



Ontario Federation of Agriculture

Ontario AgriCentre

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May 7, 2018

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

RE: EBR Registry No. 013-2618 Revising the Ontario Wildlife Rehabilitation Study Guide and Exam

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.

Nowhere in the document do we find any acknowledgement that farms and farming activities are a major land use in rural and agricultural Ontario. Neither do we find any acknowledgement that Ontario farms are privately owned enterprises, focussed on the production of food, fibre and fuel, for use by Ontario residents and beyond. Wildlife cause significant damage to both crops and livestock. In 2013, the George Morris Centre produced "An Economic Update of the Wildlife Impact Assessment for Ontario Agriculture". That study showed that wildlife predation to both crops and livestock cost Ontario farmers almost \$41 million. Breaking that number down, approximately \$1.5 million were losses due to predation on livestock and poultry. The balance, approximately \$39.5 million were losses to a wide range of crops; field crops such as corn and soybeans, as well as damages to fruit and vegetable crops. Only losses due to predation on livestock and poultry are eligible for compensation, and that compensation only covers the cost to replace a lost lamb or calf with one of similar value. Losses to specialized breeding programs, unique herd genetics carefully nurtured over generations or even the emotional hurt from finding one's animals brutally killed by predators are not compensated for.

The interface between rehabilitated wildlife and Ontario's farmers comes when they are due to be released. OFA has only commented on Chapter 9 of Revising the Ontario Wildlife Rehabilitation Study Guide and Exam, "Release Back to the Wild".

The draft Ontario Wildlife Rehabilitation Study Guide and Exam only speaks to the release of rehabilitated wildlife "in close proximity" to its capture site. We believe this is too vague. The Wildlife Custodian Authorization conditions appended to MNR's Wildlife Rehabilitation Policy contains language that specifies that rehabilitated wildlife "shall be released as close as possible to the site of original capture up to a maximum of one kilometre away". We believe the "as close

as possible to the site of original capture up to a maximum of one kilometre away” requirements should be included in the text of Chapter 9, ideally in bold type.

Secondly, while we appreciate the reference in Chapter 9 to requiring the landowner’s permission for releases on private property, that language fails to reflect the realities of Ontario in the 21st century. Numerous property-related statutes (e.g. Trespass to Property Act, Occupiers’ Liability Act) use the term “occupier” in lieu of owner to describe whoever physically possesses the property, either owner or tenant. Many Ontario farms depend on land rented from non-farm owners as a key component of the farm’s operations. In the case of rented land, OFA believes that Chapter 9 should use the term “occupier” in place of “landowner”. A well-meaning property owner could authorize the release of rehabilitated wildlife on his/her farm property with no understanding of the negative consequences for their tenant farming the land, or their farm neighbours. For releases in agricultural areas, wildlife rehabilitators should be required to not only determine who the occupier is, and if they will accept the release of the rehabilitated wildlife, but also the prior approval neighbouring of farm property owners/occupiers should be required.

We note that chapter 5 acknowledges biosecurity, but only in the context of a rehabilitator’s facilities. However, adherence to biosecurity protocols also should be an integral component of any releases of rehabilitated wildlife on private property. From agriculture’s perspective, a range of livestock, poultry and crop diseases can be transmitted to farms on footwear, vehicle tires, etc. The Ontario Ministry of Agriculture, Food and Rural Affairs has a wealth of information about on-farm biosecurity on its website. In addition, Ministry staff can provide biosecurity training to enforcement staff who may need to access a farm, during their duties. OFA strongly recommends that on-farm biosecurity be a mandatory condition of licensing wildlife rehabilitators and referenced in the context of releases in Chapter 9.

Lastly, there are no sample exam questions in Appendix 2 of the draft Ontario Wildlife Rehabilitation Study Guide and Exam. OFA believes that sample questions should have been included at this time.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on Revising the Ontario Wildlife Rehabilitation Study Guide and Exam. We look forward to the incorporation of our recommendations and suggestions into the final version.

Sincerely,



Keith Currie
President

KC/pj

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