



**ANIMAL
ALLIANCE**
OF CANADA

*Animal
Protection
Through
Education &
Advocacy*

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

c.c. Matthew Green

From: Liz White, Director
Animal Alliance of Canada
Suite 101- 221 Broadview Avenue
Toronto, ON M4M 2G3

Date: July 4, 2022.

Dear Chair and Members.

RE: EC31.5 – Updates to Chapter 349, Animals (Ward All)

Thank you for the opportunity to discuss the updates to Chapter 349, Animals.

I want to thank City Council and Toronto Animal Services (TAS) staff for implementing progressive animal care programmes that have become the envy of many communities in Ontario and beyond. These include the formation of the Toronto Feral Cat Coalition, spay/neuter and microchipping outreach through the Sny and Chip trucks and increased cat adoption through collaboration with rescue groups.

The majority of the Animal Alliance (AAC) submission will focus on *Seizure and Impounding of Cats: Animals at Large*, with brief comments on several other issues. The City of Toronto is proposing changes to Chapter 389, Animals, that will align it with the City's operational approach of not impounding healthy, owned cats who are allowed outdoors. This has set off a heated discussion regarding free roaming outdoor cats.

The City is concerned that healthy "owned" cats will be brought to the city's shelters where the majority will not be claimed. Less than 10% of the cats admitted to TAS between 2016 and 2021 were claimed by their

221 Broadview Ave.
Suite 101, Toronto
Ontario, Canada
M4M 2G3

Phone
416.462.9541

Fax

416.462.9647

E-mail

Contact@AnimalAlliance.ca

Website

www.AnimalAlliance.ca



owners. This presents an enormous challenge for TAS as it has worked very hard to reduce the number of cats euthanized each year. Cats, particularly those in shelters, are a challenge to adopt out. The City has established relationships with rescue groups who may or may not be able to respond to an increase in numbers. The last thing residents would want to do is to go back to euthanizing cats due to lack of space. Ill and injured cats must be given priority admission.

AAC is concerned that TAS will be seen as the “bad guy” by cat owners and rescue groups because of increased euthanasia rates and by wildlife folks who want cats kept indoors to protect birds and mammals. It has literally taken rescue groups, feral colony caretakers, animal protection advocates and TAS staff a decade or more to build sufficient trust for all the groups to work together toward a common cause - a comprehensive animal care programme in the City. The Toronto Feral Cat Coalition was an important and significant programme that resulted from that collaboration and continues to be a critical part of reducing the outdoor cat population.

Animal Alliance agrees that cats should be kept indoors for their own safety and for the safety of wildlife. The City also recommends that “owned” cats be kept indoors or contained when outside. However, very few communities have invested as much time and energy in humanely reducing feral cat populations as has Toronto. In addition, those municipalities with anti-roaming by-laws provide little or no evidence as to whether the by-laws work and virtually no statistics on the number of impounded cats euthanized. In the end it is the cat, not the owner, who pays the penalty for roaming free as most cats do not carry any identification. Of course, birds and other wildlife also pay the price, an equally important consideration.

Those of us who have been in the animal protection business for a long time remember that dogs used to be the problem. They ran at large in the City, and those people who worked as animal control officers spent much of their time chasing and impounding them. That situation has almost disappeared in many communities across Canada due to a combination of education, advocacy, and by-law enforcement. It is extremely rare to see a dog running at large in the City. But it took considerable time (several decades), collaboration, energy, and education to change the situation. AAC would like to see a similar outcome for cats, so both cats and wildlife are protected.

We need to build a collaborative community around this issue instead of polarizing the debate. The feral cat issue used to cause enormous conflict in the City. The work by TAS and those in the community resulted in a programme dedicated to reducing the feral cat population. If we can develop a successful approach to feral cats, maybe we can do the same to resolve the concerns about outdoor cats and their impact on wildlife. We need something that works.

Recommendations – Impounding of Cats:

Animal Alliance recommends that members of the Committee and Council consider the following:

1. Build on the current education programme to stress the importance of keeping cats indoors, recognizing that it will take time to change public opinion;
2. Remove such negative language as the word “nuisance” from the bylaw;
3. Consider an education programme addressing concerns related to feeding small birds which sometimes causes conflicts in communities. The presence of bird food and the birds may act as an attractant for various animals such as mice, rats, squirrels and raccoons and their respective predators such as fox and coyotes.

Recommendation – Feeding of Wildlife:

Animal Alliance recommends that members of the Committee and Council consider:

Amending Section B (i) to read: *An officer, licensed Trapper, authorized wildlife rehabilitator or employee of a licensed pest management operator or exterminator leaving food as bait to catch wildlife as part of their profession **except where the food contains poison designed to kill wildlife.***

Animal Alliance proposes this amendment to exclude the use of Avitrol to poison pigeons. Avitrol, though legal in Canada, has been banned in a number of municipalities, such as Halifax, Nova Scotia where use is banned on Municipal property, and London, Ontario, due to potential risk to non-target species. It is also banned in New York and other major cities outside of Canada. There is now Ovo-Control, a non-lethal birth control approach to pigeons which is also approved for use in Canada.

Recommendation – Pet Rabbits and Guinea Pigs – Other Animals – Positive Listing:

Animal Alliance recommends that the Committee consider a ban on the sale of all animals through pet stores. We believe that a positive listing would provide clarity on what animals could be “owned” and would provide clarity for those enforcing the by-laws.

Rabbits, rats, mice, guinea pigs and other small animals that end up at TAS are difficult to adopt out and many rescue groups who handle these animals are often overwhelmed by the sheer numbers. If these small animals become sick or injured, many people will not invest in their veterinary care because of the cost and will likely not have them spayed or neutered. In addition, most people do not know how to care for the other species sold at pet stores. Birds, reptiles, amphibians and fish present a challenge to TAS staff who may not know how to care for all species.

Pet birds who are lost also present an additional challenge to shelters due to the concern about bird flu. The Ontario Shelter Medicine Association cites the Order from the Ontario Ministry of Agriculture Food and Rural Affairs (OMAFRA) as follows:

OMAFRA Order – Important for Shelters: With respect to shelters, this means that incoming birds will have to stay in the shelter and be quarantined for 30 days while being kept separate from other birds. If birds are coming to us from homes and have no history of being outdoors or exposed to a backyard flock or wild birds, they could then be rehomed to a home with no other birds. For any stray hens that we receive, unfortunately we may not be able to place them due to HPAI and any orders in place.

If at all possible, healthy indoor birds should not come into shelters at all but should go directly to foster homes, with no other birds and no outdoor exposure. If they do need to come in, they should be kept away from other birds until a foster home can be found.

Conclusion:

Animal Alliance urges Members of the Committee to support the recommended changes as set out in the above recommendations.

Sincerely,



Liz White, Director