



Ontario Federation of Agriculture

Ontario AgriCentre

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3
Tel: (519) 821-8883 • Fax: (519) 821-8810 • www.ofa.on.ca

August 22, 2016

Public Input Coordinator
Species Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario
K9J 8M5

To Whom it may concern;

RE: EBR Registry Number 012-8104 Amendments to wolf and coyote hunting and trapping seasons under the Fish and Wildlife Conservation Act in response to amendments to Ontario Regulation 230/08 (Species at Risk in Ontario List) under the Endangered Species Act, 2007 for Algonquin Wolf.

and

EBR Registry Number 012-8105 Amendment of Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) in response to changes to the Species at Risk in Ontario List.

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.

First, the 31 day timeframe for these two postings is unacceptably short. July and August are busy times for farmers. The short turnaround effectively excludes many livestock producers who farm in the areas subject to this proposed ban from submitting their comments. The Ontario Federation of Agriculture strongly urges the Ministry of Natural Resources and Forestry to extend the comment deadline for this posting for at least another 30 days to enable livestock producers who farm in the areas subject to this proposed ban the opportunity to submit their comments.

The Ontario Federation of Agriculture vehemently objects to the expansion of no hunting and no trapping zones for wolves and coyotes in the identified areas of Southern Ontario. Livestock agriculture is a key component of Ontario's agriculture sector. Predation on livestock, principally by coyotes, costs Ontario's livestock farmers. Compensation payments to livestock farmers under the Ontario Wildlife Damage Compensation Program exceeded \$1.6 million for the last fiscal year. Compensation

payments in Kawartha Lakes (adjacent to Queen Elizabeth II Wildlands) were among the highest for any municipality across Ontario, at \$129,000. For Peterborough County (adjacent to Kawartha Highlands), payments totaled \$85,500.

Compensation payments do not address the full cost of predation losses; years of planned breeding for specific genetic traits can never be replaced. Compensation only pays for the animal's value on the day it was killed; there is no consideration for lost future income, its sale value at maturity, future milk production or income from future calves/lambs born. No amount of money can ever address the emotional impacts on farmers from finding one's animals injured, killed or mutilated by predators.

Livestock producers rely upon the "protection of property" provisions in the Fish and Wildlife Conservation Act. Without them, many livestock producers, particularly in high predation areas would likely stop raising livestock. Listing the Algonquin wolf affords the wolf automatic protection not only for itself, but also its habitat. For livestock farmers, that means they cannot "harass, capture or kill" wolves and coyotes preying on their livestock. Even once the specific no hunting and no trapping zones are established, we have significant doubts about the application of the "protection of property" provisions in the Fish and Wildlife Conservation Act to Algonquin wolves and coyotes.

Provisions in Regulation 242/08 under the Endangered Species Act, 2007 speak to a farmer's ability to "harass, capture or kill" wolves and coyotes, if there is an *imminent* (emphasis added) risk to livestock. We have no idea what that means, despite questions posed to Ministry staff. Does "imminent" mean that the wolf or coyote has its jaws locked on a calf or lamb's neck? By then it's too late to take protective action. Or can a farmer act if wolves or coyotes are in the same pasture as livestock?

Furthermore, provisions in Regulation 242/08 also speak to "entering into a protection of property agreement with the Minister". Unfortunately despite asking Ministry staff, we have no idea what is involved in obtaining this agreement. How long does it take between application and issuance? Farmers cannot afford to wait weeks or months before receiving their protection of property agreement. How long are these agreements in force? Clear and concise information on the relationship between the "protection of property" provisions in the Fish and Wildlife Conservation Act and the protection provisions in the Endangered Species Act, 2007 should have been included in these postings. If the two statutes conflict with each other, we request that the Ministry consult with its stakeholders on ways and means to reconcile this conflict.

We acknowledge that there are challenges in distinguishing between Algonquin wolves and coyotes. Nevertheless, we request that the proposed hunting & trapping ban only apply to Algonquin wolves. Coyotes were responsible for the overwhelming majority of the \$1.6 million in compensation from fiscal 2015-2016. Based on Ontario Wildlife Damage Compensation Program payment data, \$1.2 million out of the total of \$1.6 million was for coyote damage.

OFA accepted the wolf/coyote hunting and trapping ban for the 42 townships surrounding Algonquin Park because it acknowledged the impacts of predation on livestock farming by retaining the ability of farmers to protect their livestock. We believe

that that provision has addressed the concerns of the region's livestock producers while also recognizing the unique relationship between the Park and the wolves.

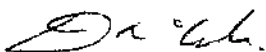
We respectfully request that the option to kill coyotes and wolves, in the course of protection of property, be retained for the 42 surrounding townships surrounding Algonquin Park along with applying this option to the townships surrounding Killarney Provincial Park, Queen Elizabeth II Wilderness and Kawartha Highlands.

At a bare minimum, these provisions should only afford species protection to the wolves. Including coyotes, a species that can easily be characterized as an invasive species, undercuts the principles and purposes of the Endangered Species Act. Coyotes are ubiquitous across southern Ontario - they're in our agricultural areas, our towns and cities and our parks. They need no protection. Their prevalence across the landscape testifies to their abundance, resilience and adaptability.

Both postings are dismissive of the economic consequences on livestock farmers. Farmers within the areas closed to hunting and trapping of wolves and coyotes will suffer substantial losses. Farmers in townships immediately adjacent to the areas closed to hunting and trapping of wolves and coyotes will also suffer increased predation, although they will retain their ability to protect their property from this predation. To help livestock farmers directly impacted by the ban on hunting and trapping of wolves and coyotes, OFA recommends that the Ministry of Natural Resources and Forestry commit to financially assisting livestock producers to erect fencing capable of excluding wolves and coyotes as well as with buying and maintaining livestock guardian dogs.

On behalf of its 36,000 farm family members, OFA looks forward to the adoption of our recommendations on these two postings to minimize their negative impacts on livestock producers in and around Algonquin Park as well as the three additional protection zones surrounding Killarney Provincial Park, Queen Elizabeth II Wilderness and Kawartha Highlands.

Yours truly,



Don McCabe
President

DM/pj

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