



Ontario Federation of Agriculture

Ontario AgriCentre

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Public Input Coordinator
Wildlife Section
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario
K9J 8M5

To Whom It May Concern;

RE: EBR Registry 012-4735; Amendments to Ontario Regulation 667/98 (Trapping) made under the Fish and Wildlife Conservation Act to regulate the use of relaxing cable restraints for trapping in Ontario

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

The Ontario Federation of Agriculture welcomes this proposal to allow farmers and licensed trappers to use relaxing cable restraints to reduce livestock losses due to coyote predation. The costs to livestock producers from predation are both a financial burden, as well as compromising long-term efforts to improve one's herd or flock through selective breeding.

For use by licensed trappers and farmers:

The Ontario Federation of Agriculture does not oppose the proposed use of relaxing cable restraints by Ontario's farmers and licensed trappers. We view this as a reasonable limitation on their use.

We do recommend that the Ministry of Natural Resources and Forestry develop and deliver a short course for farmers, that would address coyote biology and behavior and how and where to effectively set relaxing cable restraints, to maximize their effectiveness, while minimizing the capture of non-target species.

For use across Ontario in areas with an open trapping season for coyote/wolf, except during deer seasons in southern, central and parts of northeastern Ontario where dogs are allowed:

The Ontario Federation of Agriculture does not oppose the proposal for a closed season in those Wildlife Management Units (WMUs) when deer hunting with dogs is allowed. We view this as a reasonable condition for the use of relaxing cable restraints.

For use in protection of property:

From the perspective of a farm organization, we see relaxing cable restraints being used by farmers solely to protect their property, namely livestock and poultry, from predation by coyotes. Livestock farmers utilize a range of tools and methods to at least minimize, if not outright eliminate, predation. Livestock producers suffer not only financially from predation, they also suffer emotionally from finding their animals killed and injured by predating wildlife.

We do, however, note with concern that map describing the area for use of relaxing cable restraints suggests that they might not be permitted in the 39 townships immediately adjacent to Algonquin Park. While hunting wolves and coyotes in those townships is prohibited, livestock farmers in those 39 townships are allowed to shoot predating wolves and coyotes, in the protection of their property, *i.e.* their livestock and/or poultry. Since the intent of allowing use of the relaxing cable restraint on Ontario farmers is to protect livestock and poultry from predating coyotes, the OFA requests that the Ministry of Natural Resources and Forestry clearly permit relaxing cable restraint, on farms, for the protection of the farmer's livestock and poultry, within the 39 townships immediately adjacent to Algonquin Park.

The Ontario Federation of Agriculture welcomes the opportunity to provide its support for use of relaxing cable restraints on Ontario farms, for protection of livestock and poultry from predating coyotes. We look forward to the Ministry of Natural Resources and Forestry's implementation of the necessary regulation changes as soon as possible.

Yours truly,



Don McCabe
President

cc: The Honourable Bill Mauro, Minister of Natural Resources and Forestry
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors