



**ANIMAL  
ALLIANCE**  
OF CANADA

*Animal  
Protection  
Through  
Education &  
Advocacy*

April 25, 2023

Chair and Members,  
Economic and Community Development Committee  
10<sup>th</sup> Floor, West Tower, City Hall,  
100 Queen Street West,  
Toronto, ON M5H 2N2  
Email: [ecdc@toronto.ca](mailto:ecdc@toronto.ca)

c.c. Nancy Martins

Dear Chair and Committee Members,

**Re: EC3.4 - Follow Up Report on the UrbanHensTO Backyard Hens Pilot Program**

Thank you for the opportunity to comment on the recommendations from the Executive Director, Municipal Licensing and Standards regarding the UrbanHensTO Backyard Hens Pilot Programme.

**Recommendations:**

Animal Alliance of Canada recommends that Chair and Members of the Economic and Community Development Committee support the recommendation to phase out or “pause indefinitely” the UrbanHensTO programme for the following reasons:

- a. the ongoing presence of the highly pathogenic avian influenza (HPAI) in Ontario, including in backyard flocks and the risk it presents in disease spread and further evolution of the virus;
- b. the limited number of veterinarians in the City able to respond to any chickens who are sick or injured or have HPAI should there be an outbreak;
- c. additional financial costs for the City to run the programme, particularly as it relates to surveillance and containment of HPAI with the City facing a significant financial shortfall; and

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- d. euthanasia by Toronto Animal Services (TAS) staff because of orders from the Canadian Food Inspection Agency (CFIA) and the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) who work to contain the spread of avian influenza.

### **Financial Impact – Increased Costs to the City Despite City Budget Shortfall:**

This year City Council approved an operating budget with an identified shortfall of \$1.56 billion and no assistance to date from the provincial or federal governments.

### **Avian Influenza Affects Backyard Chickens:**

- Between March 2022 and March 2023, there were 46 infected chicken operations in Ontario, of which 31 were commercial and 15 non-commercial.
- The CFIA map (Appendix A) shows that many of these outbreaks were within easy driving distance of Toronto. As chicken and coop rentals increase with the increased demand in Toronto, more animals will be transported from various Ontario locations into Toronto and back out at the end of the rental period, increasing the risk of disease transmission.
- The “Rent a Chicken” programme involves the movement of birds into the City and back to the farm which increases the risk of transferring avian influenza from one part of Ontario to another. According to one chicken rental operation:

Some customers purchase the package but can't keep the hens over winter so we attach a band to one of their legs identifying them. They overwinter with us and are returned the following year and so on after. The rental is returned to our farm where the hens stay for the winter and are rented out again the following year. We keep our hens for at least 3 years at which point egg production drops significantly and they are sold for soup hens. Please keep in mind that we are a farm business and not a sanctuary, most of our livestock become food for human consumption at some point. NONE of our chickens or any livestock end up in sanctuaries! If we end up with too many Hens, they are sold as replacements or new flocks for hobby farmers or backyard chicken enthusiasts.

<https://timberwindfarms.ca/chicken-rentals>

- Some chicken rental operations are also commercial operators, risking cross-contamination.

- Outbreaks of Avian Influenza are infecting other species.

On July 7, 2022, the CFIA reported detections of HPAI in mammals to the World Organisation for Animal Health (WOAH); detections in several wild mammal species have continued intermittently throughout the outbreak. Initial detections were discovered in foxes in Ontario, Quebec and British Columbia, and seals, dolphins and black bears in Quebec. Detections have also been discovered in wild mink, raccoons, porpoises and skunks from several areas across Canada.

<https://www.canada.ca/en/food-inspection-agency/news/2023/04/domestic-dog-tests-positive-for-avian-influenza-in-canada.html>

- 757,000 birds have been culled in Ontario in that time period (Appendix B). CFIA culling methods are not openly discussed but immediate mass killing is considered imperative to stop the spread of avian influenza and involves the use of carbon dioxide if the barn can be sealed, covering and suffocating the birds with foam, and in the US and possibly in Canada, shutting down the ventilation systems in the barns. An April 7, 2022 CBS titled, "Bird Flu's grisly question: How to kill millions of poultry" reported the following:

