IE20.9 – Toronto's Dog Off-Leash Strategy – Addressing (April 22, 2025) Supplementary report from the Executive Director, MLS - on Enforcement Approach (IE20.9a), Lenka Holubec, ProtectNatureTO

To:

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Cc: <u>mayor_chow@toronto.ca</u>; <u>carleton.grant@toronto.ca</u>; <u>howie.dayton@toronto.ca</u>; <u>john.danner2@toronto.ca</u>; <u>Councillor_Moise@toronto.ca</u>; <u>councillor_mckelvie@toronto.ca</u>; <u>councillor_colle8@toronto.ca</u>; <u>Councillor_Morley@toronto.ca</u>; <u>Councillor_Saxe@toronto.ca</u>; <u>councillor_perruzza@toronto.ca</u>; <u>councillor_pasternak@toronto.ca</u>; <u>councillor_fletcher@toronto.ca</u>; <u>councillor_ainslie@toronto.ca</u>; <u>Councillor_Kandavel@toronto.ca</u>; <u>Councillor_Malik@toronto.ca</u>; <u>councillor_perks@toronto.ca</u>; <u>councillor_holyday@toronto.ca</u>; <u>Councillor_ChernosLin@toronto.ca</u>; <u>councillor_bradford@toronto.ca</u>; <u>councillor_nunziata@toronto.ca</u> <u>esther.attard@toronto.ca</u>; <u>anna.fernandes@toronto.ca</u>; <u>Sandra.Rodriguez@toronto.ca</u>; <u>joshua.bowman2@toronto.ca</u>; <u>cara.webster@toronto.ca</u>

Dear Mayor Chow, Carleton Grant, the Executive Director of MLS; Howie Dayton, Director of Community Recreation in PF&R; John Danner, Policy Development Officer Parks & Recreation, Toronto City Councillors and all city staff,

This is to:

Request that E20.9 Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas is Referred Back to Staff for more deliberation and refining of terms and criteria

And

Recommend that the City Council considers adopting "additional resources to MLS' Parks and Open Spaces to enforce off-leash concerns across the existing three districts, by following Option 2, as suggested in Supplementary report from the Executive Director, Municipal Licensing and Standards on Enforcement Approach for Off-Leash Areas and Parks (IE20.9a)

"Option 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."

This could partially supplement for much needed Special Constables before that option becomes available.

Following are my comments in respect to (April 22, 2025) Supplementary report from the Executive Director, Municipal Licensing and Standards on Enforcement Approach for Off-Leash Areas and Parks (IE20.9a) <u>https://www.toronto.ca/legdocs/mmis/2025/cc/bgrd/backgroundfile-254827.pdf</u>

This Report supports status quo - "educate first" approach to enforcement when BEO's are basically Peace officers - educating dog owners on dog ownership related laws, giving warnings but seldom tickets.

The concept seems to be utilized in some other cities in Canada and US, despite these cities reporting low compliance with leash laws and some, e.g. Calgary, high non-compliance and related consequences: **"It matters because it's very disruptive to park users and wildlife,"** said Tracy Lee, director of conservation at the Miistakis Institute in Calgary". Calgary has one of the largest combined off-leash spaces in North America, according to the city, with 13 per cent of Calgary's parkland open for dogs to run free. Since 2013, Calgary has used an off-leash ambassador program to promote "responsible pet ownership and safety in off-leash areas. A list of Calgary's 160 public off-leash dog areas is available on the city's website. <u>Calgary dog owners disturbing nature by breaking leash rules, letting pooches run free</u> December 20, 2024

The low priority given to the enforcement of the leash laws may have something to do with a strong human bond with dogs and still prevailing lack of awareness or perhaps denial of our best friends negative effects on environment.

"We are all too aware of the negative effects of cats, both owned and feral, on wildlife. By contrast, our pet dogs often seem to get a free pass. This is, unfortunately, based more on feelings than data. **Our beloved pet dogs have a far greater, more insidious and more concerning effect on wildlife and the environment than we would like to be the case.** In our new research, we lay out the damage pet dogs do and what can be done about it" <u>Good boy or bad dog? Our 1 billion pet dogs do real environmental damage</u>, April 9, 2025

In his Supplementary Report Carleton Grant, the Executive Director of MLS, states:

"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."

Also confirmed by findings of this Strategy - **Attachment 3 - Jurisdictional Review - Off-Leash Areas** <u>https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254204.pdf</u> **the OLAS numbers/availability on its own, do not improve compliance, if not supported by the efficient enforcement** : *"All municipalities interviewed identified by-law compliance as a challenge, with varying degrees of success addressing the issue. The most-cited issues included dogs off-leash outside of designated areas, owners failing to pick up and dispose of dog waste properly, and off-leash dogs not under the owner's control.* **Cities generally noted that a lack of resources for enforcement officers and the overall low-priority of dog-related issues made compliance especially challenging.** The Chart provided in this Report tells the story. In 2019, the number of tickets given was the highest. With fewer tickets each subsequent year, the number of complaints rises.

	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

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

Enforcement Approach for Off-Leash Areas and Parks

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	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

This is supported by below Study:

<u>Responsible Dog Ownership – Results of Consultation, November 10, 2015</u> "The study's findings show that in urban Canadian municipalities with very active ticketing and licensing enforcement the reported bite rate was much lower. This finding indicated to the authors that higher levels of enforcement led to a reduction in dog bites and it also led to more reporting by members of the public."

It seems evident now that the "educate first" approach to enforcement, practiced in Toronto over past years, has produced little tangible results towards:

- more compliance with on leash laws

- compliance with dogs prohibited areas in Toronto

(§ 608-34. Dogs. PROHIBITED AREAS: [Added 2007-07-19 by By-law 790-200713] § 608-34. Dogs. PROHIBITED AREAS: [Added 2007-07-19 by By-law 790-200713]:

A. Natural or environmentally sensitive areas (including designated ravines, wooded or savannah areas, sites of natural or scientific interest, areas which have undergone significant habitat restoration, wetlands or their buffer zones)

- B. Playgrounds, splash pads or wading pools.
- C. Horticultural display areas or ornamental gardens.
- D. Skateboard bowls, tennis courts and other sports pads.
- E. Sports fields and stadiums.
- F. Artificial or natural ice rinks or toboggan hills.
- G. Animal display areas.
- H. Campgrounds. [Amended 2009-10-27 by By-law 1093-200914]
- I. Areas posted to prohibit dogs from entering.

-securing more safety at public places in general from increasing number of bites/harm

-making city parks safe for all users

-protecting city natural heritage (the ESA/ANSI/PSWs, ravines) and native wildlife from a significant harm as a consequence of off leash dogs and OLAS

- Lax enforcement together with ballooning dog population (600.000 as city acknowledges now), the insufficient promotion of responsible dog ownership, the absence of relevant education on dogs environmental impacts - all of this may have resulted in a steady rise of non-compliance with the on leash laws, a rise of bites/harm to public and the significant impacts on native wildlife/the city natural area and environment in general.
- A decreasing licensing rate speaks volumes on the state of dog population management. According to Toronto Off Leash Strategy "In 2024, there were 44,229 dogs licensed with the City. Toronto's number of licensed dogs has decreased by over 21 per cent since 2017, even while national surveys indicate rising rates of dog ownership suggesting decreasing compliance with pet licensing requirements" <u>https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254202.pdf</u>
- Toronto's growing dog population is adding pressure to already crowded public spaces.

"A walk in the park. A stroll on the beach. A breath of fresh air. These could soon be some of the treatments the doctor orders to cure what ails you.

The COVID-19 pandemic has increased Canadian awareness of the importance of nature. A survey of 1,600 urban Canadians last June showed that 70 per cent of respondents have increased appreciation for parks and

green spaces, 82 per cent view parks as important to their mental health and 70 per cent to their physical health.

Municipal, provincial and federal policies in Canada have underinvested in nature conservation, according to observers. Ontario doctors set to turn over a new leaf with program that lets them prescribe 'nature' to ailing

"In Toronto, the battle over limited green space is playing out on school grounds, pitting tyke against pooch. "There are signs everywhere that say, 'No dogs'," says MacMillan, whose son attends Jean Lumb Public School, adjacent to the park in the downtown CityPlace neighbourhood. Still, she's been cursed at and told it's her young son who should be tethered." <u>'Kids versus dogs': Tensions flare at Toronto schools over poop,</u> <u>unleashed pets and a lack of green space</u> March 15, 2025

- Public suffers rising number and severity of bites. Numbers of fatalities are on rise as well.

"Dog attacks in and around Toronto have become increasingly common and can happen anywhere. The increasing frequency of dog attacks in the city has caused concerns in recent years and has drawn attention from both the public and city officials. This disturbing trend has been prevalent throughout the city and tends to rise during the warmer months. The increase in incidents has forced discussions to occur amongst city councillors and residents (both dog owners and non-dog owners) about responsible pet ownership, the efficacy of existing legislation, and the actions needed to ensure public safety." How Common Are Dog Attacks in Toronto? April 7, 2025

A very unfortunate situation, as it evolved in around Liberty Village, was to a degree advanced by the local dog owners non-compliance with on leash laws, the entitlement, as much as the absence of science based education on dogs impacts on wildlife.

"While most recent attacks have been on dogs that were leashed, the City of Toronto believes offleash dogs in undesignated areas are contributing to coyote attacks." <u>Protecting their pack: Liberty</u> <u>Village residents band together to stay safe from coyotes, February 7, 2025</u>

Non-compliance was normalized in Toronto, as a logical side-effect of the long term absence of a meaningful enforcement, while the entitlement was reinforced.

As an example of normalized non-compliance, can serve my recent observation from High Park during the prescribed burn this past week. Despite high numbers of volunteers and city staff, everybody wearing yellow vests, a considerable number of dog owners were permitting dogs off leash in the on leash areas as if knowing that this was OK. A stream of dog owners were walking dogs off leash outside the fenced area of the OLA from the Parkside Drive direction. They were just doing *"what everybody else is doing"* I was told. Earlier that day, I learnt from the staff that recently in the on leash area a raccoon was ripped apart by several dogs. Meanwhile, I could observe how CDW gave the freedom to one of his clients, who in no time jumped to Upper Duck Pond to chase all what moved.

This is how normalized non-compliance has become in Toronto, even on the grounds of the city significant and mostly protected High Park/ESA/ANSI/PSW.

- Implementing of the city adopted environmental laws in respect to the ESAs would be very helpful and also in conformity with the policies.

The City Official Plan adopted a high level of protection regarding designated natural heritage <u>Toronto Official</u> <u>Plan Office Consolidation February 2019 Chapter 3,4 Natural Environment</u>

The ESA/ANSIs : "Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas"

Wildlife gets killed and inhibited by off leash dogs, while trampling suppresses vegetation.

<u>List of references to off leash dogs impacts in High Park – Terrestrial Biological Inventory, TRCA, 2019.pdf</u> includes about 20 references to dogs, such as:

"**The abundance of dogs-off leash** found outside the fenced in dog park at Dog Hill may be contributing to the lack of ground nesting birds."

Sincerely,

Lenka Holubec, on behalf of ProtectNatureTO

I have participated in 2019 "City-Wide Study of Existing Dog Off-Leash Areas. Design, Operations, Maintenance & Best Practices, Stakeholder Workshop" and more recently in "Citywide Approach to Dogs Off-Leash Areas", initiated in Sept 23, 2023 by <u>Councillor's Chris Moise Letter</u>.

