

URBAN HENS TORONTO PROGRAM REVIEW ANIMAL JUSTICE SURVEY GUIDE (2023)

Toronto launched the UrbanHens TO pilot program on March 2, 2018 to allow registered households to keep up to four hens for “enjoyment and egg production.” The City is now consulting with the public and preparing a staff report on the future of the program and is considering making the UrbanHens TO program permanent and city-wide.

Animal Justice **strongly opposes the continued expansion of the UrbanHens TO program**. Although chickens are intelligent, social, and inquisitive animals who make wonderful companions, allowing backyard chickens as a form of urban agriculture poses serious risks to animals’ welfare. Indeed, chickens can live for more than 12 years, yet their egg production capacity often declines early on in life. Adequately caring for chickens over the course of their lives requires significant time, energy, space, and financial resources. When individuals keep chickens in urban settings for backyard egg production, a significant number of chickens are inevitably abandoned or escape,¹ or are surrendered to local shelters and sanctuaries.² Many chickens may be abandoned due to the cost or inaccessibility of veterinary care in urban settings. This places a significant burden on law enforcement officials as well as local rescue groups and sanctuaries. Other unwanted chickens may be unnecessarily euthanized or sent to slaughter.

As part of the public consultation process, the City has created an online survey to help inform staff recommendations. It closes on **February 7, 2023**. This guide is intended to assist concerned Torontonians in filling out the survey.

UrbanHens TO Program Overview:

The zones and wards currently included in the UrbanHens TO program are outlined on the City of Toronto’s website. In April, 2022, the program was expanded to include Ward 4 (Parkdale-High Park), Ward 9 (Davenport), Ward 10 (Spadina-Fort York), Ward 11 (University-Rosedale), and Ward 19 (Beaches-East York).

Some general requirements of the program include: Hens must be at least four months old when acquired and roosters are not permitted; Participants must register their coop with the City; Hens are for the purposes of enjoyment and personal egg production and are not to be slaughtered by residents for food; and Residents residing in apartment buildings, condominium buildings, and/or properties without sufficient outdoor space to house the hens are not permitted to participate.

Survey Link:

The survey is available at the following link. Under the “Share Your Views: 2023 Report on UrbanHens TO” heading, click “Take the online survey”:

<https://www.toronto.ca/community-people/animals-pets/pets-in-the-city/backyard-hens/?preview=true/?accordion=share-your-views-2023-report-on-urbanhensto>

¹ See, e.g. <https://ottawa.ctvnews.ca/calls-to-ottawa-by-law-for-loose-chickens-more-than-double-from-pre-pandemic-levels-1.5637656>.

² See, e.g. <https://globalnews.ca/news/5244523/montreal-sPCA-abandoned-chickens/>.

Answer Guide:

Has your household participated in the UrbanHens TO program?

- Answer honestly.

If you were allowed to keep hens, would you be interested in doing so?

- We recommend answering “not at all interested”, for the below noted reasons.

Why do you have that opinion?

- Check all boxes that apply and consider adding your own reasons under “other”. *Please try to use your own words where relevant in this section (and all subsequent comment sections) as that is a more effective form of advocacy.*
- **“Other” reasons you may want to point to include:** (i) increased risk of disease in the community (i.e. salmonella, avian flu, etc.); (ii) concerns regarding the welfare of animals being kept in areas without sufficient space to explore and engage in natural behaviours and leaving them exposed to extreme weather; (iii) the risk of further overburdening shelters and rescue groups caring for seized, surrendered, or abandoned chickens; (iv) the program is an unnecessary drain on city enforcement funds (i.e. responding to noise, odour, and welfare complaints from neighbors); and (v) there is not adequate access to veterinary care for chickens in the Toronto area.

If hens were allowed to be kept in Toronto, how concerned would you be if your neighbor told you they were considering getting them?

- Answer honestly

Are you concerned that backyard poultry can lead to problems with wildlife and other animals?

- Concerned

Do you agree that UrbanHens TO should be expanded to all City of Toronto Wards?

- Disagree

Why do you have that opinion?

- Check all boxes that apply and consider adding your own reasons under “other”.
- **“Other” reasons you may want to point to include:** (i) the program does not meaningfully address food insecurity (despite being billed as such) and would be out of reach for most low-income residents who are struggling with food insecurity; (ii) the risk of further overburdening shelters and rescue groups caring for potentially seized, surrendered, or abandoned chickens.

If the program is expanded, how can the City improve access for residents without adequate outdoor space?

- N/A or “The program should not be expanded. The City should invest its resources in projects that will meaningfully address food insecurity experienced by low-income residents (including community food banks).”

If the program is made permanent, are you supportive of community hen-keeping projects?

Note: The projects may be associated with a community or non-profit organization and would be intended to help address individual cost barriers and allow residents without sufficient private outdoor space to participate in the program.

- Answer honestly. We recommend answering “0” on the scale (i.e. unsupportive) for the reasons set out below.

Why do you have that opinion?

- Something along the following lines (*preferably in your own words*):
- Concerns with community hen-keeping include: (i) the need for clear and mandatory coop and space requirements to ensure hens have sufficient space and can engage in natural behaviours both indoors and outdoors; (ii) the need for regular, unannounced inspections to monitor conditions at community sites; (iii) the need to ensure regular access to veterinary care; (iv) ensuring chickens are not slaughtered or surrendered to persons for slaughter purposes throughout the course of their life, even after egg production declines; (v) concerns regarding disease risk and transmission in the broader community; (vi) potential risks of increased noise, odours, and the attraction of unwanted wildlife; and (vii) risks of vandalism or other forms of mistreatment if chickens are left unattended.

If the program is expanded, do you believe that any of the following should be required (select all that apply)?

- Suggest selecting the following: (i) annual registration requirement, (ii) one-time registration fee upon application; (iii) annual renewal fee; (iv) required inspection of hen coop by Toronto Animal Services (TAS); (v) a formal education or training requirement; (vi) a requirement to solicit approval from neighbours to keep hens; (vii) requirement to submit site plan to the City, (viii) requirement to get approval from property owner (if renting)
- **Suggestion for “Other” requirement:** (i) unannounced inspections of City hen-keepers to ensure they are providing adequate care.

Please provide additional comments on these potential program requirements

- We suggest commenting something along the following lines: If the City moves forward with this program (which it should not do), robust regulations, inspections, and training

should be required to ensure animals kept within the City are properly treated. The City must invest significant resources into a robust regime to regulate the keeping of hens in an urban setting if it is to be allowed. All costs associated with enforcement and oversight, as well as caring for abandoned and surrendered hens, should be covered by those participating.

If the program is expanded and a one-time application fee is required, what would be a reasonable amount?

- Answer honestly (we recommend selecting a higher option on the scale. If the program goes forward, higher fees will lead to increased funding for the program, and a barrier for entry which may deter individuals who aren't serious about committing to caring for the animals).

If the program is expanded and an annual renewal fee for registration is required, what would be a reasonable amount?

- Answer honestly (we recommend selecting a higher option on the scale. If the program goes forward, higher fees will lead to increased funding for the program, and a barrier for entry which may deter individuals who aren't serious about committing to caring for the animals).

Note: A short paragraph is included explaining that there is a lack of veterinary care available for hens in the City of Toronto and Greater Toronto Area.

Were you aware that there are a limited number of veterinarians in Toronto that have the accreditation required to care for hens?

- Answer honestly

If you were to keep hens on your property, would you be concerned about potential challenges in accessing veterinary care?

- Concerned

Note: A short paragraph is included explaining that backyard hens can increase the risk of transmission of diseases like avian influenza (i.e. bird flu).

Were you aware of the presence of avian influenza in Canada?

- Answer honestly

If your neighbor told you they were considering getting hens, how concerned would you be about possible transmission of avian influenza and other diseases?

- Concerned

In an expanded program, do you think it is important that potential registrants be required to clearly demonstrate their knowledge of biosecurity protocols related to avian influenza and other disease transmission prior to keeping hens?

- Yes

Please provide additional comments on avian influenza and disease transmission.

- We recommend commenting along the following lines (*preferably in your own words*):
- Chickens are susceptible to diseases that can cause serious illness and even death in wild and kept birds and some of these diseases can even infect people. According to the Centers for Disease Control and Prevention, backyard chickens may carry bird flu (avian influenza), E. coli, and Salmonella bacteria, among several other diseases
- While there are certain measures taken in the Program which help to mitigate disease transmission—such as coop cleanliness requirements, prompt disposal of dead animals, and timely waste management—these measures alone cannot prevent the inevitable spread of disease between wild animals, backyard hens, and even humans. This is especially true given the limited physical and financial capacity of City officials to consistently inspect and enforce the requirements of sanitary backyard hen ownership at all sites in the City. The fact remains that increasing the number of backyard coops increases the risk of disease transmission.

Note: A short paragraph is included explaining issues with food security / sovereignty (i.e. the inadequate or insecure access to food due to financial concerns – strongly linked to poverty). It is also explained that the costs associated with hen-keeping can range from \$100 - \$5,000, with the average cost per household being over \$1,000 to set up a coop alone.

What level of impact do you think backyard hen keeping can have on addressing food insecurity and/or sovereignty in Toronto?

- We recommend answering “0 – No Impact”, for the reasons set out below.

Please share why you have those opinions

- We recommend answering by highlighting the below points:
- The average cost of setting up these operations is prohibitive for most, if not all, low-income households who struggle with food insecurity. This is compounded by prospective additional costs such as feeding the hens a proper diet and providing regular and emergency veterinary check-ups for the hens. In many cases, individuals would have to travel outside of the City for speciality care for these animals at an increased cost to them.
- Many people in the City of Toronto (particularly low-income individuals) do not have adequate outdoor space to raise hens. Low-income households are often renters in smaller

spaces in the City (i.e. apartment buildings) and would not be allowed to engage in hen-keeping as a result of space requirements.

- Hens require specialized care. The level of expertise, resources, and time needed to raise healthy hens with a high quality of life is prohibitive for many individuals.
- The City should redirect time and resources into supporting local food banks and other community outreach programs (including programs encouraging growing fruits and vegetables) as these are more effective ways to combat food insecurity in Toronto.

Please provide any additional comments about UrbanHens TO in general

- We recommend emphasizing any of the above-noted points which resonate most strongly with you. Otherwise, raise any additional issues that you believe the continuation of the UrbanHens TO may give rise to.

Personal Post-Survey Questions

- Answer honestly whenever you are comfortable doing so.