Farms faced with the need to kill so many birds turn to recommendations by the American Veterinary Medical Association. Even as it has developed methods to kill the poultry quickly, the association acknowledges its techniques "may not guarantee that the deaths the animals face are painless and distress free." Veterinarians and U.S. Department of Agriculture officials also typically oversee the process. One of the preferred methods is to spray water-based firefighting foam over birds as they roam around the ground inside a barn. That foam kills the animals by cutting off their air supply. When foam won't work because birds are in cages above the ground or it's too cold, the USDA recommends sealing up barns and piping carbon dioxide inside, first rendering the birds unconscious and ultimately killing them. If one [of] those methods won't work because equipment or workers aren't available, or when the size of a flock is too large, the association said a last resort is a technique called ventilation shutdown. In that scenario, farmers stop airflow into barns, which raises temperatures to levels at which the animals die. The USDA and the veterinary association

recommend that farmers add additional heat or carbon dioxide to barns to speed up the process and limit suffering by the animals.

<https://www.cbsnews.com/news/bird-flu-kill-millions-of-poultry/>

### **Why Risk Avian Influenza:**

In April 2004, the World Health Organization (WHO) confirmed the presence of avian flu in Canada. According to an article published in the National Centre for Biotechnology Information, titled, “*WHO confirms avian flu infections in Canada*”, author Barbara Kermode-Scott writes:

“Canada has ordered the slaughter of about 19 million birds, including chickens, turkeys, ducks, geese, and pigeons, at 20 poultry farms in an effort to eradicate an outbreak of bird influenza. The World Health Organization has confirmed that there have been two human cases of avian influenza A (H7) in British Columbia, Canada. Both cases were mild.

On the basis of epidemiological information provided by Health Canada, WHO has raised the global pandemic preparedness level for the Canadian outbreak from 0.1 to 0.2—the same level as the global preparedness level for the avian flu outbreak in Asia. In Asia, the highly pathogenic avian flu virus strain A (H5N1), has been responsible for 34 reported illnesses in humans and 23 deaths.”

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC390237/>

An article in the New York Times dated February 24, 2022, titled “*Avian Flu Spread in the U.S. Worries Poultry Industry*” author Andrew Jacobs writes:

“Although the danger to humans is low, scientists are keeping a close eye on the virus, the Eurasian H5N1, which is closely related to an Asian strain that has infected hundreds of people since 2003, mostly those who had worked with infected poultry. That virus does not spread efficiently among humans but it is extremely deadly, with a fatality rate of 60%, according to the Centres for Disease Control and Prevention. The strain currently spreading across the United States has not jumped to humans, but virologists and epidemiologists say the mounting infections among birds is worrisome because it increases the possibility that the virus could mutate in way[s] that makes it more infectious to people.”

<https://www.nytimes.com/2022/02/24/science/avian-flu-us-poultry.html>

In a more recent article, March 25, 2023 and updated on April 6, 2023, author Kate Dangerfield of Global News writes:

Bird flu, or avian flu, continues to spread across Canada, leaving some experts worried about its potential to become more transmissible among humans, and potentially sparking another pandemic.

This strain of bird flu first showed up in Canada in December 2021. Since then, Sharif said it has gone through "three waves." The first was at the beginning of March 2022, the second around August last year and he said Canada is currently in the third wave, adding "we aren't in the height of the wave, but only the very beginning."

<https://globalnews.ca/news/9575793/bird-flu-pandemic-potential-canada/>

### **Consequence for the birds both commercial and backyard:**

The main approach to bird flu containment is mass extermination of captive flocks where the virus has been detected.

- January and February 2004, 50 - 80 million birds were exterminated in Asia.
- February of 2004, the US state of Delaware killed 89,000 chickens at just two farms in an attempt to control avian influenza.
- March of 2004, 118,000 chickens were exterminated on a single farm on a single day in Maryland.
- In 2004, in Vietnam and Thailand more than 100 million birds were slaughtered, while on the Eastern Cape of South Africa, 27,000 ostriches were destroyed.
- In 2022, the USDA confirms highly pathogenic avian influenza in commercial and backyard flocks, where 22 of the 50 infected locations identified were backyard flocks.
- As of April 19, 2023, Canada killed 7,596,000 million domestic birds in Canada to control the disease.

## **Consequences for backyard chickens in Toronto:**

Should Council decide to allow Toronto residents to have backyard chickens, it should do so with the knowledge that abandoned or surrendered birds in the possession of Toronto Animal Services may no longer be allowed to be placed outside of Toronto in order to reduce the possibility of transmission of disease from one jurisdiction to another. This forces City staff, who work hard to find new homes for the animals in the shelter, to euthanize the birds even though they are healthy.

Council should also consider prohibiting the “rent-a-chicken” concept. The birds and coops are provided and when the birds are no longer wanted, they are removed by the supply company. Again, this means moving birds from one community to another with the chance of bringing infected birds in Toronto or spreading the infection outside Toronto when the birds are removed.

Thank you for considering our comments.

Sincerely,



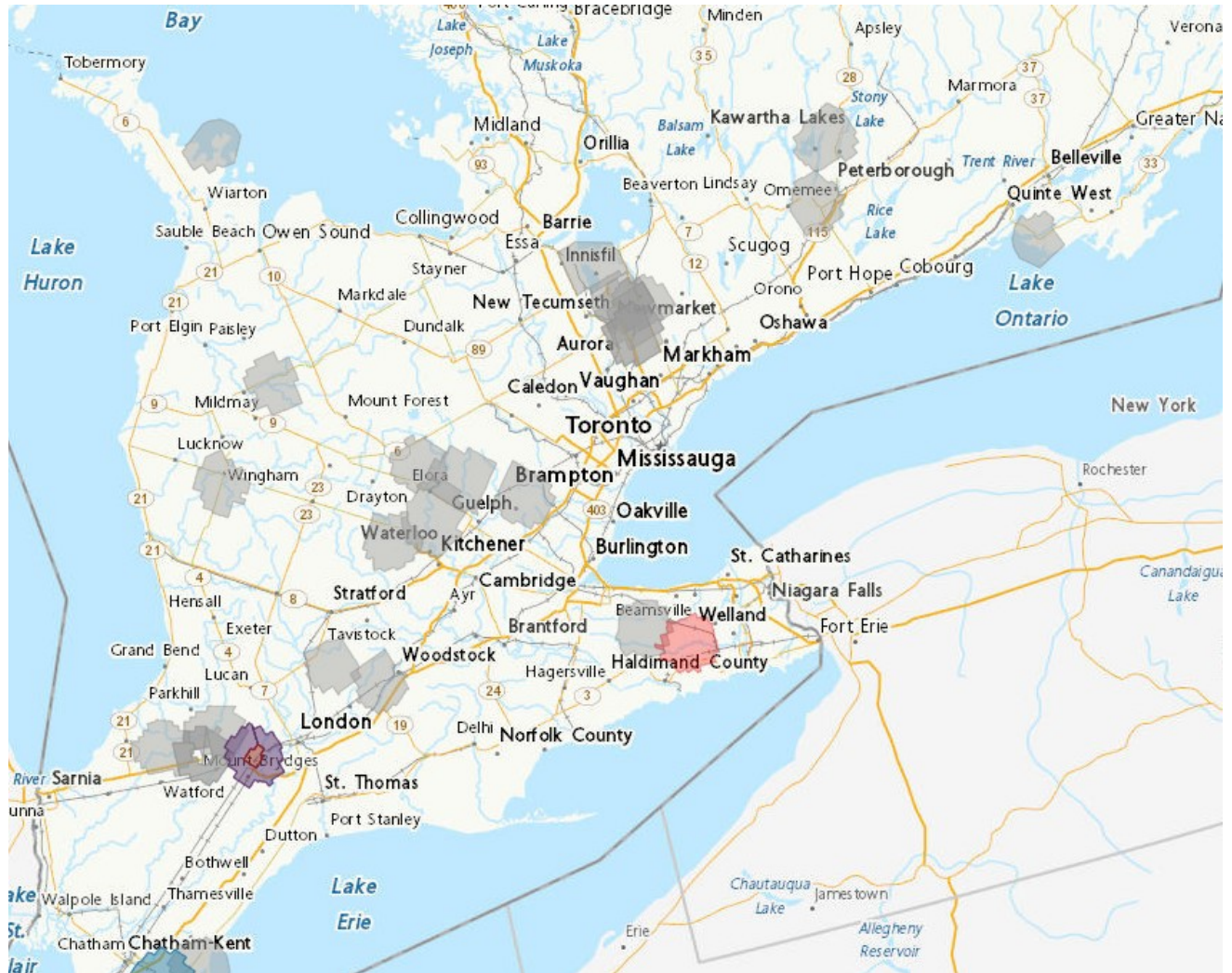
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## Appendix A

<https://inspection.canada.ca/animal-health/terrestrial-animals/diseases/reportable/avian-influenza/hpai-in-canada/status-of-ongoing-avian-influenza-response/ai-zones/eng/1648851134912/1648851359195>

Location of avian influenza outbreaks in Ontario from March 2022 to March 2023



## Appendix B

### Number of birds killed in Ontario due to HPAI in Ontario

Province	Number of infected premises (current IPs)	Number of previously infected premises (released IPs)	Estimated number of birds impacted (as of 2023-04-04)
Ontario	6	39	757,000



Appendix C

(NOTE: Lines highlighted in yellow are the non-commercial poultry operations)

Date detected	Infected Premises (IP) location <a href="#">Question</a>		WOAH premises classification <a href="#">Question</a>	Primary control zone (PCZ) <a href="#">Question</a> - Map	Status of order declaring PCZ
April 5, 2023	ON-IP46 Municipality of Middlesex Centre	commercial	poultry	<a href="#">PCZ-181</a>	<a href="#">Active</a>
March 14, 2023	ON-IP45 Township of West Lincoln	commercial	poultry	<a href="#">PCZ-177</a>	<a href="#">Active</a>
March 10, 2023	ON-IP44 Municipality of Chatham-Kent	non-commercial	poultry	<a href="#">PCZ-176</a>	<a href="#">Active</a>
December 21, 2022	ON-IP43 Municipality of Lambton Shores	commercial	poultry	<a href="#">PCZ-167</a>	<a href="#">Revoked</a>
December 17, 2022	ON-IP42 Municipality of Lambton Shores	commercial	poultry	<a href="#">PCZ-167</a>	<a href="#">Revoked</a>
December 13, 2022	ON-IP41 Municipality of Lambton Shores	commercial	poultry	<a href="#">PCZ-167</a>	<a href="#">Revoked</a>
November 27, 2022	ON-IP40 Municipality of North Middlesex	commercial	poultry	<a href="#">PCZ-160</a>	<a href="#">Revoked</a>
November 21, 2022	ON-IP39 Municipality of Adelaide Metcalfe	commercial	poultry	<a href="#">PCZ-154</a>	<a href="#">Revoked</a>
November 18, 2022	ON-IP38 Municipality of Adelaide Metcalfe	commercial	poultry	<a href="#">PCZ-150</a>	<a href="#">Revoked</a>
October 26, 2022	ON-IP37 City of Ottawa	non-commercial	poultry	<a href="#">PCZ-138</a>	<a href="#">Revoked</a>

Date detected	Infected Premises (IP) location <a href="#">Question</a>		WOAH premises classification <a href="#">Question</a>	Primary control zone (PCZ) <a href="#">Question</a> - Map	Status of order declaring PCZ
October 18, 2022	ON-IP36 Township of Wellesley	commercial	poultry	<a href="#">PCZ-130</a>	<a href="#">Revoked</a>
October 10, 2022	ON-IP35 Township of Alfred and Plantagenet	non-commercial	poultry	<a href="#">PCZ-124</a>	<a href="#">Revoked</a>
October 10, 2022	ON-IP34 Township of East Hawkesbury	non-commercial	poultry	<a href="#">PCZ-123</a>	<a href="#">Revoked</a>
October 8, 2022	ON-IP33 Township of Alfred and Plantagenet	non-commercial	poultry	<a href="#">PCZ-122</a>	<a href="#">Revoked</a>
October 6, 2022	ON-IP32 Township of West Lincoln	non-commercial	non-poultry	<a href="#">PCZ-116</a>	<a href="#">Revoked</a> <a href="#">Table</a> <a href="#">Note 1</a>
September 29, 2022	ON-IP31 City of Clarence-Rockland	commercial	poultry	<a href="#">PCZ-109</a>	<a href="#">Revoked</a>
September 21, 2022	ON-IP30 Township of Grimsby	non-commercial	non-poultry	N/A	N/A
September 20, 2022	ON-IP29 Brant County	non-commercial	non-poultry	N/A	N/A
September 19, 2022	ON-IP28 City of Owen Sound	non-commercial	non-poultry	N/A	N/A
September 17, 2022	ON-IP27 Township of Zorra	commercial	poultry	<a href="#">PCZ-91</a>	<a href="#">Revoked</a>
May 18, 2022	ON-IP26 Regional Municipality of York	commercial	poultry	<a href="#">PCZ-65</a>	<a href="#">Revoked</a>
May 10, 2022	ON-IP25 Regional Municipality of York	commercial	poultry	<a href="#">PCZ-45</a>	<a href="#">Revoked</a>
May 6, 2022	ON-IP24	commercial	poultry	<a href="#">PCZ-58</a>	<a href="#">Revoked</a>

Date detected	Infected Premises (IP) location <a href="#">Question</a>		WOAH premises classification <a href="#">Question</a>	Primary control zone (PCZ) <a href="#">Question</a> - Map	Status of order declaring PCZ
	Regional Municipality of York				
May 4, 2022	ON-IP23 Regional Municipality of York	commercial	poultry	<a href="#">PCZ-55</a>	<a href="#">Revoked</a>
May 4, 2022	ON-IP22 Regional Municipality of Halton	non-commercial	poultry	<a href="#">PCZ-52</a>	<a href="#">Revoked</a>
May 5, 2022	ON-IP21 Wellington County	non-commercial	poultry	<a href="#">PCZ-51</a>	<a href="#">Revoked</a>
April 29, 2022	ON-IP20 Regional Municipality of York	commercial	poultry	<a href="#">PCZ-45</a>	<a href="#">Revoked</a>
April 26, 2022	ON-IP19 Huron County	commercial	poultry	<a href="#">PCZ-41</a>	<a href="#">Revoked</a>
April 23, 2022	ON-IP18 Peterborough County	non-commercial	non-poultry	<a href="#">PCZ-38</a>	<a href="#">Revoked</a>
April 21, 2022	ON-IP17 Regional Municipality of York	commercial	poultry	<a href="#">PCZ-33</a>	<a href="#">Revoked</a>
April 14, 2022	ON-IP16 Township of South Glengarry	commercial	poultry	<a href="#">PCZ-22</a>	<a href="#">Revoked</a>
April 14, 2022	ON-IP15 City of Markham	commercial	poultry	<a href="#">PCZ-06</a> and <a href="#">PCZ-09</a>	<a href="#">Revoked</a> <a href="#">Revoked</a>
April 12, 2022	ON-IP14 City of Markham	commercial	poultry	<a href="#">PCZ-06</a> and <a href="#">PCZ-09</a>	<a href="#">Revoked</a> <a href="#">Revoked</a>
April 9, 2022	ON-IP13 Township of West Grey	commercial	poultry	<a href="#">PCZ-12</a>	<a href="#">Revoked</a>
April 12, 2022	ON-IP12 Township of South Glengarry	commercial	poultry	<a href="#">PCZ-10</a>	<a href="#">Revoked</a>

Date detected	Infected Premises (IP) location <a href="#">Question</a>		WOAH premises classification <a href="#">Question</a>	Primary control zone (PCZ) <a href="#">Question</a> - Map	Status of order declaring PCZ
April 6, 2022	ON-IP11 City of Markham	commercial	poultry	<a href="#">PCZ-06</a> and <a href="#">PCZ-09</a>	<a href="#">Revoked</a> <a href="#">Revoked</a>
April 6, 2022	ON-IP10 Municipality of Chatham-Kent	commercial	poultry	<a href="#">PCZ-08</a>	<a href="#">Revoked</a>
April 5, 2022	ON-IP09 Prince Edward County	non-commercial	poultry	<a href="#">PCZ-07</a>	<a href="#">Revoked</a>
April 5, 2022	ON-IP08 City of Markham	commercial	poultry	<a href="#">PCZ-06</a> and <a href="#">PCZ-09</a>	<a href="#">Revoked</a> <a href="#">Revoked</a>
April 10, 2022	ON-IP07 Township of South Glengarry	commercial	poultry	<a href="#">PCZ-10</a>	<a href="#">Revoked</a>
April 4, 2022	ON-IP06 Township of Centre Wellington	commercial	poultry	<a href="#">PCZ-05</a>	<a href="#">Revoked</a>
April 2, 2022	ON-IP05 Township of Selwyn	non-commercial	poultry	<a href="#">PCZ-04</a>	<a href="#">Revoked</a>
March 31, 2022	ON-IP04 Township of Chippewas of Nawash Unceded First Nation	non-commercial	poultry	<a href="#">PCZ-03</a>	<a href="#">Revoked</a>
March 30, 2022	ON-IP03 Township of Woolwich	commercial	poultry	<a href="#">PCZ-01</a>	<a href="#">Revoked</a>
March 28, 2022	ON-IP02 Township of Zorra	commercial	poultry	<a href="#">PCZ-02</a>	<a href="#">Revoked</a>
March 27, 2022	ON-IP01 Township of Guelph/Eramosa	commercial	poultry	<a href="#">PCZ-01</a>	<a href="#">Revoked</a>