



Ontario Federation of Agriculture

Ontario AgriCentre

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Public Input Coordinator
Wildlife Section
Ministry of Natural Resources and Forestry
Natural Resources Conservation Branch
300 Water Street
Peterborough, ON
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To Whom it may concern;

RE: EBR Registry Number 012-8249, Building a Wildlife Management Strategy for Ontario: Discussion Paper

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.

Wildlife damage imposes a significant financial burden on some Ontario farmers. By "some", we mean that not all farmers suffer from wildlife predation equally. The impacts vary. Where one's farm is located and what the surrounding characteristics are playing a significant role. Similarly, farm type also reflects in overall predation losses. Based on the Ontario Soil and Crop Improvement Association's 2000 *Wildlife Impact Assessment for Ontario*, subsequently updated in 2009 by the George Morris Centre, wildlife damage to both crops and livestock amounted to \$41M in 2007, equivalent to \$47M in 2016 dollars. This 2016 inflation indexed amount does not reflect any intervening increases in crop or livestock prices. It does not reflect increasing yields from new varieties. While Ontario does compensate farmers for livestock and poultry losses attributed to wildlife under the Ontario Wildlife Damage Compensation Program (OWDCP), the program only reimburses the farmer for the value of the animal on the day it was killed. There is no compensation for any future lost production or increased value at marketing age. For fiscal year 2016, government compensation payments to farmers under the OWDCP totaled \$1,695,604. The amount of wildlife damage borne by crop producers far outweighs that incurred by livestock producers, and their "hurt" is further compounded by the reality that they have no effective compensation program for their losses parallel to the Ontario Wildlife Damage Compensation Program.

Crop insurance only triggers a payment if the farmer's yield falls below a predetermined threshold between 70% and 90% of yield. Wildlife damage losses rarely are large enough and extensive enough to trigger a payment. But they insidiously occur year after year, constantly eroding yields. Profit margins for many crops are very slim, making 10% to 30% losses devastating.

Migratory birds are an unaddressed aspect of this strategy. OFA fully understands that they are a federal responsibility under the Migratory Birds Convention Act and Regulations. Nevertheless, Canada geese and Sandhill cranes in particular, pose a significant problem for farmers as they feed on newly emerged seedlings and mature grain. Compounding this are the response limitations placed on farmers. Crucial time can pass between applying to the Canadian Wildlife Service for a permit, and the issuance of that permit. All the while, predation continues. OFA recognizes that migratory birds and the damage they inflict are beyond the scope of this discussion paper, but for Ontario farmers, they remain a difficult management challenge.

The Discussion Paper poses five questions for consideration and comment.

- 1. Which wildlife management aspects or activities (e.g. hunting, trapping, protection of property, possession, buying, selling of wildlife, wildlife health, habitat) do you believe are most important to address within a Wildlife Management Strategy for Ontario? What do you see as the key priorities for these activities?**

For Ontario's farmers, hunting, trapping and protection of property are the key management tools they rely upon to minimize predation losses, making them critical aspects within a Wildlife Management Strategy for Ontario. Farmers facing predation losses rely on hunters and trappers to assist them. Knowledge of who those local hunters or trapper are is critical. Too often, the threat is imminent; such as coyotes stalking livestock. The farmer's only option is immediate action to remove the threat.

In the past, a number of predominately rural, agriculturally-based townships were amalgamated with neighbouring urban centers. One common outcome was the universal application of municipal by-laws across both the rural and urban portions of the municipality, with no consideration of the local impacts. Too often, these amalgamated municipalities applied a "no discharge of firearms" by-law universally across the rural and urban portions of the municipality, making hunting impossible and the protection of property more difficult. Municipalities can apply their by-laws geographically. Unfortunately, they often do not pursue this option.

In that light, OFA recommends that the Ministry of Natural Resources and Forestry inform municipalities of the important role hunting, trapping and protection of property play in ensuring sustainable wildlife populations, along with the implications for farmers from universal application of "no discharge of firearms" by-laws in curtaining hunting and protection of property.

- 2. How do you think wildlife management in Ontario might need to change to respond to the trends and issues identified in Section 4?**

Adaptive management of habitats and ecosystems:

OFA views that an adaptive management system as ideal. To be effective, the Ministry of Natural Resources and Forestry will need to develop mechanisms to continuously feed in data on species, habitats and ecosystems along with the ability to continuously analyze the data, followed by the ability to alter its management plans.

Priority threats to wildlife:

Habitat loss and diseases are, in our opinion, the priority threats to wildlife. Urban expansion and population growth constantly reduce the amount of habitat available for wildlife, forcing

wildlife into adjacent habitat. In Southern Ontario, those “adjacent habitats” are most likely agricultural lands.

Ontario’s agricultural lands are a finite and diminishing resource. Less than 5% of Ontario’s area is capable of supporting agricultural activities. Between 2006 and 2011, Ontario saw its agricultural land base shrink from 13.3 million acres (2006) to 12.6 million acres (2011). That’s more than 630,000 acres over 5 years; 127,000 per year, equal to 350 acres per day. OFA attributes the majority of this to urban expansion. Urban expansion also consumes Ontario’s natural areas. The loss of natural and agricultural areas negatively affects wildlife. Habitat is lost; leading to declines in species populations, their movement into urban areas, or both. In our comments on the Co-ordinated Land Use Planning Review, we argued that Ontario should implement fixed, permanent urban boundaries as a means to preserve our agricultural land base. We point out that fixed, permanent urban boundaries would also serve to preserve Ontario’s natural areas from urban development, thereby retaining natural areas for wildlife habitat.

Wildlife diseases need to be effectively managed too. For quite some time Ontario has seen a decline in fox rabies cases. The recent outbreak of raccoon rabies underscores the need to be able to respond to changing circumstances, as these diseases not only threaten our native wildlife but also domestic pets, livestock, poultry and humans.

The human-wildlife connection:

As Ontario’s population grows, urban sprawl consumes both lands that provided habitat for wildlife and agricultural lands. This growth will inevitably result in more human-wildlife conflicts. The high numbers of raccoons, coyotes, deer, etc. found in our urban areas testifies to this.

The shift to a predominately urban-based society disconnects many Ontarians from nature. Exacerbating this disconnect has been the widespread attribution of human emotions, feelings and motives to wild animals, creating a false picture of wildlife, and making wildlife management decisions harder to communicate.

Recognition of the value of wildlife:

Different people perceive different values in wildlife. Unfortunately, too many people refuse to acknowledge that opposing views have merit. That being said, we believe many recognize the value of wildlife until they feel threatened by wildlife. In the case of urban coyotes and raccoons, once they are perceived as a threat or nuisance, urban residents want the animals removed from their geography and relocated elsewhere, with no little or consideration for the consequences of doing so.

The importance of partnerships:

Ontario is moving towards a more urbanized society, with fewer people living and working in rural communities. This demographic shift can lead to a disconnect between urban and rural, with a lack of understanding of each other’s needs, wants and their relationship with outdoor, resource-based activities and occupations. The challenge for a resource-based organization such as the Ministry of Natural Resources and Forestry will be in managing the sometimes diametrically opposed views of each.

3. Do you agree with the goals and guiding principles in Section 5? Do you have ideas for other goals or principles that could be added?

Page 23 – 4 Goals:

OFA expects all Ontarians support sustainable wildlife populations, an effective and efficient wildlife management program and wildlife policy development and management decisions informed by science and information. OFA views informed and engaged stakeholders as a laudable goal, but one we also see as a distinct challenge to achieve.

1. Sustainable wildlife populations

The Ministry of Natural Resources and Forestry needs to balance the provincial desire for abundant wildlife populations on the landscape for hunting, trapping and wildlife viewing. For farmers, wildlife populations sufficient to support hunting, trapping and wildlife viewing all too often rely upon plentiful agricultural crops, livestock and poultry as a significant source of their food requirements. From an agricultural perspective, this is not sustainable. In determining the appropriate population level to attain and maintain a sustainable wildlife population, OFA believes that the Ministry of Natural Resources and Forestry needs to exclude agricultural crops, livestock and poultry when calculating available food sources. We recognize that wildlife will utilize crops, livestock and poultry as a food source. We specifically do not want wildlife's use of crops, livestock and poultry to be considered in setting population thresholds or hunting license numbers in a particular area or Wildlife Management Unit.

2. An effective and efficient wildlife management program

An effective and efficient wildlife management program will be one that is receiving information, analyzing and assessing trends, and then altering management practices as necessary. Outcomes that demonstrate an effective and efficient wildlife management program would be minimal human-wildlife conflicts, regardless of where they occur. Human-wildlife conflicts are an indicator of a system out of balance. Government's response should be situational, not a one-size-fits-all approach. Data on species numbers, distributions, natural food supplies, population trends and threats will dictate the appropriate response.

3. Wildlife policy development and management decisions informed by science and information

We agree that wildlife policy development and management decisions must be informed by science and information. Numbers of tags offered should be based on sound data on species numbers, distributions, and population trends.

OFA firmly believes that retention of protection of property provisions, combined with access to a suite of tools, hunting, trapping, agents, traps and non-lethal snares is vital to minimizing predation losses for farmers. While farmers endeavour to act proactively to protect crops, livestock and poultry from predation, there is only so much farmers can do to deter predation. Predation will occur, and farmers require readily accessible response options. OFA also recommends streamlined access to Ministry of Natural Resources and Forestry-required authorizations to address deer and elk predation on crops.

4. Informed and engaged stakeholders

OFA views informed and engaged stakeholders as a laudable goal. However, we also see it as a distinct challenge to achieve. It necessitates a commitment, in terms of time and money, to communicate to a broad and diverse set of stakeholders, with sometimes harsh and difficult messages. Among the sometimes harsh and difficult messages are;

Predation losses incurred by farmers are a shared government responsibility. Although the Ministry of Agriculture, Food and Rural Affairs administers the current Ontario Wildlife Damage Compensation Program, which compensates farmers for livestock and poultry losses to predation, the Ministry of Natural Resources and Forestry must share in this responsibility. As the Ministry responsible for wildlife management, it is the wildlife under the Ministry's management that is responsible for the losses to crops, livestock and poultry incurred by farmers.

Messaging from the Ministry of Natural Resources and Forestry must counter the Disneyfication of wildlife.

The Ministry of Natural Resources and Forestry needs to publicize and emphasize the role of hunting and trapping in wildlife management. Hunting and trapping play an integral part of wildlife management. These activities have been a reality for generations. OFA recommends that the Ministry undertake to publicize the positive role of hunting and trapping in wildlife management

Too often when urban wildlife is seen either as a nuisance, a threat, or both, residents and municipal politicians typically advocate that these animals be relocated to the "countryside". But populations of urban coyotes, raccoons, etc. demonstrate that rural areas are already at their carrying capacity for these species, and these animals are moving into urban areas because they have no alternative. There is a solid scientific rationale for not relocating captured wildlife farther than one kilometer from its capture site. OFA recommends that the Ministry of Natural Resources and Forestry clearly address calls to relocate urban wildlife to rural areas with the scientific rationale against relocation.

The overwhelming majority of land across Southern Ontario is privately-owned farmland. Wildlife-related activities on farms (hunting, fishing, trapping, wildlife viewing) only occurs with the permission of the property owner (i.e. the farmer). No permission equals no access. The Trespass to Property Act **does not** require farmers to post their land to indicate their intentions with respect to public access. OFA recommends that the Ministry of Natural Resources and Forestry in collaboration with the Ministry of the Attorney General, publicize the provisions in the Trespass to Property Act that do not require posting agricultural properties to indicate public access is not permitted.

A number of municipalities, particularly those with a significant urban component, have adopted "no discharge of firearms" by-laws. OFA recognizes that there is a place for these by-laws. For municipalities with rural and urban areas, universal application deprives farmers of hunting as a wildlife management option. Secondly, a "no discharge of firearms" by-law jeopardizes the farmer's ability to protect his or her property from predatory wildlife by using a firearm. "No discharge of firearms" by-laws can be applied to selected geographic portions of a municipality. Unfortunately, few municipalities exercise this option. OFA recommends that the Ministry of Natural Resources and Forestry collaborate with the Ministry of Municipal Affairs to inform municipalities that they can apply their "no discharge of firearms" by-law to only the urbanized

portions of their municipality. Furthermore, we recommend that the Ministry of Natural Resources and Forestry in collaboration with the Ministry of Municipal Affairs clarify the relationship between municipal “no discharge of firearms” by-laws and use of a firearm in the protection of property.

The Ministry of Natural Resources and Forestry requires special authorizations to protect property from predation by deer and elk. We understand their reasoning, but too often the time between application and issuance is too long. OFA recommends that the Ministry streamlined access to these authorizations. Farmers deserve an approval process that can respond quickly in times of need.

Wildlife diseases; rabies, mange, distemper, are all present in some wildlife. The threats posed by them are real and significant for humans, pets, farmed animals as well as other species of wildlife. Strict adherence to the Ministry’s policies against long-distance relocation is an effective control on their spread. In addition, programs such as the Ministry’s rabies baiting program are valuable wildlife management tools.

Page 24 – 6 Guiding Principles

1. Manage at appropriate scales:

OFA does not have the requisite scientific background to advise the Ministry on the appropriate landscape scale for wildlife management.

2. Integrate and coordinate:

OFA does not have the requisite scientific background to advise the Ministry on integration and coordination for wildlife management.

3. Manage and mitigate risk:

An effective wildlife management system needs to address several potential risks or threats. Human-wildlife conflicts are exacerbated by Ontario’s growing population combined with habitat losses. Ontario’s historic pattern of unchecked urban growth and expansion cannot continue.

Wildlife diseases also need to be effectively managed. Ontario has, for quite some time, seen a decline in fox rabies cases. The recent outbreak of raccoon rabies in and around Hamilton underscores the need to be able to respond to changing circumstances, as these diseases not only threaten our native wildlife but also domestic pets, livestock, poultry and humans.

