to the original by-law amendments recommended by the staff report that Toronto Animal Services no longer impound cats simply because they are creating a nuisance. Any by-law changes that put Toronto's homeless cats at risk are not in the best interests of the cats or the community.

There is no doubt that cats, specifically feral cats, hunt birds for prey. However, the research paper Toronto Wildlife Centre relies upon for its data is heavily flawed. The estimates provided in the paper are based on data collected in other countries, most notably in the United States where the feral cat population is larger and less controlled. The paper prepared by Peter Blanchard in 2013 specifically says that the predation rates were "derived from data outside Canada." This data is close to ten years old which is significant because TNR services have been widely and easily accessible in Toronto for the past 12 years and the number of feral cats in Toronto has dropped drastically. Additionally, Mr. Blanchard says that "Reliability of the total kill estimate would be improved most by better knowledge of feral cat numbers and diet in Canada, though any data on birds killed by cats in Canada would be helpful." This would suggest that feral cats who are fed in managed colonies are significantly less likely to prey on birds. Finally, the focus on this research paper was "human-related bird mortality" and does not reflect overall bird mortality concerns. Mr. Blanchard reports in his 2013 paper "Dunn and Tessaglia (1994) summarized bird kills reported by feeder-watchers across the U.S. and southern Canada: cats were

responsible for 29% of bird kills for which the predator was identified, ranking second to the Sharp-shinned Hawk (*Accipiter striatus*).” Cats are not the greatest threat to the bird population.

We need by-laws that protect vulnerable cat populations. Consultation with rescue groups, the Toronto Feral Cat Coalition, and volunteer community trappers should be done before changes are made that could negatively impact these cats. We urge you to reject any by-law changes that do not protect feral cats in our communities.

These cats are present in our communities because humans failed them. We must ensure that we do not continue to fail them.

Sincerely,

A handwritten signature in blue ink that reads "April Campbell". The signature is written in a cursive style with a large, flowing initial "A".

April Campbell
Board Member
Annex Cat Rescue