

Dear Mayor and Councillors:

Re: Grow Veggies Not Chicken Eggs

Lifeforce is a Vancouver-based ecology organization that looks at the interrelationship of human, animal and environmental issues. When trying to resolve problems one must take into consideration the long term impacts on all life.

For over a decade we have opposed any "city farming" plans that involve animals. We hope that Vancouver will not allow the keeping of poultry or any other livestock because it would result in major health and animal welfare issues.

Poultry Industry History

There are government mandated "Bio Security" procedures for poultry operations in order to try to avoid Avian Influenza. This includes wearing face masks and changing clothes/showering after contact with poultry. It would be prudent that similar cautionary procedures be implemented with small scale operations to avoid animal or human health problems.

A Canadian Food Inspection Agency (CFIA) disease-control specialist says backyard flocks are a concern because they have more contact with wild waterfowl, the main carriers of avian flu. The risks associated with the exposure of smaller flocks to wild waterfowl cannot be ignored.

The CFIA suggests flock owners abide by a three-step cleaning and disinfection process that involves the use of protective eyewear and gloves:

- a. Remove all organic material from footwear, tools and other equipment with a brush or sponge, using detergent and clean, hot water.
- b. Scrub again, using a solution of 50 millilitres of household bleach (sodium hypochlorite, five per cent to six per cent) and four litres of water. Let stand until the surface is dry.
- c. Scrub with hot water and common household disinfectant following the label directions.

CFIA also states a that in order to prevent infections from and to poultry one must limit visitors – especially those with other flocks.

Evidence that Flies Spread Avian Flu was reported in the April 2007 issue of "Poultry International". The evidence showing that common flies may be able to transmit influenza viruses in and out of poultry facilities.[7]

Before the emergence of H5N1, the largest outbreak of bird flu in history wasn't in Asia; it was in Pennsylvania in 1983-84, resulting in the costliest animal disease eradication in U.S. history and the deaths of 17 million birds. In this U.S. outbreak of a highly pathogenic H5N2 strain, researchers found that over one-third of mature houseflies recovered from affected facilities were carrying the virus. Universal fly infestation is inherent to poultry production. One cannot effectively keep flies out of a poultry facility.

[7] Mabbett T. 2007. Another good reason to control houseflies: they carry bird flu virus. Poultry International. April, pp. 16-7.

The cause, control and of prevention of avian flu is still somewhat of a mystery. Mutation of viruses and cross species infections are a major health concern. If someone gets their chickens from auction or a

farmer it is possible that they might have a form of avian flu (or other health threat). Even visiting a farm to buy the chickens can incur and spread infections.

Health Issues

1. Poultry would most likely be obtained from industry sources that sell the same poultry species that are vulnerable to Avian Influenza. So permitting chickens in Vancouver exposes more people to health risks and supports the inhumane factory farming industry (that many are realizing is not humane and healthy).

Supporting the Factory Farm Industry should not be supported by Vancouver's Greenest City Action Team.

2. Poultry with unknown backgrounds could also be obtained from animal auctions. They are usually not in good health and pose health risks to people. The chickens may have been given anti-biotics. The issues regarding the use of antibiotics and/or anti-biotic resistant bacteria could apply depending on the source of chickens.

It is unlikely that a bylaw could mandate where a person must purchase the chickens. If it could be done the enforcement would be problematic.

3. Animal wastes, ammonia, "poultry dust" etc. can pose environmental and human health threats. One major risk is aerosol dust that is small enough to reach lungs and cause pulmonary disease.

Harmful particulate matter would be on the property and could also spread to contaminate neighbours' properties.

For obvious reasons, such as E coli infections, Safety Food Inspection regulations stipulate that no "manure dust particles" is permitted on veggies and fruits. Backyard gardens could be affected.

4. Odours from poultry could pose health hazards. Complaints about odours will also increase calls to city staff and other agencies. The manure (with nitrogen, phosphorus, ammonia) impacts on air, land and ground water quality.

5. Roosters are not compatible with neighbours. Noise complaints will increase to city staff.

6. Environmentally harmful insect and pest control methods could increase. Chickens will attract insects, mice and rats."

7. Chickens would also attract coyotes and raccoons. This is a wildlife issue as well because these wild animals would be then be trapped. Pressure may increase to deal with urban wildlife lethally.

8. Chicken feathers that are contaminated with feces and other pathogens can be transmitted within yards or to neighbouring yards. They could be picked up by a child and the child could be infected. The following report about chicken transport addresses the issue of what may be on that feather blowing in the wind. The airborne bacteria can remain harmful for up to 20 min.

In a paper by Ana Rule she states that feces, feathers and straw that fly off the transport truck can expose people to resistant pathogens. Food animal transport: A potential source of community

exposures to health hazards from industrial farming (CAFOs) Ana M. Rule*, Sean L. Evans, Ellen K. Silbergeld

“... Results indicate an increase in the number of total aerobic bacteria including both susceptible and drug-resistant enterococci isolated from air and surface samples, and suggest that food animal transport in open crates introduces a novel route of exposure to harmful microorganisms and may disseminate these pathogens into the general environment. ...”

