



Ontario Federation of Agriculture

Ontario AgriCentre

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February 21, 2014

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

Dear Coordinator:

RE: EBR Registry Number: 012-0981 Amendment to two regulations under the Fish and Wildlife Conservation Act to establish a 2 year Black Bear Pilot in parts of Northern Ontario

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 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 OFA supports biodiversity and the presence of healthy, self-sustaining wildlife populations across the Ontario landscape. We recognize that black bears are an integral and critical part of that landscape, and a part that must be maintained.

The OFA welcomes this opportunity to present its perspective on the above noted EBR posting. For Ontario farmers across Northern Ontario, human-bear conflicts go beyond threats to personal safety from marauding bears, and include losses to livestock from bear predation and damage to standing crops. In recent years, livestock and crop losses by bears have become a significant problem for Ontario farmers. We note that while Ontario farmers are eligible for compensation for losses to livestock from bear predation, provided that there remains physical evidence of the loss, there is no parallel program providing compensation for crop damage losses by bears.

While the OFA welcomes the 2 year Black Bear Pilot, we do object to some of its limitations, limitations that seem inconsistent with the intent of the pilot.

The proposed two year Black Bear Pilot only applies to eight Northern Ontario Wildlife Management Units (WMUs). Human-bear conflicts extend well beyond these identified WMUs. They occur across Northern Ontario and extend into Central and Southern Ontario. Limiting the area for the pilot discriminates against Ontarians who live and farm outside of the eight specific Northern Ontario WMUs.

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The OFA recommends that the area for the Pilot be expanded to include all WMUs north of the French and Mattawa Rivers. We do not understand why WMUs in Parry Sound, Muskoka and Haliburton Districts, where the incidence of human-bear conflicts are also high, have been left out of the pilot.

The pilot is proposed to cover two years. The OFA supports this period. A two year pilot would seem to offer sufficient time to gather and analyze program data, with the expectation that the pilot will undergo a thorough and comprehensive review immediately following the conclusion of the 2015 early season bear hunt. This review should be timed to enable a continuation of an early season hunt beyond 2015.

The Pilot proposes the early season hunt run from May 1 through June 15. We have no objections to the time period, but we do note that this is a shorter period than the previous spring bear hunt.

We oppose the combined limit of one bear per year, for hunters participating in either the early season or the fall hunt. If the objective of the early season pilot hunt is to reduce human-bear conflicts, and improve public safety, then we fail to see how this will be achieved with a one bear limit. Potential hunters are forced to choose between the early season hunt and the traditional Fall hunt. This provision may bar potential fall bear hunters, who hunt bear along with moose. The OFA recommends that hunters who harvest a bear in the early season hunt be offered a second bear seal for use in the Fall.

Lastly, we question the limitation for this pilot to Ontario residents only. A key aspect of the former spring hunt was the economic benefit to outfitters and guides from non-resident hunters. Nothing in the interim has replaced that lost income. The objectives of the early season pilot hunt to reduce human-bear conflicts and improve public safety will not be compromised by including non-resident hunters. The OFA recommends that the pilot be open to non-resident hunters to capitalize on the economic opportunity.

On behalf of OFA's 37,000 farm family businesses across Ontario, I thank you for considering our perspective on this subject.

Yours truly,



Mark Wales
President

cc: OFA Board of Directors
Ontario Federation of Anglers and Hunters
Rural Ontario Municipalities Association