APPENDIX G

Manitoba

Agriculture, Food
and Rural Initiatives

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Re: Urban Poultry

Mr Gordon

It is recommended that allowing the raising of poultry in urban settings, with more dense concentrations of people, other animals and pests must be done with strict bylaws and subsequent enforcement, OR not at all. The key reasons and issues behind this recommendation are included below:

**I. Food Safety**

1. Chickens and other poultry are food producing animals, even those raised as pets. In North America, that distinguishes them from dogs and cats. As such chickens cannot be regulated in the same way pets are and a bylaw would need to recognize this.
2. Poultry may carry diseases that may pass to people, such as *Salmonella* Enteritidis and *Campylobacter jejuni*, among the most common food borne pathogens in Manitoba. *Salmonella* Enteritidis also may occur inside eggs were no amount of cleaning can remove the pathogen. It is why the consumption of raw eggs or raw egg products is not recommended. Any bylaw would want to at minimum recognize this.
3. Large scale chicken and egg production is tightly controlled in Manitoba. In order to participate, producers must adhere to strict on farm food safety, biosecurity and flock health programs that limit the risks of diseases such as S*almonella*. No similar coordinated programs exist for small farm flocks.
4. Owners of small poultry flocks will be giving away or attempting to sell food stuffs; even a small flock of 3 hens would average 15 to 20 eggs a week. Most families would not consume this much and would need to get rid of them. The sale of poultry and poultry products from the "farm gate" is regulated provincially, but it is not clear if urban poultry producers would meet the standards of these regulations. If not, allowing urban poultry production without sufficient control may promote an uncontrolled, unregulated and potentially unsafe food source.

**II. Animal Health**

1. Poultry feed, poultry housing and poultry manure are strong attractants to many pests, such as flies, mice, rats, skunks and raccoons. Pets, such as cats and dogs tend to deter pests. Raising poultry has the opposite effect and requires intensive biosecurity actions to control pests, even for small flocks.
2. Poultry manure and poultry carcasses also pose a significant health and environmental risk. Composting and using the compost onsite is likely not an effective or safe way to handle poultry waste. At very least, it may be the significant restricting factor for the number of birds on any given site. Manure storage and composting may also violate certain environmental acts and regulations under Manitoba Conservation and Water Stewardship (further discussions with this department would be required). A bylaw would at minimum require owners to have a specific plan for handling poultry waste, including the maximum number of birds the plan could handle.
3. The majority of small farm flocks occur in rural areas with significant distance between them. This distance forms a partially effective barrier to disease transmission between flocks. This natural distance would not exist in an urban setting, so any bylaw would need to consider limiting both the number of birds AND the number of flocks in a given area.
4. Many areas within the City of Winnipeg attract a large number of wild water fowl from the Mississippi Flyway. While the risks are likely low, contact between wild water fowl and urban poultry creates an opportunity for the transmission of diseases, such as Avian Influenza. Any bylaw may want to restrict urban poultry in a buffer around retention ponds and other areas where wild water fowl are known to congregate.
5. It is a common practice for owners of small flocks to trade or replace mature birds as needed. Many animal disease investigations involving small flocks in Manitoba have identified this practice as the most significant means by which a disease (including those that may also infect people) was transmitted between flocks. Knowledgeable small flock owners either; (a) do not allow any new introductions until all the birds in the existing flock are removed or (b) segregate their flocks into groups and do not allow any new introductions into the segregated groups. As noted above, limiting disease introduction is even more important in concentrated urban environments. Segregation on smaller urban properties would be practically impossible, so a bylaw may want to restrict any new introductions to an existing flock.
6. For management of any significant animal disease or food safety event, it is important to be able to know where potential sources and risks are both for the public and for the owners of the herds or flocks. In Manitoba, all owners of poultry are required to identify their sites with MAFRI on the Premises Identification Database. Urban poultry owners would also be required to do so.
7. The Small Flock Avian Influenza program is a program offered by MAFRI where small flock owners may submit (through their local veterinarian) birds that have died for unknown reasons to Veterinary Diagnostic Services for a post mortem. However, the program is voluntary and while the laboratory costs are covered, veterinary consultation fees are at the owner`s expense. The Small flock Avian Influenza program is not sufficient for flock health monitoring.

**III. Animal Welfare**

This is perhaps the most significant issue regarding urban poultry production. The following also includes information from the BC SPCA (see attached).

1. It is likely that there is no current capacity for poultry welfare in Animal Services and animal shelters in the City of Winnipeg. Allowing urban poultry would come at significant costs to both.
2. Unlike rural Manitoba environments, there is not a ready local knowledge base for potential owners to: (a) know proper feed water and feeding practices, (b) develop expertise in adequate shelter and care, including proper handling as well as housing for cold environments, and (c)

recognize common signs of illness and injury. A bylaw would want to ensure the proper space allocation, housing construction (including heat and ventilation), and feed and water equipment for poultry was in place before allowing an owner to proceed with having poultry. Ideally the potential owner would also have to demonstrate some basic knowledge of poultry care.

3. If owners are keeping birds for egg production, they need to be prepared to deal with the birds once they stop producing. Production declines significantly after the first year and typically stops before 3 years of age. The birds may live much longer. Following the recommendation made under II. 5. above, the birds would need to then become pets with no other birds on site for egg production or be humanely euthanized.

If you have any additional questions or concerns regarding this issue, you may contact me by email or through the information provided below.

Sincerely,

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