

September 25, 2019

Public Input Coordinator
Species Conservation Branch
Wildlife Section
300 Water Street
5th Floor
Peterborough, ON
K9J 3C7

To Whom It May Concern,

RE: Environmental Registry of Ontario (ERO) Number 019-0406 Proposed changes to wolf and coyote hunting in Northern Ontario

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

Predation poses a distinct challenge for Ontario's beef and sheep farmers. While not all beef and sheep farmers suffer predation losses equally, the impacts on those that do are significant. Not only the obvious financial loss but also the emotional consequences of finding one's animals torn apart by predators or the loss through a single predation occurrence of distinct herd or flock genetics, often carefully nurtured over years of selective breeding. Improved fencing and livestock guard dogs can help to reduce predation losses, but often hunting or trapping the specific individuals preying on livestock or poultry is the farmer's only definitive solution. Provincial regulations that unduly restrict farmers' abilities to address predators, principally coyotes, that threaten their animals serves to exacerbate the negatives of predation. Data from the Ontario Wildlife Damage Compensation programs has consistently shown that coyotes are the principal predator on livestock. Program data from the last fiscal year indicates that coyotes were responsible for 70% of the number of animals lost to predation, and for 76% of the compensation.

The Ministry of Natural Resources and Forestry, through this Environmental Registry posting, proposes several changes governing wolf and coyote hunting across Northern Ontario.

- **Eliminate tag requirements for hunting wolves and coyotes in Wildlife Management Units (WMUs) 1A, 1C, 1D, 2-10, 11A, 11B, 12-37 in northern Ontario**

OFA supports the elimination of tag requirements for hunting wolves and coyotes. In the areas of Northern Ontario where livestock farming exists and is expanding, we view this change as positive. This is an area where wolves are the predominate predator species, although not a wolf subspecies at any risk of being classified as endangered or threatened. Reliance on the Small

Game license alone to manage hunter numbers will facilitate opportunities for hunting wolves and coyotes across these Wildlife Management Units. Combined with the Ministry of Natural Resources and Forestry's universal mandatory hunter harvest reporting, this will provide valuable data to sustainably manage wolf populations across Northern Ontario for the long term.

- **Continue to require a Small Game License for the hunting of wolves and coyotes in these Wildlife Management Units**

OFA has no objections to continuing to require a Small Game License to hunt wolves and coyotes in the specified Wildlife Management Units across Northern Ontario. The license requirements are sufficient to manage hunter numbers and combined with mandatory reporting will ensure that the Ministry of Natural Resources and Forestry has the data to make science-based population decisions.

- **Maintain the existing September 15 – March 31 of the following year season for wolves in these WMUs**

OFA does not oppose maintaining the current season for hunting wolves, i.e. from September to the following March, in the above noted Wildlife Management Units across Northern Ontario.

- **Introduce an annual bag limit of 2 wolves per hunter in these WMUs**

OFA supports an annual bag limit of 2 wolves per hunter in the above noted Northern Ontario Wildlife Management Units. We believe this reflects the reality that hunters can distinguish between a wolf and a coyote, when hunting. Introducing an annual bag limit for wolves alone address the significant differences in predation impacts between wolves and coyotes. Addressing wolves and coyotes differently makes sense, particularly across the identified Wildlife Management Units where wolves are the predominate predator species. The differentiation will enable farmers, or their agents, to focus their livestock protection efforts on minimizing coyote predation on livestock since coyotes are responsible for the majority of livestock and poultry predation losses.

- **Expand the coyote season to year-round in these WMUs (consistent with southern Ontario, except for the period when small game licenses are invalid in central and northern Ontario from June 16 to August 31 each year)**

OFA supports this change. Years of livestock predation compensation data clearly indicates that coyotes are the principal predator on farmed livestock and poultry. Coyotes seem to be more opportunistic predators than wolves, and they also seem more capable of tolerating hunting than wolves. Allowing for an expanded "open season" for coyotes reflects the role of coyotes in livestock predation, acknowledges the ability of hunters to clearly distinguish between a wolf and a coyote and the coyote's ability to better tolerate hunting pressure than wolves.

- **Wolf/coyote tags and mandatory reporting will still be required for wolf/coyote hunting in Central and near Northern Ontario WMUs; 38-42, 46, 47, 48, 49, 50, 53A, 53B, 54, 55, 56, 57 and 58.**

Continuing the requirement for mandatory reporting for wolf/coyote hunting in the identified WMUs across Central and near Northern Ontario is sound. OFA supports the retention of mandatory reporting for wolf/coyote hunting.

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The Ontario Federation of Agriculture welcomes this opportunity to comment on a matter that directly impacts the viability of livestock farms throughout Central and Northern Ontario. We look forward to the timely implementation of these changes to wolf and coyote hunting in Northern Ontario.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable John Yakabuski, Minister of Natural Resources and Forestry
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors