



March 9th, 2020

Hon. Ernie Hardeman
Ministry of Agriculture, Food and Rural Affairs
11th Floor, 77 Grenville Street
Toronto, Ontario M7A 1B3

Dear Minister,

RE: Recommendations to Strengthen the Ontario Wildlife Damage Compensation Program

In January 2019, your ministry introduced new program guidelines to the Ontario Wildlife Damage Compensation Program (OWDCP). These changes corrected many of the issues that arose from previous guideline changes implemented in 2017.

While these changes represented a meaningful step in the right direction, more work is required to ensure that Ontario livestock producers are fairly compensated for losses they suffer from Ontario wildlife.

We urge you to implement these recommended changes to the OWDCP immediately, so that the program can once again fulfill its promise to Ontario livestock producers.

Summary of Recommendations

Acceptable evidence

The primary complaint livestock producers had about the program changes made in 2017 was the restrictive view of what constituted acceptable evidence and the over reliance on photos to have claims approved.

OFA/OSF/BFO were pleased that the 2019 program guidelines introduced secondary evidence to help support applications. Secondary evidence includes

1. Supporting information that help show that predation was the cause of death. These include scat, tracks, herd behaviour and the producer's predation history.
2. Factors that impact the ability to document primary evidence such as rainfall that may have washed away blood.

To ensure that all Ontario livestock producers are fairly compensated for losses they suffer from Ontario wildlife, OFA/OSF/BFO recommend that secondary evidence that help show predation was the cause of death such as **scat & tracks be considered primary evidence** when OMAFRA staff evaluates a claim.

Timeliness

All three organizations have consistently received feedback that the amount of time between discovering wildlife damage and when a producer receives compensation is too long and must be shortened. To help ensure livestock producers receive timely compensation, OFA/OSF/BFO recommend the following changes to the program guidelines.

- Shorten the amount of time, the investigator must respond from 72 hours to 36 hours. Shorten the amount of time, the investigator must provide a copy of the completed program application to the owner and municipality from 7 business days to 3 business days.
- Shorten the amount of time, OMAFRA must Provide the owner with a written decision from 30 business days to 20 business days from receiving a complete application.
- Shorten the amount of time, OMAFRA must contact the municipality to request that information be provided from 15 business days to 5 business days.
- Shorten the amount of time, OMAFRA must follow up with the municipality if the requested information is not provided from 15 business days to 5 business days.
- Requests for additional information where information is missing or incomplete on the original application should be communicated to both the applicant and the investigator. Applicant producers under the current program are not notified and risk being deemed ineligible if the investigator (or municipality) fails to provide the missing information in a timely manner.
- Allow producers a mechanism to wave their right to appeal to ensure payments are received as soon as possible.
- Allow producers the ability to submit an application themselves in the rare circumstance when an investigator is unable to perform their duties.

Preventive measures

Funding be made available, possibly through a companion program, for producers who wish to implement measures to prevent wildlife damage from occurring.

OFA/OSF/BFO support the concept of a “reasonable care plan”. Preventing losses to predators is always the preferred outcome to filing a claim for compensation.

However, many of the preventive measures such as acquiring and training livestock guardian dogs or putting up additional fencing can be very costly. In other jurisdictions, funding is provided to producers to help achieve the optimal outcome which is preventing a loss from happening in the first place.

OFA/OSF/BFO recommend that funding be made available, potentially through a separate “companion” program for producers who wish to implement measures to prevent wildlife damage from occurring.

Such activities may include:

- Acquiring and/or training of livestock guardian dogs.
- Specific fencing aimed at preventing entry of predators.
- Providing a protected birthing area.
- Noise machines, lights, and other deterrents.

Reasonable care plans

OFA/OSF/BFO take issue with the requirement of a reasonable care plan after 5 kills.

The current requirement does not consider two very important factors.

1. The size of the producer’s herd and the location of the producer’s operation and.
2. The number of predators in the area.

Producers with extremely large herds living in areas with a high volume of predators are much more likely to have multiple claims and should not be subject to the same limit as smaller producers in areas with low volume of predators.

Pedigree Premium

- Under previous iterations of the OWDCP an applicant producer could submit sales records/receipts and rationale to justify fair market value of a killed animal that exceeded the provincial average price. One of the shortcomings that industry has identified with respect to the current program is that there is no opportunity to receive a higher-than-average market price for animals with above average pedigree, even upon appeal. Using an average Ontario price provides applicant producers with below average animals more compensation than would otherwise be received through the market while at the same time providing less compensation than would otherwise be received through the market to applicant producers with above average animals.
- OMAFRA has dismissed the proposal submitted by industry that would provide an option for applicant producers to submit additional information to be considered for a pedigree premium over and above the Ontario market average. OMAFRA has further indicated that a pedigree premium could be explored in the future. Tradeoffs between program winners and losers, in that some producers receive more than they would otherwise deserve, and some receive more, and administrative simplicity have been used by OMAFRA as justifications for removing the ability to award higher-than-average market prices.

Pricing

- BFO recommends that 85% be used as the starting point for calves less than 1 month of age as opposed to the current 75%. This would better reflect the value of a lost calf. It would also help Ontario producers remain competitive with Ontario's two largest beef producing competitor provinces in Alberta and Saskatchewan

We thank you for the opportunity to bring forward these recommendations that can strengthen the Ontario Wildlife Damage Compensation Program and we look forward to working with you to ensure the program can achieve it's stated purpose of compensating producers for predation losses.

Sincerely,



Keith Currie
OFA President



Marc Carere
Chair, Ontario Sheep Farmers



Rob Lipsett
Beef Farmers of Ontario President