Found in 2016, <u>ProtectNatureTO</u> focus is to advocate for the protection of Toronto's natural areas. Toronto's dog population effects on city's remaining valuable natural areas and native wildlife were naturally at the forefront of conservation concerns since the start - <u>Dogs in Natural Areas</u>. This organization met several times with Directors, Bylaw Enforcement, Municipal Licensing and Standards, the BEO's and the various city staff to discuss how to improve enforcement and compliance in natural areas, education on dogs impacts, siting of OLAS, etc.

References:

<u>Pet dogs have 'extensive and multifarious' impact on environment, new research finds</u> Apr 9, 2025 Pet dogs have 'extensive and multifarious' impact on environment, new research finds due to a scale of environmental damage attributed to huge number of dogs globally as well as 'lax or uninformed behaviour of dog owners'.

A simple way to mitigate against the worst environmental effects of dogs is to keep them leashed in areas where restrictions apply, according to new research.

The carbon footprint of pets is also significant. A 2020 study found the dry pet food industry had an environmental footprint of around twice the land area of the UK, with greenhouse gas emissions – 56 to 151 Mt CO2 – equivalent to the 60th highest-emitting country.

The review's lead author, Prof Bill Bateman of Curtin University, said the research did not intend to be "censorious" but aimed to raise awareness of the environmental impacts of man's best friend, with whom humans' domestic relationship dates back several millennia.

"To a certain extent we give a free pass to dogs because they are so important to us ... not just as working dogs but also as companions," he said, pointing to the "huge benefits" dogs had on their owners' mental and physical health. He also noted that dogs played vital roles in conservation work, such as in wildlife detection.

"Although we've pointed out these issues with dogs in natural environments ... there is that other balancing side, which is that people will probably go out and really enjoy the environment around them – and perhaps feel more protective about it – because they're out there walking their dog in it."

Angelika von Sanden, a trauma therapist and the author of Sit Stay Grow: How Dogs Can Help You Worry Less and Walk into a Better Future, said she had observed that for many clients the companionship of a dog was often "literally the only reason to survive, to get up, to still keep going".

"It gives them a reason to get up, a reason to get out, a reason to move around and be in contact a little bit with the world outside," she said.

"Dog owners can get a bad name if they are not aware of the surroundings they are in and of other people around them."

"The Global Invasive Species Database states that domestic dogs threaten a total of 200 IUCN Red List species. Thirty of these species are classed as critically endangered, 71 are listed as endangered, and 87 are listed as vulnerable. Dogs have contributed to the extinction of nearly one dozen wild bird and animal species. Feral dog populations or domestic dogs left to roam are the biggest perpetrator of these issues. **As such, dogs have become the third worst human-introduced predator after cats and rats."**

Pets as Invasive Species: Dogs, BiodoversityCenter, UofTexasatAustin, May31 2023

Good boy or bad dog? Our 1 billion pet dogs do real environmental damage, April 9, 2025

We are all too aware of the negative effects of cats, both owned and feral, on wildlife. By contrast, our pet dogs often seem to get a free pass. This is, unfortunately, based more on feelings than data. Our beloved pet dogs have a far greater, more insidious and more concerning effect on wildlife and the environment than we would like to be the case. In our new research, we lay out the damage pet dogs do and what can be done about it.

Dogs are predators. They catch many types of wildlife and can injure or kill them. Their scent and droppings scare smaller animals.

Then there's the huge environmental cost of feeding these carnivores and the sheer quantity of their poo. We love our pet dogs, but they come with a very real cost. We have to recognise this and take steps to protect wildlife by leashing or restraining our animals.

Pet dogs are responsible for more reported attacks on wildlife than are cats, according to data from wildlife care centres, and catch larger animals.

Pet dogs off the leash are the main reason colonies of little penguins are nearing collapse in Tasmania.

Little penguins are easy prey for pet dogs off the leash. This penguin was killed by a pet dog in Tasmania in 2017.

In New Zealand, a single escaped pet dog is estimated to have killed up to 500 brown kiwis out of a total population of 900 over a five-week period.

Once off the leash, dogs love to chase animals and birds. This may seem harmless. But being chased can exhaust tired migratory birds, forcing them to use more energy. Dogs can kill fledglings of beach-nesting birds, including endangered birds such as the hooded plover.

The mere presence of these predators terrifies many animals and birds. Even when they're on the leash, local wildlife are on high alert. This has measurable negative effects on bird abundance and diversity across woodland sites in eastern Australia.

In the United States, deer are more alert and run sooner and farther if they see a human with a leashed dog than a human alone.

Several mammal species in the United States perceived dogs with a human as a bigger threat than coyotes.

Dogs don't even have to be present to be bad for wildlife. They scent-mark trees and posts with their urine and leave their faeces in many places. These act as warnings to many other species. Researchers in the US found animals such as deer, foxes and even bobcats avoided areas dogs had been regularly walked compared to dog exclusion zones, due to the traces they left.

Beach-nesting birds such as hooded plovers are vulnerable to off-leash dogs, who can easily trample eggs, kill hatchlings or scare off the parents.

Keeping dogs healthy and fed has a cost

The medications we use to rid our pet dogs of fleas or ticks can last weeks on fur, and wash off when they plunge into a creek or river. But some of these medications have ingredients highly toxic to aquatic invertebrates, meaning a quick dip can be devastating.

Ontario doctors set to turn over a new leaf with program that lets them prescribe 'nature' to ailing patients

A walk in the park. A stroll on the beach. A breath of fresh air. These could soon be some of the treatments the doctor orders to cure what ails you.

The COVID-19 pandemic has increased Canadian awareness of the importance of nature. A survey of 1,600 urban Canadians last June showed that 70 per cent of respondents have increased appreciation for parks and green spaces, 82 per cent view parks as important to their mental health and 70 per cent to their physical health.

Municipal, provincial and federal policies in Canada have underinvested in nature conservation, according to observers.

"We haven't invested well in pockets of natural spaces in cities," says Toronto health economist Jean Hai Ein Yong. "We need to strike a balance. Nature excursions to forests are not feasible for everyone. But we can spend our lunch break in a pocket of nature in a city like Toronto. Cities need to figure out how businesses support public spaces."

Nazanin Meshkat is an emergency physician and associate professor at the University of Toronto.

Don't Worry, She's Friendly!

Furry hordes are taking over our parks, schoolyards and streets. The near-impossible challenge of living cheek by drooling jowl in a dog-mad, mad-dog city July 17, 2024, Toronto Life

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"I asked Moise whether implementing off-leash spaces in existing parks will just result in more scenarios where the lines between the designated zone and its surrounding areas have blurred. Perhaps we need to change our mindset, he countered. The question reminded him of how he used to bring his terriers to the East Coast so they could walk on the beach and play in the ocean. "Dogs here miss out on a lot of those things," he said. Maybe it's okay to let a dog walk off-leash on a wooded trail, he said. Maybe it's a bit like suburban sprawl: there are areas where people keep building into nature, and then they complain that the bears and the coyotes are coming into their space. "Meanwhile," he added, "they were there first. A dog's not a bear, but it's an animal too."

How Common Are Dog Attacks in Toronto? April 7, 2025

"Dog attacks in and around Toronto have become increasingly common and can happen anywhere. The increase in dog attacks in and around Toronto indicates that additional measures are needed to protect Torontonians. More responsibility needs to be taken by dog owners to limit these incidents as well. All residents of Toronto should be able to be outdoors safely without any concerns about being attacked and bitten by a dog." Rise in dog attacks in Canada, April 10, 2024

"What's behind the spike in attacks? Is it pandemic puppies, as some suggest? Lax enforcement? Incompetent owners? All of those and more? And more importantly, what are we doing about it?"

12 Canadian Dog Bite Statistics 2025: Breeds, Incidents, Deaths & FAQ

" It's estimated that there are over 500,000 dog bites annually in Canada.

About 500 Canada Post workers are bitten every year.

Canadians are twice as likely to be bitten by a dog in a city than in the country.

Children ages 5 to 9 years are most commonly bitten by a dog.

Adults are most commonly bitten on the hands and young children on the face and neck.

It's estimated that there are one to two fatalities in Canada from dog attacks yearly.

Of the 28 fatalities between 1990 and 2007, 24 of them were children under 12.

The prairie provinces had the highest incidents of fatal dog attacks."

Calgary dog owners disturbing nature by breaking leash rules, letting pooches run free December 20, 2024

Calgary has one of the largest combined off-leash spaces in North America, according to the city, with 13 per cent of Calgary's parkland open for dogs to run free. Since 2013, Calgary has used an off-leash ambassador program to promote "responsible pet ownership and safety in off-leash areas."

A list of Calgary's 160 public off-leash dog areas is available on the city's website. The City of Calgary issued 381 off-leash dog tickets in 2023.

Through the program, volunteers remind dog owners to follow city bylaws and clean up after their canines. Peace officers also warn and issue tickets to dog owners found breaking the rules. The base fine for having an off-leash dog in an on-leash area is \$150.

"Remote cameras captured 50,000 detections of off-leash dogs in on-leash areas. Dog owners in all four Calgary quadrants are regularly breaking the city's off-leash dog rules. Data from a remote-triggered camera project called Calgary Connect shows owners are letting their dogs loose in green spaces home to coyotes, raccoons and other critters.

From 2017 to 2022, the Miistakis Institute tracked animal sightings in Calgary's natural areas through a network of remote-triggered cameras. It snapped photos of off-leash dogs running free in Calgary's natural areas on 50,247 separate occasions. Seventy-two per cent of the pooches caught on camera were off-leash in on-leash areas.

"It matters because it's very disruptive to park users and wildlife," said Tracy Lee, director of conservation at the Miistakis Institute."

Supplemental Report: Enforcement Approach for Off- Leash Areas and Parks Date: April 22, 2025 To: City Council From: Executive Director, Municipal Licensing and Standards

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"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."

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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

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.

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 CSPA, 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.

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) Enforcement Approach for Off-Leash Areas and Parks Page 8 of 9 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."

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

- IE20.9 Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas
- (April 8, 2025) Letter from Lenka Holubec, on behalf of ProtectNatureTO (IE.Supp)

https://www.toronto.ca/legdocs/mmis/2025/ie/comm/communicationfile-189000.pdf

Recent submissions on dogs related topics in Toronto:

⁽April 8, 2025) Letter from Lenka Holubec, on behalf of ProtectNatureTO (IE.New)

https://www.toronto.ca/legdocs/mmis/2025/ie/comm/communicationfile-189085.pdf

EC18.8 - Developing an Urgent Downtown Coyote Action Plan

https://secure.toronto.ca/council/agenda-item.do?item=2025.EC18.8

EC18.8 - Developing an Urgent Downtown Coyote Action Plan, Feb 26, submission Lenka Holubec <u>https://www.toronto.ca/legdocs/mmis/2025/ec/comm/communicationfile-187944.pdf</u>

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

EC10.2 - Response to EC6.9 - Incident and Operational Review of Serious Dog Attacks

(March 20, 2024) Submission from Lenka Holubec, ProtectNatureTO (CC.New) https://www.toronto.ca/legdocs/mmis/2024/cc/comm/communicationfile-178192.pdf

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

IE6.8 - Citywide Approach to Dogs Off-Leash Areas

(September 20, 2023) Letter from Lenka Holubec (IE.New) https://www.toronto.ca/legdocs/mmis/2023/ie/comm/communicationfile-172288.pdf

https://secure.toronto.ca/council/agenda-item.do?item=2023.MPB4.1

MPB4.1 - 2023 Operating and Capital Budgets

(February 15, 2023) Letter from Clyde Robinson, on behalf of Ashbridge's Bay Nature Stewards and Lenka Holubec, member of ProtectNatureTO (MPB.Supp) <u>https://www.toronto.ca/legdocs/mmis/2023/mpb/comm/communicationfile-165731.pdf</u>