



Ontario Federation of Agriculture

Ontario AgriCentre

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February 14, 2018

Public Input Coordination
SAR Recovery Section
Species Conservation Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON
K9J 8M5

To Whom It May Concern;

RE: EBR Registry No. 013-1813 Request for addition information to be considered in the development of the recovery strategy for Algonquin Wolf under the Endangered Species Act, 2007

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 Ontario Federation of Agriculture supports the principles of endangered species protection and recovery. OFA has been a member of the Ontario Biodiversity Council since its inception. Collectively, Ontarians lose when species are no longer present on the landscape. We value the role played by canid predators. We also recognize the challenges canid predators present to Ontario's livestock producers, and the financial, emotional and social impacts of livestock predation. The draft Recovery Strategy for Algonquin Wolf must balance the recovery objectives for Algonquin wolf with the needs of Ontario's livestock producers to mitigate predation losses.

Depredation on Livestock (page 13):

Given the predominate location and distribution of livestock farms, primarily cattle and sheep, across Southern Ontario, the clear majority of livestock kills are committed by coyotes. However, in areas where both wolves and coyotes are present, evidence of predation is principally the carcass of the dead lamb or calf, making it difficult to conclusively determine if the killer was a wolf or coyote. From the livestock farmer's perspective, determining conclusively if the killer of their livestock was a wolf or coyote is immaterial. Their loss is of greater importance.

While Algonquin Wolves are likely not present in some of the municipalities listed on page 13, they are present in some, and OMFRA's claim forms for wildlife damage compensation do not seek to distinguish between Algonquin Wolves and Great Lakes Wolves. The language used on page 13, "all of these areas are outside the know Algonquin wolf range" is misleading, given that OMFRA's claim forms for wildlife damage compensation do not distinguish between Algonquin

Wolves and Great Lakes Wolves. Since eligibility for compensation does not ultimately hinge on determining whether the killer was actually a wolf or coyote, it serves no value to dwell on this.

Habitat Needs (pages 18-20):

From our read of the draft Recovery Strategy, we find conflicting language on this theme. On page 18 the document states that Algonquin Wolves “are generally not restricted to a specific habitat type”. On page 20, the authors state that “Algonquin wolves are currently associated with areas with limited human presence or human activity and higher moose densities”, while on page 27 the authors note that Algonquin Wolves primarily occur “in large tracts of continuous forested habitat”. When speaking about coyotes and their habitat needs, in contrast to the needs of Algonquin Wolves, we read that coyotes thrive in human-disturbed habitats, which would include lands where agriculture is a predominate land use Which habitat characterization is true?

A read of the draft Recovery Strategy strongly suggests that the lack of available habitat, to facilitate range expansion, is a key limitation. If true, a later recommendation in the document that the province expand its protected areas to include human-disturbed habitats, is irresponsible, and destined to fail.

Limiting Factors (pages 20-21):

This section contains no mention of the lack of suitable habitat, namely “large tracts of continuous forest with limited human presence”. Without suitable habitat, where can added packs of Algonquin Wolves establish themselves? While hunting and trapping, hybridization and road mortality are limiting factors, the role of potential habitat is unacknowledged. Algonquin wolves are squeezed between Great Lakes Wolves to their north and coyotes to their south and west. Habitats dominated by coyote packs are human dominated and human altered and proven to be unsuitable for Algonquin wolves. Habitats dominated by Great Lakes Wolves are unavailable. Looking at this realistically, where is there available suitable habitat for Algonquin wolves to expand into?

The comment on page 25 by COSEWIC attributing road density in Southern Ontario preventing the recovery of Algonquin Wolves ignores the reality that significant landscape differences occur between the highly human-disturbed landscapes of Southern Ontario and the relatively undisturbed forest habitat across substantial portions of central Ontario.

Compensation (page 31):

This section is sadly deficient, and in no way represents the comments of the workshop’s agricultural organization participants with knowledge and an understanding of today’s compensation realities. The section cites statutes that were repealed years ago in favour of current statutes, and totally ignores the current Ontario Wildlife Damage Compensation Program(OWDCP), launched in 2013.

The OWDCP a federal/provincial cost share program intended to pay livestock farmers the replacement value of livestock killed by a long list of predators, including wolves and coyotes; i.e. what it would cost to replace the lamb, calf, etc. killed by a predator, with one of theoretically equal value. Compensation does not reflect lost herd genetics; nor the real value of breeding stock, arising from a predator kill. Livestock farmers recognize that no amount of compensation can replace lost herd genetics that may have taken years of selective breeding to develop. Expanding Algonquin wolf and coyote protection zones into highly modified agricultural landscapes will not benefit the recovery of the Algonquin wolf, but will exacerbate the viability of livestock farmers.

Since 2017, the OWDCP has required farmers who have submitted more than 5 claims in a calendar year to provide a “Reasonable Care Plan”, a statement of how the farmer intends to mitigate future claims, to the Ministry of Agriculture, Food and Rural Affairs. In areas where both Algonquin wolves and coyotes are protected, the option to trap or kill the specific wolves or coyotes preying on one’s livestock is off limits, leaving livestock farmers in the townships around the 4 protected park areas with no viable alternatives to mitigate future predation losses. The result is that these farmers will lose access to compensation for future claims.

Algonquin Wolf Advisory Group (page 45):

OFA supports this recovery approach, but the Algonquin Wolf Advisory Group must include farm organization representatives.

Recovery priority 6.5 on page 46 speaks to “support, through research, and funding, actions to reduce conflicts between livestock producers and the Algonquin Wolf within AWRZ”. If the proposed “best practices” are linked to the OWDCP Reasonable Care requirements and are proven, and cost-effective, then OFA endorses this recovery approach. However, the statement, “minimize cost of deterrents” is confusing. What exactly is being proposed?

Recommendation concerning the area to be considered in developing a habitat regulation (pages 50-51):

1. Algonquin Provincial Park (APP) and 40 surrounding townships
2. Currently occupied areas or likely occupied areas outside APP including Killarney Provincial Park, Kawartha Highlands Signature Site Park and Queen Elizabeth II Wildlands, plus townships surrounding them
3. former geographic townships of Mowat, Blair, McConkey, Walbridge, Brown and Wilson in WMU 47
4. areas that provide a connection between these occupied areas, particularly in Zone 1, Zone 2a and Zone 3 in Figure 5 (page 34).

OFA concurs with the draft Recovery Strategy’s recommendation to continue to protect Algonquin wolves within Algonquin Provincial Park, Killarney Provincial Park, Kawartha Highlands Signature Site Park and Queen Elizabeth II Wildlands, plus townships immediately surrounding them, as set out in the regulatory changes effective September 15, 2016. We accept that these areas constitute the core habitat of the Algonquin wolf.

OFA accepts expansion of the Algonquin Wolf Recovery Zone to include the former geographic townships of Mowat, Blair, McConkey, Walbridge, Brown and Wilson in WMU 47. To the best of our knowledge, there are no active agricultural operations within those six townships, suggesting that this area does provide the habitat requirements conducive to Algonquin Wolf recovery.

There are numerous geographic townships included within the areas comprising Zones 1, 2a and 3, that are not currently subject to the September 15, 2016 hunting and trapping ban. Taken together, they significantly expand the protected area of the Algonquin Wolf Recovery Zone. A quick scan of our membership database indicates that there are active agricultural operations within some of the townships in the three zones, not previously subject to the no hunting/no trapping ban. Since there are active agricultural operations within these townships, that tells us that the landscape is a human-modified agricultural one; not one characterised by continuous forest and with limited human presence or human activity. We believe that expecting Algonquin wolves to survive and thrive in a human-modified agricultural landscape is doomed to failure. The single reason that Algonquin wolves are not found in these areas is that these highly modified

agricultural landscapes are utterly unsuited to Algonquin wolves. Their habitat requirements are completely lacking, rendering inclusion of these areas as part of an expanded Algonquin Wolf Recovery Zone as a failure. We know of nowhere where wolves survive and thrive in highly modified agricultural landscapes with substantial human presence and substantial human activity present.

Lastly, the reference on page 51 to “areas of high human use” should also include agricultural areas. While coyotes are a reality across agricultural areas, these areas lack the characteristics and essentials to be suitable Algonquin Wolf habitat. The final version of the Algonquin wolf Recovery strategy should reflect this reality.

Sincerely,

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

Keith Currie
President

KC/pj

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