

July 13, 2020

Public Input Coordinator
Ministry of Natural Resources and Forestry
Fish and Wildlife Policy Branch
Wildlife Section
300 Water Street
5th Floor
Peterborough, ON K9J 3C7

To Whom it may concern;

RE: ERO #019-1407 Proposals to reduce regulatory burden within the wildlife management program

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.

From our review of Environmental Registry posting ERO 019-1407, we have determined that we will only comment on proposals two and three as only these proposed changes impact farmers.

2. Enabling persons to hold both a trapping licence and a fur dealer's licence:

OFA welcomes this proposed change to Ontario's Trapping Regulations (Regulation 667/98). Currently, without a Trapper's Licence, a farmer cannot sell the pelt or carcass of wildlife, such as coyotes, shot or trapped in protection of property. Adopting this proposed change to Regulation 667/98 will enable farmers to sell pelts or carcasses of wildlife taken in protection of property, thereby not wasting either the pelt or carcass.

3. Enabling the use of firearms at night for dispatch of trapped furbearers:

Farmers, on their own property, can trap wildlife preying on their livestock or poultry, making it necessary to be able to humanely dispatch a trapped animal. The Fish and Wildlife Conservation Act currently prohibits possessing a firearm in an area usually inhabited by wildlife during "night-time"; between one half hour after sunset to one half hour before sunrise, except when hunting raccoons. As we progress through Fall into Winter, the hours of daylight diminish, making it impossible to humanely dispatch a trapped animal should a farmer be checking their traps after sunset. Enabling farmers to humanely dispatch trapped wildlife at night-time, responsibly

addresses this situation. Furthermore, the proposed requirements that the firearm be encased and unloaded before and after dispatch and is restricted to rimfire rifles only is appropriate.

OFA fully supports adoption of proposals two and three in Environmental Registry posting ERO 019-1407, and we look forward to their early implementation.

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