4. Facilitate adaptive management:

An adaptive management system is ideal. To be effective, the Ministry of Natural Resources and Forestry will need to develop mechanisms to continuously feed in data on species, habitats and ecosystems along with the means to continuously analyze the data its receiving, followed by the ability to alter its management plans.

5. Recognize interests and contributions of hunters and trappers:

OFA believes that hunting and trapping are key contributors to achieving Ontario's wildlife management objectives. They must be promoted and protected.

6. Recognize Aboriginal rights and interests in wildlife resources:

OFA offers no comments on this.

4. What are some actions and activities that government, organizations and individuals could take to improve wildlife management in Ontario?

OFA views the following government actions and activities as necessary to improve wildlife management in Ontario.

Recognize that predation losses incurred by farmers are a shared government responsibility, necessitating better coordination between the Ministry of Natural Resources and Forestry and the Ministry of Agriculture, Food and Rural Affairs. Furthermore, only livestock and poultry farmers are compensated for their predations losses. Crop damage by wildlife far exceeds livestock and poultry losses. This inequity must end. OFA requests that the Ministry of Natural Resources and Forestry and the Ministry of Agriculture, Food and Rural Affairs collaborate on a crop damage compensation program.

Publicize, emphasize and support the role of hunting and trapping in wildlife management.

Publicize, emphasize and support the scientific rationale for releasing captured wildlife within one kilometer of their capture site. Furthermore, the abundant urban populations of coyotes, raccoons, etc., demonstrate that Ontario's rural areas are already at their carrying capacity for these species. Wildlife species are moving into urban areas because they have no alternative habitat. The "solution" is not relocating them to rural areas. When faced with demands to relocate urban wildlife to less populated rural areas, OFA requests that the Ministry of Natural Resources and Forestry clearly and unequivocally communicate that relocation is not an option.

The overwhelming majority of land across Southern Ontario is privately-owned farmland. Wildlife-related activities on farms (hunting, fishing, trapping, wildlife viewing) only occurs with the clear permission of the property owner (i.e. the farmer). If no permission has been extended, then no access is offered. OFA also reiterates that a number of Trespass to Property Act provisions are poorly understood, particularly the provision that does not require posting a "No Trespassing" or similarly worded sign on gardens, fields or other lands under cultivation as well as lands enclosed in a manner that indicates the occupier's intention to keep persons off the premises or to keep animals on the premises.

Clarify the relationship between municipal "no discharge of firearms" by-laws and protection of property. We've been told by Ministry staff that a municipal "no discharge of firearms" by-law does not preclude the use of a firearm to protect one's property from wildlife. Nevertheless, the perception remains. OFA recommends that the Ministry of Natural Resources and Forestry, in concert with the Ministry of Municipal Affairs, clearly communicate this message to municipal governments and police.

While farmers can generally use the protection of property provisions in the Fish and Wildlife Conservation Act to address predation threats, predation on crops and stored feed by deer and

elk can only be pursued under authorizations issued by the Ministry of Natural Resources and Forestry. Current issuance of authorizations is bureaucratic and time consuming. Farmers deserve an approval process they can respond quickly in times of need. Significant losses can occur with lengthy periods between application for an authorization and receipt of it. OFA recommends the Ministry of Natural Resources and Forestry streamline access to authorizations to protect property from predation by deer and elk.

Wildlife diseases, rabies, mange, distemper, are all present in some wildlife. The threats posed are real and significant. Better communication of the rules on relocation of captured wildlife, along with better enforcement of them, would lessen the potential for disease transmission through unsanctioned wildlife relocation.

5. What do you think are the advantages of MNR moving toward wildlife management over broader areas and longer time frames? What aspects will require particular caution or attention?

From the perspective of advantages, OFA anticipates stable, sustainable wildlife populations across all of Ontario. Benefits from stable, sustainable wildlife populations include minimized human-wildlife conflicts along with reduced wildlife disease threats.

From the perspective of caution or attention, we see success of this exercise linked directly to a commitment by the Ministry of Natural Resources and Forestry to promote its Wildlife Management Strategy for Ontario, including support for the various elements of the Strategy, such as the ongoing wildlife management role of hunting and trapping.

The Ontario Federation of Agriculture appreciates this opportunity to provide its perspective on Building a Wildlife Management Strategy for Ontario: Discussion Paper. We look forward to the incorporation of our recommendations and suggestions in Ontario's Wildlife Management Strategy.

Sincerely,



Don McCabe
OFA President

DM/pj

cc: Hon. Kathryn McGarry; Minister of Natural Resources and Forestry
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors