

I wish to speak on December 8th regarding the recent amendment to the Responsible Pet Ownership bylaw as it pertains to 6-dog, off leash limit. As you may be aware, this recent amendment placed a limit on the number of dogs a person can have off leash, in a city off-leash park, at one time. Previous Council recognized that for-profit dog walkers were not engaged as stakeholders at any time in the 2-year public consultation process. Acknowledging this, previous Council voted in favor of a Motion Rising providing time to consult with for-profit dog walkers as an industry group. Council realized there was a significant cascading impact of the bylaw amendment for many Calgarians including:

- The financial impacts of the 6-dog limit on professional (for-profit) pet care providers comprised of several hundred local, small business owners. The amendment was largely introduced to create health and safety restrictions for the public as they pertain to recreational pet owners.
- The 6-dog limit disproportionately disenfranchises women owned businesses and employees.
- The 6-dog limit will force local business owners to change their operations to account for the loss in revenue associated with the bylaw amendment. Changes might include a drastic increase in operating costs, significant price adjustments to make up for the loss of revenue associated with the City imposed cap, and a reduction of the workforce due to the impact on financial viability resulting in job loss for Calgarians.
- The increased the cost of service in response to the 6-dog limit may make the service cost prohibitive for consumers which in turn could lead to a reduction in demand for services
- Reduced demand may lead to the dissolution of locally owned, small businesses due to the increased cost of doing business and lack of financial viability.
- The 6-dog limit will restrict the financial viability of a career in professional dog walking, limiting access to services for consumers and reduce access to jobs for Calgarians.
- Reduction in available, affordable pet care will result in increased problems for bylaw as pets who engage in regular services with professional care providers are, on a percentage basis, healthier, safer members of the community. Studies show that dogs who are well exercised and socialized are far less likely to generate barking complaints, be involved in altercations, dog bites and be found as stray animals; issues that result in animal service complaints.

Since the passing of the Motion Rising, stakeholders (for-profit dog walkers) have gathered as an industry group with the intent to work with the City's project team to;

- gain an understanding as to why the City felt the amendment was needed in the first place
- work with the City's project team to provide solutions that would address their concerns while avoiding impact to small businesses and lead to successful policy implementation
- develop a long-term working relationship with the city and bylaw services to create a positive culture surrounding pet ownership and ensure any safety issues are effectively addressed.

This is what we have learned:

- There was no public support in the 'What We Heard' Reports provided under the RPO review for a 6 dog off leash limit for dog walkers. When specifically asked about placing a limit on the number of dogs per person, only 5% supported such a regulation. In the Leger Report on page 46, the data is presented in a manner that would suggest 82% were in favor of this policy but if you look at the fine print and crunch the numbers, the support is only 5%.

- The City of Calgary RPO project team engaged many special interest groups during the RPO consultation process, but they did not engage the special interest group of dog walkers at any point during a 2-year engagement when the very essence and nature of their businesses were being impacted.
- The City of Calgary RPO project team failed to consider the impact of the 6-dog off leash limit for;
 1. hundreds of for-profit dog walking businesses,
 2. thousands of responsible pet owners in Calgary,
 3. financial interests of dog walkers and responsible pet owners
 4. hundreds of predominantly female business leaders, nor
 5. the negative behavioural consequences this will have on thousands of the city's dog population
- We confirmed that The City of Calgary's bylaw services has no data linking issues in off leash parks to for-profit dog walkers. There is no statistical data, no 311 call volumes, no man hours consumed, no volume of tickets issued attributable to dog walkers. The only information available to support this policy change is anecdotal. Anecdotal information without data cannot be measured.
- The City's bylaw service and project team proposes a permitting system for for-profit dog walkers. It suggests a different standard of requirements than exist for other pet care professionals and designations. Again, the standards they are suggesting are not based on experience or data.
- The City of Calgary broke every one of the engagements pillars it commits to during the RPO Bylaw Review as it relates to the 6-dog off leash limit.

(For further details on the information provided in our What We Learned section – please consult the attached Fact Sheet which pulls all the information relevant to for-profit dog walkers from the multiple RPO Engagement Reports and provides the report and page number associated with the data)

The only consultation that took place between the RPO Project Team and our industry group/stakeholders was a survey that was limited in the questions it asked and was quite leading. Following the results of the survey, a permitting program was proposed, and we were advised of a tight timeline to respond. We feel the survey posed questions to justify the policies being proposed under this permitting process. The survey was not an honest attempt to collaborate with our industry. There was not one opportunity for for-profit dog walkers to have an open discussion regarding the permit program that we believe, but are not certain, is being presented to this current City Council. We wholly reject this permitting proposal. It appears to us that this solution was devised well before engaging in any consultation, and the consultation was strategically conducted to prevent resistance to a predetermined outcome. This is not good faith consultation and does not conform to the tenants of consultation as outlined by The City of Calgary.

A permitting process is completely unnecessary and business prohibitive. If an incident occurs, a bylaw officer can manage the situation with the individual, and just as easily keep track of repeat offenders. A permitting program is costly to City taxpayers. Current Bylaws appropriately and equally enforced across all dog park users, including for-profit dog walkers, are sufficient to achieve the goals the city has set out to establish a safe environment in off leash areas. What the RPO public engagement clearly demonstrated was a consistent and overwhelming demand for bylaw to provide increased enforcement at the off-leash parks. If Bylaw does not have the funds in the budget to meet the needs of Calgarians, we would request that Bylaw meet with City Council to address this funding issue over bylaw reform for an issue that doesn't exist. If a lack of resources to enforce existing bylaws is the problem, then that specific issue needs to be addressed.

Bylaw services has suggested that the Chief Bylaw Officer, who we presume would have other considerable priorities and commitments, be responsible for approving hundreds of dog walking permits. We believe that it will take an inordinate amount of time to implement a permitting program. The Chief Bylaw Officer is an executive member of the City Administration, and the focus of an executive position would be on planning and strategy rather than becoming engaged in day-to-day activities. What makes even less sense is that the Chief has self-admitted to having no experience in this industry or the skills necessary to assess the skillset of a professional dog walker.

If bylaw services are checking for licensed pets at an off-leash park and find a dog walker to have unlicensed dogs with them, a ticket should be written for each unlicensed pet. The dog walker can then present the ticket to the owner. Under this approach, all members of the dog care industry are treated equally and fairly under the law and dog owners that use dog walkers to ensure they are acting as RPO are treated the same as all other municipal citizens. The instances where bylaw has been a helpful aide in reuniting any missing pets in our charge over 14 years' experience can be counted on one hand, the reality is the response times are too long and the red tape too cumbersome to be a useful tool we see any benefit in supporting beyond what is mandated. Pet owners are better off ensuring personal identification than a dog license in the City of Calgary given the limitations of bylaw responsiveness.

If the goal is safer off leash environments, it should be achieved through enforcement and the management of problem individuals in the off-leash areas. We are in full support of a broader, collaborative educational campaign (safe use) and fact-based restrictions (spay/neuter requirements) for shared off-leash spaces for all park users, not just for-profit dog walkers. The city has self-admitted there isn't enough experience or knowledge to successfully implement this program. The suggested permit creates a bottleneck at the Chief Bylaw Officer's desk.

As a community, dog walking professionals have a vested interest in maintaining clean and safe parks for their day-to-day use. Any perception that professional dog walkers are to blame for the misuse of shared public spaces is not the reality when it comes to the preservation of those parks in addition to other City resources. As a community, for-profit pet care providers are committed to working in a solutions-focused fashion with the City of Calgary bylaw department towards creating a safe and collaborative conversation that support small business and the responsible pet owning community.

The positive culture surrounding pet ownership in Calgary can be further enriched through the engagement with special interest groups to create plans that would lead to successful policy implementation. We genuinely look forward to a collaborative relationship with for-profit dog walkers and the wider pet care industry towards the development a long term, working relationship with the city and bylaw services.

We request that you as a City Councillor vote to support small businesses and responsible pet ownership and drop the 6-dog limit bylaw from the RPO amendment until such time as the City provides has data that dog walkers are in fact causing a safety issue in our communities and is willing to fully consult with our industry and provide data to support such a decision.

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Calgary RPO Bylaw Amendment Dog Walker Research Fact Sheet

SUMMARY:

There was no public support in any of the What We Heard Reports provided under the RPO review for a 6 dog off leash limit for dog walkers. When specifically asked about placing a limit on the number of dogs per person, only 5% supported such a regulation. In the Leger Report on page 46, the data is presented in a manner that would suggest 82% were in favor of this policy but if you look at the fine print and crunch the numbers, the support is only 5%.

While the City of Calgary RPO project team engaged many special interest groups during the RPO consultation process, they did not engage the special interest group of dog walkers at any point during a 2 year engagement when the very essence and nature of their businesses were being impacted.

The City of Calgary RPO project team failed to consider the impact of the 6 dog off leash limit to:

1. hundreds of dog walker businesses,
2. thousands of responsible pet owners in Calgary,
3. financial interests of dog walkers and responsible pet owners
4. hundreds of predominantly female business leaders, nor
5. the negative behavioural consequences this will have on thousands of the city's canine community

The City of Calgary has no data linking issues in off leash parks to dog walkers – there is no statistical data, no 311 call volumes, no man hours consumed, no volume of tickets issued attributable to dog walkers. The only information available to support this bylaw is anecdotal. Anecdotal information without data is hearsay.

The City of Calgary is using a permitting system to coerce dog walkers to enforce the city's dog licensing. Licensing is clearly the responsibility of Bylaw officers and no other member of the professional for profit pet care industry is being held accountable for this requirement. If a Bylaw Officer discovers a dog walker with an unlicensed dog, they can write a ticket that can then be passed along to the owner of the dog. It should be up to the dog walker to accept or reject unlicensed dogs and not something they are regulated to do.

The City of Calgary broke every single one of its engagement pillars during the RPO Bylaw Review as it relates to the 6 dog off leash limit.

FACTS:

Fact: City of Calgary does not have any data showing the number of calls made to Bylaw for dog walker complaints.

Fact: The City of Calgary did not appropriately survey or engage stakeholders in the professional for profit pet care industry prior to voting on the suggested 6 dog off leash limit as acknowledged by City Council in June 2021.

Fact: The City of Calgary failed to consider the financial impacts of the 6 dog off leash limit on professional for profit pet care providers composed of several hundred local small business owners.

Fact: The City of Calgary introduced the 6 dog off leash limit largely in response to a 500 – 600 bite issue experienced at off leash parks. The City of Calgary has no data to associate even one of those bite incidents to a dog walker(s).

Fact: The 6 dog off leash limit disproportionately disenfranchises women owned businesses and employers.

Fact: The City of Calgary did not consider the impact in service reduction and resulting increase in pet care fees that will be passed along to the citizens of Calgary resulting in a barrier to Calgarians seeking to be responsible pet owners and seek support in balancing their work and family lives.

Fact: The City of Calgary did not consider the impact of the 6 dog off leash limit on dog behavioral issues. Studies have shown that dogs who are well exercised and socialized are less likely to generate barking complaints, be involved in altercations, dog bites and be found a stray animals. This limit is creating a barrier to accessing services that will lead to increased behavioural issues.

Fact: Rescue organizations in the City of Calgary are currently operating at capacity and are pleading for help to assist them. The 6 dog off leash limit will create a barrier to much needed pet care services in the city and will exacerbate this challenging situation.

Fact: The City of Calgary indicated that they performed a peer search to determine how many cities have a bylaw limiting dog walkers and found that only 4 cities met this criterion. This means there are 285 cities with populations greater than 10,000 that do not have any numbers limits on dog walkers.

Fact: The City of Calgary established the limit of 6 in an arbitrary manner and have no data or statistics to support this value.

Fact: Inflation is a very real concern in today's economy. Many families will have a hard time making ends meet this winter especially with the increase in heating and gas costs, this 6 dog off leash limit will unnecessarily place additional upward pressure on the cost of living.

Fact: No other member of the pet care industry including breeders, groomers, pet stores or Veterinarians are being coerced to require proof of licensing prior to providing services. No other member of the pet industry is being asked to forgo revenues and decline business or care to prop up a responsibility that lies squarely on the shoulder of the City of Calgary Bylaw.

Fact: Calgarians (n=320) were asked if they felt adequate regulations were in place within off leash parks to protect the safety of people and their pets – 82% responded Yes. Of the 18% that responded No only 28% partially suggested a limit to number of dogs per person. This means only 5 percent supported a limit. (Page 46 of Responsible Pet Ownership Review of Ledger Survey) I think its important to note that the same percentage indicated more frequent monitoring of dog parks by Bylaw Officers.

Fact: Calgarians (n=758) were asked do you feel there should be regulations in place for dog walkers with respect to the number of off leash dogs under their control at once in an off leash area. 41.28% agreed there should be limits on the number of dogs per walker. 58.72 did not agree with placing a limit on the number of dogs per walker. 41.28% felt animals should be under control at all time which essentially means that the existing Bylaw meets the need of 58.72% of Calgarians. (Page 63 of Responsible Pet Ownership Review of Ledger Survey)

Fact: Calgarians (n=775) were asked if dog walkers should require a special permit. 52% of all respondents answered yes while 48% answered no. When looking at a breakdown though of pet owners vs never owned a pet (and would therefore never be impacted) only 39% of pet owners feel that dog walkers should require a special permit. The case is not overwhelming and its less overwhelming when drilling into those genuinely impacted by the need for a permit. (Page 64 of Responsible Pet Ownership Review of Ledger Survey)

Fact: Calgarians (n=672) were asked if there were any rules they thought The City should consider for professional dog walking businesses. Only 16% felt the need to consider a limit on the number of dogs per walker/ Sizes of the dogs in respect of the amount they are walking. (Page 65 of Responsible Pet Ownership Review of Ledger Survey)

Fact: Phase One – What We Heard Report is an overview of the project, engagement activities, range of in put received and the themes that were raised in phase one. The list of stakeholders is providers includes dog walker but dog walkers were not engaged in the project either directly by specific request or indirectly through appropriate general notification. The project team can not name the off leash park, if any, that signage was provided to create awareness of the Bylaw review and its impact to the industry group. (Page 4 of Responsible Pet Ownership Bylaw What We Heard Report Phase One)

Fact: Much of the engagement occurred during Covid at a time when many Calgarians were focussed on critical life sustaining matters.

Fact: Phase One – What We Heard Report under What We Heard From Public on Expectations of dog-walking businesses:

1. Employees of dog-walking businesses should be in control of dogs in their care and have proper resources to care for dogs in their care (existing bylaw)
2. Individual dog walkers should be in control of dog(s) in their care and picking up feces (existing bylaw)

There is no mention of limits on dog walkers. (Page 10/11 of Responsible Pet Ownership Bylaw What We Heard Report Phase One)

Fact: Phase One – What We Heard Report under What We Heard From City Staff on Expectations of dog-walking businesses:

1. Be licensed as a business (this is a matter for City of Calgary Business Licensing department not RPO Bylaw)
2. Be Qualified/training to do the job (there is no standardized program or even a course therefore not feasible)
3. Limit on the number of dogs they are allowed to walk on-leash at once (unreasonable and without merit)
4. Limit on the number of dogs they are allowed to walk off-leash at once
5. Have a permit or identification on them (All members of the public are required to carry ID and a drivers license should be a sufficient form of ID)
6. Restrictions on where they are allowed to walk multiple dogs (Is there sufficient available land available to dedicate to dog walkers?)
7. Ensure dogs are licensed and wearing their licensed tag (this is a City of Calgary Bylaw responsibility – if a dog walker has an unlicensed dog with them, they should be given a ticket)
8. Other

This is the only area in all the reports that lends support to limits on dog walkers. It might seem appropriate that the support for the imposition of limits come internally as they would/should have the most experience. However, their position should be supported by data that indicates that dog walkers are causing an unusual number of 311 service calls, or increased number of bylaw officer man hours or management number of incidents. Unfortunately, this data does not exist. There is no evidence that would support an imposition of a bylaw that would negatively impact the successful operation of hundreds of businesses across this city and limit the availability of critical services to responsible pet owners. This internal voice is drowning out the will of the people without any supporting data to prove that it is needed or helpful. (Page 68 of Responsible Pet Ownership Bylaw What We Heard Report Phase One)

Fact: Phase Two – What We Heard Report lists a range in inputs and received and themes raised in Phase Two. “This engagement focussed on reaching different stakeholders, City staff and pet industry representatives. The report itself states “While this report speaks specifically to engagement, the overall review process has inputs from four distinct pillars.

1. Engagement is a ‘purposeful dialogue between The City and citizens and stakeholders to gather meaningful information to influence decision making’. Engagement helps ensure that all voices are heard and considered when making decisions that impact others. Additional details on engagement can be found in the engagement overview.

Its clear that this first pillar was not upheld in any part of the engagement as the very industry group that was impacted by the 6 dog off leash limit was not engaged at any point during the 2 year project. (Page 4 of Responsible Pet Ownership Bylaw What We Heard Report Phase Two)

Fact: Phase Two – What We Heard Report lists a range in inputs and received and themes raised in Phase Two. “This engagement focussed on reaching different stakeholders, City staff and pet industry representatives. The report itself states “While this report speaks specifically to engagement, the overall review process has inputs from four distinct pillars.

2. Corporate Research was conducted in 2020 through a telephone survey and focus groups and provides statistically valid data from a representative sample of Calgarians.

The Corporate Research conducted that relates to the 6 dog off leash limit is outlined in this fact sheet about. There was no statistically relevant data collected that supported the 6 dog off leash

limit. This second pillar was not upheld. (Page 4 of Responsible Pet Ownership Bylaw What We Heard Report Phase Two)

Fact: Phase Two – What We Heard Report lists a range in inputs and received and themes raised in Phase Two. “This engagement focussed on reaching different stakeholders, City staff and pet industry representatives. The report itself states “While this report speaks specifically to engagement, the overall review process has inputs from four distinct pillars.

3. A municipal scan looked at the pet bylaws of 33 municipalities across Canada for trend and emerging practices.

This scan yielded 4 other municipalities that have implemented a limit to the number of dogs a dog walker can walk. This is not overwhelming evidence of wide support for such a bylaw. Essentially that means that 29 municipalities have not implemented such a bylaw. This municipal scan provides evidence that a bylaw of this nature is an exception not the rule and not widely supported across Canada or even Alberta. (Page 4 of Responsible Pet Ownership Bylaw What We Heard Report Phase Two)

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4. Policies and other legislation, including the Municipal Government Act (MGA) were considered in terms of how they affect the Responsible Pet Ownership Bylaw. Internal statistics include information from 311 service requests, cat and dog licensing data and bylaw violations and their outcomes.

By their own admittance, neither The City of Calgary nor Bylaw combined or in part have any data or statistics from 311 service requests to indicate any volume of calls, man hours or volume of incidents attributable to dog walker or dog walker complaints. We have repeated made requests for any type of data that would provide us with an understanding of the issue or burden on bylaw from the dog walking industry and have been told there is no such data. This final pillar does not provide any support for a bylaw change directed at dog walkers. (Page 4 of Responsible Pet Ownership Bylaw What We Heard Report Phase Two)

Fact: The engagement overview displays how data from the engagement, corporate research, municipal scans and City policies and internal statistics formulate the input that then drives Bylaw amendments that are proposed to City council. There is no evidence, statistical data or supporting input provided in any of the engagement reports that would drive a change to bylaw as it relates to Calgary’s dog walkers. In fact the issue of limiting the number of dogs per dog walker is not mentioned anywhere in the overview of topics in this Phase Two – What We Heard Report. There is a section on limiting the number of dogs per household but nothing on dog walkers. And yet we see the following changes driven into change on page 56 by an internal stakeholder under the topic of Pet Limits as an area to improve: Focus pet limits on the number of dogs that a dog walker can walk at one time. Again, this is listed as an area to improve and the resultant outcome is “Do not add a pet limit to the bylaw”. Yet, this still was included in the RPO Bylaw Changes presented to City Council in June of 2021 (Page 56 of Responsible Pet Ownership Bylaw What We Heard Report Phase Two)