November 16, 2018

VIA EMAIL

City of Greater Sudbury
Brendan Adair, Manager of Security and By-Law Services
Email: Brendan.Adair@greatersudbury.ca

Dear Mr. Adair:

Re: Public Health considerations regarding backyard chickens

This letter and enclosure are intended to provide public health information in support of municipal deliberations regarding potential amendments to existing by-laws to allow for backyard hens beyond the agricultural and rural zones of the City of Greater Sudbury.

Public Health Sudbury & Districts recognizes that there are risks and benefits associated with keeping and maintaining hens in backyards. Evidence indicates that risks may be reduced through evidence informed risk mitigation strategies that include education, regulatory and economic elements. Benefits, risks, and risk mitigation strategies are further outlined with the enclosure.

Should City Council approve moving forward with changes related to backyard hen by-laws, Public Health Sudbury & Districts recommends a pilot project, similar to the UrbanHensTO Pilot Program, where risks are considered, mitigated and evaluated. Should City Council proceed, Public Health Sudbury & Districts would value the opportunity to work with the City to provide support in the identification and mitigation of risks, education and overall evaluation.

Should City Council proceed, Public Health Sudbury & Districts recommends that a licensing/registration process be implemented as this would allow for:

- Single point of contact with bird owners which supports the sharing of educational material.
- Trace-back to flock owners, should an event occur requiring immediate contact with flock owners e.g. highly pathogenic virus.
City planners to avoid high density pockets of birds.
City assessment and risk mitigation related to Source Water Protection.

It is further recommended that any amended by-laws:
- Prohibit chicks and roosters.
- Limit the number of hens.
- Provide specifications regarding coop construction, waste management, and food storage.

Should you have any questions or need further information please contact Holly Browne, Manager, Environmental Health at ext. 246, browneh@phsd.ca or Bridget King, Registered Dietician, Health Promotion at ext. 288, kingb@phsd.ca.

Yours Truly,

Stacey Laforest
Director, Environmental Health

And

Sandra Laclé
Director, Health Promotion

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Encl:
Backyard Hens – City of Greater Sudbury

cc. Dr. Penny Sutcliffe, Medical Officer of Health
**Backyard Hens – City of Greater Sudbury**

Public Health Sudbury & Districts recognizes that there are risks and benefits associated with keeping and maintaining hens in backyards. Evidence indicates that risks may be reduced through evidence informed risk mitigation strategies that include education, regulatory and economic elements.

**Benefits**

**Health and Wellbeing**
- Evidence suggests that backyard hens may enhance neighbourhoods through a heightened sense of community.
- Hens are people friendly, social, intelligent, and affectionate, they can provide companionship and may contribute to improved mental health.

**Food Literacy and a Sustainable, Resilient, and Healthy Food System**
- Backyard hens provide the opportunity for individuals to interact with their natural environment and learn about the food system. Learning about the food system is an essential component of supporting a sustainable food system. The connection to our food supply that backyard hens support is important because it enhances food literacy (Food Literacy, 2018). At a population level a loss of food literacy has been identified as an impediment to healthy eating behaviours (LDCP, 2013).
- Provide owners the opportunity to learn about responsible animal care.
- May allow for personal autonomy and independence regarding food choices.

**Nutrition**
- Research is inconclusive regarding the nutrient content differences among free-range, organic, or conventionally raised hens. Hens fed an omeg-3 supplement lay eggs that contain omega-3 fats, which could be beneficial, however, more research is needed (Coleman Collins, 2018).

**Myths**
- Hens address food insecurity – food insecurity is caused by inadequate incomes. Owning backyard hens is expensive (purchasing hens, chicken housing and equipment, feed, and veterinary services, disposal of deceased hens, eggs may still need to be purchased depending on size of household) a cost benefit analysis has not been conducted but it is unlikely hens will positively impact an owner’s income (reduce food insecurity). Food insecurity is addressed through income solutions.
Hens reduce household waste - Chickens may eat some kitchen scraps but not to the exclusion of other commercially prepared foods; impact on waste reduction likely negligible.

Risks

Infectious Diseases

- Poultry can carry Salmonella in their intestines or eggs without symptoms of illness which can be transferred onto feathers and surrounding environment.
- Salmonellosis and campylobacteriosis are the most frequent infections reported in relation to backyard chicken and live poultry exposure, however other pathogens have been linked to backyard poultry flocks.
- Transmission of avian influenza from wild birds to backyard chickens and subsequently to humans is a possibility.

Chicken Waste

- Fecal waste from poultry contains pathogens which may infect humans or other animals. Improper containment, handling and disposal of this waste can lead to increased illness and cost to the health care system.
- Methods of disposal of diseased and deceased poultry should be examined to ensure that the risk to humans and other animals is minimized.

Predators and Pests

- Backyard chickens may attract predators such as foxes, raccoons, coyotes, bears and wolves to urban areas.
- Backyard poultry flocks may have ectoparasites, such as lice, fleas and mites, which can affect humans. This could lead to a need for increased biosecurity.

Nuisance Factors

- Noise - Hens usually cluck softly, but will squawk during or shortly after laying an egg, or if frightened. Compared with other common pets, squawking is relatively quiet.
- Odour – Chicken manure and food scraps may create nuisance odours.

Risk Mitigation

Education

Increased flock owner education and awareness is essential in order to mitigate potential public health risks. Several current resources address issues of infection control, manure disposal, personal hygiene, basic chicken husbandry, food safety, and pest control:
Website: http://www.omafra.gov.on.ca/english/livestock/urbanagbib/poultry.htm

Video – Bird Health Basics – How to Prevent and Detect Disease in Backyard Flocks and Pet Birds
http://inspection.gc.ca/animals/terrestrial-animals/biosecurity/tools/video/eng/1320092234079/1322158553549

Resource Kit - Keeping Your Birds Healthy– Free to order – Ontario Ministry of Agriculture, Food and Rural Affairs
Contains information on:
- Introduction to Biosecurity
- Seven Principles of Biosecurity
- Feed and Water Management
- Cleaning and Disinfection
- Introduction to Disinfectants
- Disposal of Bird Mortalities
- Introduction to Disease
- Foreign Animal Disease
- Dealing with Sick Birds
- Integrated Pest Management
- Understanding Antibiotics
- Disease Factsheets on CD
- Weatherproof Restricted Entry Sign
- Visitor Log Book
- Brochures and Posters

Regulation
- A licensing/registration process for backyard hens supports:
  - Single point of contact with bird owners which supports the sharing of educational material.
  - Trace-back to flock owners, should an event occur requiring immediate contact with flock owners e.g. highly pathogenic virus.
  - City planners to avoid high density pockets of birds.
  - City assessment and risk mitigation related to Source Water Protection.
- By-laws should:
  - Prohibit chicks and roosters.
  - Limit the number of hens.
  - Provide specifications on coop construction, waste management, and food storage.
Economics
Public Health Sudbury & Districts suggests:
- Free licencing/registration to help ensure that birds are registered and cared for.
- Cost-effective means of disposing of dead or sick birds.

Surveillance
The following activities would be supportive of surveillance efforts:
- Ensure that public health is aware of this potential source of pathogens when investigating relevant disease outbreaks.
- Pest control companies could amend call records to include a field about whether backyard chickens were present at households attended for pest control.
- Public Health Ontario investigation tools for salmonella and campylobacter now include a risk factor of contact with backyard chickens with individual communities listed where backyard chickens are permitted.
- Require owners to report unexplained deaths of backyard chickens to allow for surveillance of potential avian pathogens that could spread to large flocks or possibly transfer to humans.

Evaluation
- If evaluation is introduced, recommend that the following be considered: number of households keeping hens, reasons for keeping hens, any health events in either humans or hens over a defined time period, calls made to inspectors, costs to owners and municipality, complaints by neighbours, and calls to pest control companies from urban backyard poultry owners.
- Mandatory licensing/registration would facilitate access to owners.

Please find below, examples of by-laws from other Ontario municipalities:
- **New Market** – started as a pilot
- **Kingston**
- **Toronto** – pilot underway
- **Mattawa**
- **Kitchener**
- **Orillia** – pilot underway
- **Guelph**
- **Meaford**
- **Huntsville**
- **Lake of Bays**
- **Severn Township**
- **Niagara Falls**
- **Trent Hills**
- **Bracebridge**