



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Wildlife Policy Section  
Public Input Coordinator  
Ministry of Natural Resources  
300 Water Street  
P.O. Box 7000  
Peterborough, Ontario  
K9J 8M5

RE: EBR Registry #011-7663 - Modernization of Approvals - proposed regulatory amendments to 5 regulations to update requirements for approvals for various fish and wildlife-related activities under the Fish and Wildlife Conservation Act.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

The impacts from wildlife on farmers is well documented in the May 2009 George Morris Centre paper, An Economic Update of the Wildlife Impact Assessment for Ontario Agriculture<sup>1</sup>. That paper estimated the annual impact on farmers, from wildlife damage to both crops and livestock at \$40.9 million. Of that total, approximately \$1.5 million was for livestock and poultry losses to predation, leaving the balance of almost \$39.5 million for crop losses. For many Ontario farmers, these losses are unsustainable. However, the implementation of these proposed regulatory and administrative improvements will assist farmers by reducing the regulatory barriers to better mitigation of human-wildlife conflicts.

The OFA has focused its comments on this broad-based initiative to modernize approvals to only those specific proposals that have direct impacts on day-to-day farming-related activities. Therefore, we have not commented on item 3, Proposed Regulatory Amendments related to Possession, Buying or Selling Wildlife or item 4, Proposed Regulatory Amendments related to Wildlife in Captivity.

**1. Proposed Regulatory Amendments related to Hunting:**

- **Residence License to Hunt Raccoon at Night:**

The OFA supports the proposal to no longer require residents to obtain a Resident's License to

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<sup>1</sup><http://www.georgemorris.org/publications/file.aspx?id=851dd56e-3218-4ba8-afb2-38c43322da9f>

Hunt Raccoon at Night. Such a license appears redundant given the other requirements of possessing a valid Outdoors Card (Hunting Version) plus having a Small Game License.

- **License to Chase Raccoon at Night or Fox, Coyote, and Wolf during the Day:**

Given the crop damage attributed to raccoons combined with the livestock losses attributed to coyotes and wolves, the OFA supports this proposal to no longer require residents to obtain a License to Chase Raccoon at Night or Fox, Coyote or Wolf During the Day. Such a license appears to be redundant given the other requirements of possessing a valid Outdoors Card (Hunting Version) plus having a Small Game License.

**2. Proposed Regulatory Amendments related to Protection of Property:**

- **Protection of Property Authorizations:**

The OFA wholeheartedly supports the addition of licensed hunters to the current list of agents who can assist property owners with problem wildlife. We believe that this addition is long overdue.

- **Authorization to Hunt/Trap for Hire or Employ for that Purpose:**

The OFA supports the proposal to remove the requirement for municipalities to obtain MNR approval to hire or employ hunters or trappers to help resolve human-wildlife conflicts. We know that only a hand full of Ontario municipalities utilize option that assists livestock producers through the targeted removal of coyotes responsible for livestock predation. Through the removal of this requirement, we hope that more Ontario municipalities utilize this option.

**5. Other:**

- **Certificate of Reporting:**

The OFA supports the proposal to no longer require individuals who acquire a carcass of a black bear, white-tailed deer, American elk, moose or specially protected raptor to obtain a Certificate of Reporting.

**6. Additional OFA Recommendation:**

The OFA takes this opportunity to also make an additional "modernization of approvals" recommendation pertaining to authorizations issued to farmers under the Policy for Protecting Agricultural Property from Elk (WiIPo.3.2.6).

Between 1998 and 2001, the Ministry of Natural Resources released a total of 443 elk, obtained from Elk Island National Park, at four locations in Ontario; Lake Huron North Shore, Haliburton Highlands, Nipissing French River and Lake-of-the-Woods. In two of the release areas, increasing herds of elk came into conflict with pre-existing farm operations. They damaged farm fences, stored feed and standing crops. Finally, in 2011, the Ministry of Natural Resources implemented its Policy for Protecting Agricultural Property from Elk, whereby farmers can obtain authorization to harass or harass and kill "problem" elk, in defense of property. Although largely modeled on the Ministry's Issuance of deer removal/harassment authorizations for agricultural damage

(WilPp.3.2.3), there are a couple of key differences that disadvantage farmers facing elk damage in comparison to farmers facing deer damage.

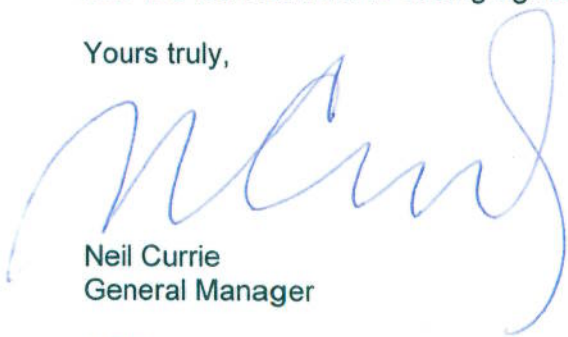
Firstly, the elk authorizations are currently issued by the Minister of Natural Resources. In contrast, the deer authorizations are issued by the local Area Supervisor or District Supervisor. Turn-around on applications for elk authorizations, according to Ministry staff, is 6-8 weeks. Contrast this with a 5-business days turnaround for Deer Removal Authorizations. The OFA views this as excessively long. Farmers tend to apply for these authorizations only when the degree of damage and loss becomes unacceptable. Taking 6-8 weeks to process one's application could easily result in receipt of the authorization long after it was of any use. The excessive time lapse in approving and issuing elk authorizations could be significantly reduced if their approval was delegated to the local Area Supervisor. The OFA recommends that approval for elk authorizations be delegated to the Area Supervisor.

Furthermore, although one can request reconsideration of denial of a "deer removal authorization", no similar review option is offered to applicants denied an elk authorization. From our perspective, there is no justification for the difference. The OFA recommends that the Policy for Protecting Agricultural Property from Elk (WilPo.3.2.6) include the option to request a review.

It has been reported that farmers in the Lake Huron North Shore area, who applied for an elk authorization received no explanation why their application was denied. To not be provided with the reason or reasons why one's application has been denied is unacceptable. The OFA believes that when an application for an elk authorization is denied, that the applicant is entitled to receive written notification of the reason or reasons.

The Ontario Federation of Agriculture welcomes the opportunity to comment on Modernization of Approvals - proposed regulatory amendments to 5 regulations to update requirements for approvals for various fish and wildlife-related activities under the Fish and Wildlife Conservation Act. We look forward to seeing agriculture's perspective reflected in the final decision.

Yours truly,



Neil Currie  
General Manager

NC/pj

cc: The Honourable Ted McMeekin, Minister of Agriculture, Food and Rural Affairs  
The Honourable Michael Gravelle, Minister of Natural Resources  
OFA Board of Directors