



Ontario Federation of Agriculture

Ontario AgriCentre

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January 27, 2017

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

To Whom It May Concern;

Re: EBR Registry Number 012-9169 A Small Game and Furbearer Management Framework for Ontario

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.

Before addressing the draft Small Game and Furbearer Management Framework for Ontario, we emphasize that there is only one Ontario landscape, meaning that the full range of landforms and land uses found across Ontario; urban, rural, agricultural, natural heritage, cultural heritage, mineral extraction, etc. must share that one landscape. Integral to this perspective is the recognition that our agricultural areas not only provide us with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians.

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 a farm is located and the characteristics of the surrounding lands play 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 amount does not reflect any intervening increases in crop or livestock prices. It does not reflect increasing yields from new crop varieties or livestock genetics. 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 are rarely large enough or sufficiently extensive 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.

OFA is very concerned by the continued loss of agricultural land to a range of non-agricultural uses; infrastructure, urban expansion as well as the restoration of natural heritage features. Based on data, the total area of Ontario farms declined dramatically by almost 260,000 ha (636,000 acres) between 2006 and 2011; from 5.4 Million ha (13.3 Million acres) to 5.1 Million ha (12.6 Million acres). That is 350 acres/day. Put in an easier to visualize form, its equivalent to 173 CFL football fields, each and every day! Keeping our agricultural lands for the production of food, fibre and fuel is critical.

Agriculture is the principle land use across Southern Ontario. There are also large areas in Northern Ontario where agriculture is the principle land use too. The Small Game and Furbearer Management Framework for Ontario totally fails to acknowledge this reality.

In the 2014 PPS, a natural heritage system is defined as “a system made up of natural heritage features and areas, and linkages intended to provide connectivity (at the regional or site level) and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. These systems can include natural heritage features and areas, federal and provincial parks and conservation reserves, other natural heritage features, lands that have been restored or have the potential to be restored to a natural state, areas that support hydrologic functions, and working landscapes that enable ecological functions to continue”. The Province has a recommended approach for identifying natural heritage systems, but municipal approaches that achieve or exceed the same objective may also be used”. The “working landscapes” referenced in the definition **includes** agricultural lands.

Objective 2: Ecological integrity

The entire Small Game and Furbearer Management Framework for Ontario ignores agriculture and the reality that agriculture is the principle land use across many Ontario municipalities. This oversight is unacceptable.

OFA has concerns with the wording of 2.3.2. We are opposed to the capture and translocation of wildlife due to the potential to introduce problem and/or predator species, or simply unnaturally adding to the number of a particular species in an area, leading to increased predation on crops and/or livestock.

The Ministry of Natural Resources and Forestry must be careful about developing an approach to capture and translocation (2.3.3). The Ministry already has a policy that mandates captured wildlife be released within 1 kilometer of their capture point. Capture and translocation can upset the balance between species numbers and food supply, leading to predation on crops and livestock. A particular concern is if the species to be captured and relocated is not present in its release area.

Objective 3: Habitat provision

The focus of Objective 3 on habitat management and enhancement, particularly in the context of Southern Ontario, overlooks the negative impacts on agriculture from increased wildlife populations, namely increased predation combined with reduced farm income. Policies and programs intended to enhance small game and furbearer populations and their habitats must also consider other land uses, and the impacts to these other land users. OFA recommends that policies and programs intended to enhance small game and furbearer populations and their habitats balance these outcomes with their impacts on agricultural operations.

Objective 4: Socio-economic benefits

OFA recognizes the benefits from small game hunting and trapping, particularly in the context of maintain wildlife populations at sustainable levels. Regrettably Objective 4 makes no mention of the necessity to obtain landowner permission before hunting, trapping or engaging in a non-consumptive activity on privately-owner lands. Many 21st century farm operations rigidly restrict access to farm fields and/or livestock to minimize unintended disease transfers. This practice is referred to as biosecurity. Furthermore, recent amendments to the Trespass to Property Act increased the maximum fine for trespassing as well as removed the monetary limit on damage awards under the Act. When promoting and developing policy for activities that may occur on privately owned lands, OFA believes that it is incumbent upon ministries and government agencies to reflect any other statutes and regulations that may impact an activity. OFA further recommends that Objective 4 be rewritten to include acknowledgement of landowner permission before hunting, trapping or engaging in a non-consumptive activity on privately-owner lands, as well as on-farm biosecurity protocols intended to minimize unintended disease transfers.

Objective 5: Communication and education

In 2015, the Ministry of Natural Resources and Forestry consulted on the use of Relaxing Cable Restraints by licensed trappers and farmers, to trap coyotes and wolves in protection of property. OFA recommended that the Ministry develop and deliver training for farmers in the effective use of Relaxing Cable Restraints along with basic information on coyote behavior and biology, to maximize their effectiveness while minimizing the capture of non-target species. As there has been no such training for farmers, we reiterate our request that the Ministry develop and deliver training for farmers in the effective use of Relaxing Cable Restraints along with basic information on coyote behavior and biology.

OFA believes that public knowledge of the need to obtain landowner permission before hunting, trapping or engaging in a non-consumptive activity on privately-owner lands is missing from this section, along with communication pieces that address the Trespass to Property Act and on-farm biosecurity.

OFA welcomes this opportunity to provide its perspective on A Small Game and Furbearer Management Framework for Ontario. Should you require any further clarification of our perspective, please do not hesitate to contact OFA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Currie', written in a cursive style.

Keith Currie
President

KC/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