

Supplemental Report: Enforcement Approach for Off-Leash Areas and Parks

Date: April 22, 2025

To: City Council

From: Executive Director, Municipal Licensing and Standards

Wards: All

SUMMARY

This supplemental report responds to discussions during [2025.IE20.9](#) to provide greater clarity and detail on the compliance and enforcement approach and strategies related to Dog Off-Leash Areas (OLAs) in Toronto.

As identified in the staff report and Attachment 1 (Toronto's Dog Off-Leash Strategy) for Item [2025.IE20.9](#) - to support responsible dog ownership at OLAs and parks, the Parks and Recreation Division (P&R) and the Municipal Licensing and Standards Division (MLS) use a combination of communication, education, and enforcement to obtain compliance. MLS employs a data-driven approach to enforce off-leash and park use regulations. Issues are addressed through responding to complaints and through proactive patrols of priority areas that have a high number of complaints. MLS' experience is that there are few issues and/or violations related to the use of OLAs themselves, and that the majority of concerns relate to dog owners allowing their dog off-leash in a park or greenspace and not in a designated OLA.

Residents can report off-leash dog incidents by calling 311 and/or submitting information online, with details such as the location, time, and number of dogs involved. This data helps the City identify problem areas, including on school properties, and educate dog owners on bylaw compliance. Bylaw enforcement officers monitor parks and public spaces, responding to complaints and issuing fines for violations.

Toronto's Dog Off-Leash Strategy will facilitate bylaw compliance by expanding the OLA network to densely populated areas without an OLA. Increasing access to well-designed and maintained OLAs both current and future, facilitates use of designated space for off-leash activity.

This report also provides information on the cost of additional resources to respond to service requests related to OLAs. Staff do not recommend increasing MLS' resource complement at this time to respond to off-leash complaints.

RECOMMENDATIONS

The Executive Director, Municipal Licensing and Standards recommends that:

1. City Council receive this report for information.

FINANCIAL IMPACT

There are no financial impacts resulting from this report.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in the Financial Impact section.

DECISION HISTORY

On April 9, 2025, the Infrastructure and Environment Committee adopted Item 2025.IE20.9 - Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas. The report from the Parks & Recreation Division proposes an updated citywide Toronto Dog Off-Leash Strategy to guide planning, locating, designing, building, maintaining, and upgrading off-leash areas, as well as promoting responsible dog ownership through education and enforcement and engaging residents including off-leash area users.

<https://secure.toronto.ca/council/agenda-item.do?item=2025.IE20.9>.

On April 8, 2025, the Economic and Community Development Committee adopted Item 2025.EC19.5 - Addressing Dangerous Dogs - Response to 2024.EC16.3, with amendments. The report includes information on the number of children bitten by dogs, dangerous dog signage in condos, information on the dangerous dog map, and the quantification of severity of dangerous acts by dogs.

<https://secure.toronto.ca/council/agenda-item.do?item=2025.EC19.5>.

On November 14, 2024, City Council adopted Item 2024. EC16.3 - Update on Actions to Address Dangerous Dogs, with amendments. The report summarized actions taken by Toronto Animal Services to address dangerous dogs in Toronto.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.EC16.3>

On May 29, 2024, the Economic and Community Development Committee adopted Item 2024.EC13.1 - Dangerous Dog Review Tribunal 2023 Annual Report, with amendments. The Committee received the Tribunal Chair's 2023 Annual Report, and requested MLS, in consultation with the City Solicitor, report back in the fourth quarter of 2024 on the definition of severity of a dangerous act.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.EC13.1>

On March 20, 2024, City Council adopted Item 2024.EC10.2 - Response to EC6.9 - Incident and Operational Review of Serious Dog Attacks, with amendments. The report summarized operational reviews of a specific dangerous dog attack undertaken by MLS and Toronto Public Health, as well as actions identified to improve processes and

enhance public safety, including establishing a public dangerous dog registry and creating a new standard format dangerous dog warning sign.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.EC10.2>

On October 11 and 12, 2023, City Council directed the General Manager, Parks and Recreation, to review and update the City's approach to planning, locating, funding, building, and maintaining Dogs Off-Leash and together with the Executive Director, Municipal Licensing and Standards, to ensure the approach to Dogs Off-Leash Areas includes bylaw enforcement strategies to address the ongoing concerns of all park users.

<https://secure.toronto.ca/council/agenda-item.do?item=2023.IE6.8>

COMMENTS

By-law Enforcement Officers (BEOs) and Animal Control Officers (ACOs) in the Municipal Licensing and Standards (MLS) Division are responsible for enforcing the Parks and Animals Bylaws and ensuring compliance with dogs off-leash in parks, appropriate use of Off-Leash Areas (OLAs), and other issues related to park use and animals more broadly.

Relevant Regulations

Dog owners/walkers and or commercial dog walkers are legally responsible for their own dog(s) and any injuries or damage caused by their dog(s). Several bylaws are in place to support the safe and enjoyable use of the City's parks by all who use them.

Toronto Municipal Code [Chapter 608, Parks](#) (Parks By-law) requires that:

- Dogs be on a leash at all times while in a park or a beach, except in designated areas, and dog owners must immediately pick up dog waste
- Dog owners only permit their dogs to be off leash in designated OLAs and abide by posted conditions of use of the OLA (including hours of use and/or prohibition on commercial dog walkers)
- The following are not allowed in OLAs:
 - Female dogs in heat
 - Any dog that has been issued a Dangerous Dog Order by the City or is required to be muzzled or secured by a leash under the Dog Owner's Liability Act
- Commercial Dog Walkers must be authorized by permit by the Parks and Recreation Division and are allowed to walk and have control of 4 to 6 dogs at a time and shall not enter a designated off-leash area that prohibits Commercial Dog Walkers

Staff in MLS' Bylaw Enforcement Team enforce all rules outlined in the Parks By-law, including those related to OLAs. MLS' experience is that there are few issues and/or violations related to the use of OLAs themselves, and that the majority of concerns are related to dog owners that choose to allow their dog off-leash in a park or greenspace and not in a designated OLA.

For example, service requests for other OLA-related offences (prohibited use of an OLA by a commercial dog walker or a female dog in heat in an OLA) are infrequent – there were 97 service requests for MLS registered in 2024 for commercial dog walkers City-wide (73 of these requests were registered as a result of proactive visits to parks).

Table 1 and Table 2 below outline service requests and charges for dogs off-leash in parks enforced under the Parks Bylaw. The number of proactive patrols has increased in recent years (35% increase in 2024 compared to 2023). Dogs off-leash and general park use are consistently the two highest service request categories for parks enforcement.

In addition, Toronto Municipal Code [Chapter 349, Animals](#) (Animals By-law) requires that:

- Dogs must always be kept on a leash when off the property of their owner (except in designated OLAs) and under the control of their owner (a person in possession or custody of the dog)
- Every owner must take reasonable precautions to prevent their dog from engaging in a dangerous act (any bite, attack, act of menacing behaviour or any combination thereof)
- All dogs living in the city must be licensed

Staff in MLS' Toronto Animal Services enforcement teams respond to service requests related to dogs at-large (outside of parks), collaborate with Toronto District School Board (TDSB) and/or Toronto Catholic District School Board (TCDSB) on responding to dogs off-leash issues on school properties, and investigate any reported dangerous act by a dog.

Once TAS receives information about a dog that has committed a dangerous act, ACOs will investigate the incident, interview the victim, dog owner, and any witnesses, ask the victim and any witness to prepare a statement, ask for medical documentation (if applicable), take photos, collect any evidence, and determine if a Dangerous Dog Order (DDO) should be issued in accordance with the Animals Bylaw. TAS triages all reports of dangerous dog acts and prioritizes requests involving severe incidents (e.g., multiple bite wounds or other serious injuries to a person or animal).

TAS staff may also be included in proactive visits to priority parks that have various bylaw compliance issues.

Table 1: Service Requests for Dogs Off-Leash in Parks (2019 – Q1 2025)

	2019	2020	2021	2022	2023	Q1 2023	2024	Q1 2024	Q1 2025
Complaints	1,258	1,430	2,263	2,245	2,397	529	2,675	636	394
Proactive Patrols	5,055	2,868	1,354	3,615	3,790	1,135	5,132	1,096	3,264

	2019	2020	2021	2022	2023	Q1 2023	2024	Q1 2024	Q1 2025
Total	6,313	4,298	3,617	5,860	6,187	1,664	7,807	1,732	3,658

Table 2: Charges (i.e. Tickets) for Dogs Off-Leash in Parks (2019 – Q1 2025)

	2019	2020	2021	2022	2023	Q1 2023	2024	Q1 2024	Q1 2025
Off leash – parks (Ch.608)	93	73	26	8	10	3	47	11	59

Note: Provincial limitations and enforcement of emergency COVID-related orders had an impact on bylaw enforcement throughout 2020 and 2021

Compliance and Enforcement Strategy

As identified in the staff report and Attachment 1 (Toronto’s Dog Off-Leash Strategy) for Item [2025.IE20.9](#) - to support responsible dog ownership at OLAs and parks, P&R and MLS use a combination of communication, education, and enforcement to ensure compliance.

Communication

Both P&R and MLS have webpages and conduct public education campaigns related to responsible dog ownership. For example, Strategic Public and Employee Communications (SPEC) and MLS staff are planning a robust campaign on leashing dogs in spring 2025, with a budget of \$350,000 that was approved through the 2025 budget process.

The updated campaign will build on messaging used in the 2024 campaign and further the reach of the campaign by employing tactics that proved most successful. The campaign’s messaging will stress the urgency of keeping dogs on leashes and inform dog owners that most dangerous acts can be prevented if dogs are leashed and under the control of their owner. The 2024 campaign was well-received with high engagement rates across tactics, including approximately 25,000 webpage views and 1.4 million social media ad and post views.

Education

P&R ensures parks have proper signage and information and as identified in the Dog Off-Leash Strategy, P&R will be updating signage across all OLAs to more clearly communicate OLA guidelines and relevant Bylaws, including proper disposal of dog waste, to support compliance. BEOs conduct routine patrols to educate park users where violations are identified, to obtain compliance. BEOs educate dog owners about

bylaw requirements, such as the importance of keeping dogs on a leash, to prevent dangerous acts. MLS has recently updated its education materials and provides fliers to residents when patrolling priority parks.

Enforcement

Residents can report off-leash dog incidents by calling 311 and/or submitting information online, with details such as the location, time, and number of dogs involved.

MLS Bylaw Enforcement Officers (BEOs) address complaints using a risk-based response analysis and conduct visits on a proactive and reactive basis. BEOs take escalated enforcement action when appropriate, including laying charges. Enforcement staff have the ability to issue initial fines for violations – for example, there is a \$500 set fine for off-leash violations (plus a victim surcharge and administration fee per the Provincial Offences Act).

MLS is not resourced on an emergency basis (that is, BEOs are not immediately dispatched to address a complaint and are not emergency responders). In addition, it is ineffective to dispatch a BEO to address a complaint about an off-leash dog days after the complaint is made. BEOs use information from the complainant (such as pattern of violations, identifiers and place and time) where possible to decide on a specified response.

Staff undertake frequent proactive enforcement patrols in priority parks for issues related to dogs off-leash, illegal dumping, fireworks, failure to remove dog excrement, graffiti at a park, and posterage (where there are persistent and problematic issues with bylaw compliance). Staff visit all other parks at least monthly. The volume of patrols is identified in Table 1 above. To identify priority parks, staff analyze service request data, P&R identification of problematic parks, and data analytics (heat maps), to deploy staff to parks where issues are most prevalent.

During patrols, BEOs assess all aspects of the Parks Bylaw for compliance. In some instances, there are challenges obtaining identification and unwillingness of dog owners to comply with bylaws. MLS may partner with the Toronto Police Service and/or Provincial Conservation Officers with the Toronto Region Conservation Authority (TRCA) during patrols to address issues where additional support will better facilitate compliance (for example, to obtain identification when needed or to address safety concerns or interactions with wildlife in Environmentally Significant Areas). Collaboration with TPS, in particular, has enhanced MLS' ability to address higher risk issues by utilizing operational plans which increase enforcement presence during identified times and locations.

For remaining park use issues, MLS uses a priority response model to triage and focus on urgent service requests with health and safety concerns. This model sets service standards within which complainants should expect a first communication, which are available on the [City's webpage](#).

Additional considerations

This compliance and enforcement approach aligns with MLS' framework to enforce other bylaws and statutes. The Division uses varying response strategies and/or investigation methods, based on priority levels and available resources.

Staff propose maintaining this existing approach for off-leash areas and park use, as it strategically uses enforcement data to inform the structure of patrols and to ensure an efficient deployment of resources. MLS will support P&R to ensure the updated approach for Dog Off-Leash Areas, if approved by City Council, is properly communicated and incorporated into MLS' standard operating procedures.

In addition, the proposed Dog Off-Leash Strategy will support bylaw compliance by:

- Increasing local access to well-designed and maintained OLAs both current and future to give owners more options to run their dogs responsibly;
- Simplifying and consolidating OLA rules of conduct (for example, the City will establish and communicate consistent hours of operation for new OLAs); and
- Refreshing and implementing updated OLA signage, website, and public communication.

In addition to the compliance and enforcement strategy, and to support the updated OLA Strategy, MLS will share enforcement and heat mapping with P&R as needed to inform Parks staff where compliance issues are, and where new OLAs may be most beneficial.

Addressing off-leash dogs on school properties

School boards often have rules which do not permit dogs on school properties, and school boards implement and enforce their own dog-related policies on their property. However, recently off-leash dogs on school properties have led to an increase in the number of unwanted interactions and complaints. To help address this issue, MLS worked with 311 in May 2024 to make system updates so that residents can now call 311 or submit information online to report dogs off-leash on school properties. The Animals Bylaw's leashing requirements also apply to school properties.

Toronto Animal Services (TAS) now uses the data collected through 311 to identify the schools where dogs off-leash are particularly challenging and undertakes monthly proactive patrols at the properties with the most complaints. This is done in collaboration with Toronto District School Board (TDSB) and/or Toronto Catholic District School Board (TCDSB) security staff. During patrols, staff educate dog owners about bylaw requirements, and may take enforcement action when appropriate, including laying charges.

Designating Bylaw Enforcement Officers as Special Constables

In the public and stakeholder engagement process, some supported the idea of designating Bylaw Enforcement Officers as special constables. There were suggestions that this authority may enable officers to compel dog owners to produce identification (often a barrier to pursuing enforcement action).

Special Constable status would engage a process administered under provincial law by the province and the Toronto Police Services Board. Under Part VI of the Community Safety and Policing Act, 2019 (CPSA), in order for an individual to be appointed as a special constable, they must work for a special constable employer authorized by the province for a specific purpose and can be appointed by the appropriate police service board provided they meet certain requirements under the CPSA. Once appointed, special constables can exercise certain powers of a police officer as spelled out in their appointment and permitted under the CPSA, with some such powers including, in some cases, certain police powers under the Criminal Code and certain sections of the Controlled Drugs and Substances Act, Trespass to Property Act, Liquor Licence and Control Act and Mental Health Act.

In Toronto, the Toronto Police Services Board has appointed special constables who work for the Toronto Transit Commission and the University of Toronto, among others. Special constables must comply with the requirements of their appointment and the CPSA, which includes a code of conduct and uniform requirements. City staff would need additional time to (i) consider what police powers, if any, would assist enforcement in this area and (ii) to consult with Legal Services and provincial counterparts on the process to obtain special constable employer status and appointments for any impacted staff positions. In addition, staff would need to consider the financial, operational and policy impacts of seeking any such designation to enforce off-leash related bylaws.

Enforcement Resources

MLS' service lines and enforcement teams enforce more than 30 various bylaws and statutes, and the Division has an enforcement complement of approximately 341 staff, some of which work on 5 dedicated enforcement teams (RentSafeTO, Multi-Tenant Houses, Short-Term Rentals, Noise, Vehicle-for-Hire/Adult Services).

BEOs patrol more than 1,500 parks to enforce park use regulations, and not exclusively rules related to dogs-off leash. There are 35 BEOs in MLS' Parks and Open Spaces team across 3 Districts (10 BEOs in the East District, 12 in West, and 13 in Central) and it is not feasible for BEOs to remain stationary to enforce only the rules related to dogs-off leash.

As noted above, MLS deploys staff to areas where the most prevalent and persistent complaints related to dogs-off leash occur to use resources and time effectively. Given the volume of parks in Toronto, adding a few additional staff to the team will not have a notable impact on compliance – it is best to focus on behaviour change and consistent communication and education about the rules and benefits of OLAs, and to ensure that the City is providing enough designated OLAs within walking distance to reduce the number of off-leash violations, which the updated Dog Off-Leash Strategy will enable.

If City Council wishes to add additional resources to MLS' Parks and Open Spaces to enforce off-leash concerns across the existing three districts, it could consider the following options (annualized impacts):

1. The cost to add 6 BEOs, 2 in each district, is approximately \$880,000 (\$116,000 per BEO plus vehicle costs)

2. The cost to add a fully supervised team of 8 BEOs, a Supervisor and a Support Assistant would be approximately \$1.4M, which could enable a dedicated team that could focus on park use issues and dogs off-leash in problem parks.

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SIGNATURE

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