“Increased concentrations of AHB and presumptive enterococci were isolated from the air and internal/external surfaces of cars traveling behind PTVs. This confirms the possibility of major pathogen dispersal via this route, and highlights the importance of better containment of animals and waste. Surface samples indicate that airborne bacteria, including ARB strains, can deposit on surfaces and remain viable for up to 20 min.”

9. HACCP (Hazard Analysis and Critical Control Points) certification process is something that food services providers requires from any company that is a supplier of a potentially hazardous food. “Eggs produced and marketed as “organic” or “cage-free” may not meet Risk Management food safety rules. Backyard egg producers will not meet these expensive food safety standards.

Animal Welfare/Rights and Environmental Issues

1. There would be increased burdens on animal control associations that already have their hands full making sure that dogs, cats and other pets are being treated humanely.

2. Will people know how to provide warm, comfortable housing and proper food? It will be costly to maintain adequate care and enclosures to keep them alive during extreme hot and cold weather conditions.

Chickens will not be able to roam freely in backyards because they will not stay in the yards. Large pens will have to be built to prevent them from roaming and to protect them from weather and predation. Units must be large enough to have an area to allow a separate 30 day quarantined period for new birds entering a flock.

These units would have to be separate large units (not garages) with setbacks from property. Many city lots would not be able to comply.

Vancouver Zoning and Development Bylaw states that “accessory building” must be 29.9 feet from adjacent residential structure and 60 feet from front lot line. In Niagara Falls, ON the animal Control Bylaw states chickens must be 25 feet from rear lot line and 15 feet from side. So there would have to be proper building standards developed.

Will people start building chicken barns instead of rental units? Do we want to spend the time and money on homes for chickens or people?

3. Proper veterinary care is one of the associated costs with keeping animals. Chickens are no exception. The early reporting of sick or diseased animals, especially chickens, is very important. Most people are not trained to detect early symptoms and/or will not pay the costs of taking any sick chickens to a vet.

4. The introduction of poultry in the city will increase the amount of animal wastes and animal carcasses. What will be the disposal method of dead birds that have died from unknown causes? How will the increase of straw bedding contaminated with urine and feces be disposed of?

5. Will people be permitted to slaughter the chickens? It may not be in violation of humane slaughter regulations since people may be allowed to slaughter animals for their personal consumption. This will result in untrained people killing the chickens and most likely the torturous deaths of chickens.

Peaceful neighbourhoods should not be turned into killing fields.

6. Chicks may be obtained from hatcheries. All hatcheries are part of the factory farming industry. The majority of male chicks are suffocated or crushed to death. The female chicks are usually debeaked (part of the beak is burnt off).

7. Poultry could be disposed of at auctions. LifeForce has documented abuse of poultry and other animals at the Fraser Valley Auction (closest to Vancouver). Chickens are crammed into small cages and/or non-ventilated boxes. One spent layer chicken was put into a Sunlight Laundry detergent box. (See Fraser Valley Auction abuses at <http://www.lifeforcefoundation.org/newsitem.php?id=85>)

8. In general city folks aren't farm folks and do not have knowledge or experience with farm animals. Various ethnic groups may be from countries with very poor animal care standards or no anti-cruelty laws at all. Training courses and educational materials would have to be developed to make sure that all are familiar with Canadian laws and animal care standards.

9. If you allow chickens then people may also want other types of poultry, pigs, calves and others. Cows for a little bit of milk, pigs for bacon with those eggs and sheep for some wool.

How would you permit poultry such as chickens and stop people from expanding to Silkie Chickens, turkeys, Cornish hens, game birds (Pheasant, partridge), ducks and geese? If people are allowed to keep layer chickens then how can you stop raising others, such as quail, for eggs? Where do you draw the line between raising birds for eggs or killing for meat?

This will open the barn door to more animal welfare/rights problems.

Other Negative Impacts – Tax Burdens

In addition to the costs to human health and animal welfare, there will be increase burden on city staff and others. There will be:

1. Increased responsibilities for animal control staff and city staff.
2. The possibility that people trying to operate these backyard operations will want to be classified as "hobby farms" that could receive tax reductions. If so, more will try it and the problems will increase.
3. The necessity for business licenses to sell eggs and unwanted live or dead chickens.

So Be An NIMBY and say “ Not In Metro Back Yards”

It is simply not worth the risk to human health, the likelihood of animal abuse cases and the associated management costs. Although most animal abuses, health risks to people and environmental pollution applies to small “commercial” flocks and factory farms the risks that Lifeforce has presented are still possible in any size of flocks. And what numbers are we looking at? It could easily be 10,000 chickens and that is a substantial city flock.

It would not decrease greenhouse gas emissions from transportation because there will be more associated transport with raising chickens.

The City of Halifax recently stated that there are “nuisances and conflicts”. Their staff report recommended taking no action to change long standing bylaws banning urban livestock/chickens that are deemed to be in the interest of the public.

As part of Vancouver’s Greenest City Action Team we should be promoting eating healthy veggies not chickens products. We must decrease, not increase, the number of animals presently being raised and consume in order to protect people’s health, stop animal cruelty and to reduce Global Warming. Backyard chickens are not a just and sustainable food system – it would be part of the crises not the solution.

Please feel free to contact me for any details or further information.

In Respect For All Life,

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