

February 2nd 2024

Regional Director
Regional Operations Directorate
Canadian Wildlife Service
Environment and Climate Change Canada
4905 Dufferin Street,
Toronto ON M3H 5T4

Sent via e-mail to: MbregsReports-Rapports-Omregs@ec.gc.ca

Dear Regional Director

Re: Proposals to amend the Canadian Migratory Birds Regulations - 2024

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. OFA is passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA appreciates the thorough evaluation conducted by researchers at Environment and Climate Change Canada (ECCC), which found that the Eastern Sandhill Crane population is 62% above the population target of 60,000 set by the Sandhill Crane management plan currently in place. This dramatic increase in Sandhill Crane population, supports the need of a Sandhill Crane hunt in Ontario.

OFA would like to express our support for an establishment of a Sandhill Crane hunting season in Ontario. OFA members, particularly those in northern Ontario have long voiced the problem of significant crop damages caused by the growing population of Sandhill Cranes. We believe the proposed hunt of Sandhill Cranes must be designed to help farmers mitigate crop damage caused by Sandhill Cranes.

While OFA support's the proposed framework in principle, we have several recommendations to strengthen the framework.

For this framework to effectively help farmers mitigate crop damage caused by Sandhill Cranes, the hunt must be targeted at the Sandhill Cranes which are known to damage crops. We are pleased that the proposed hunt would be limited to farmland in the Northern and Central Wildlife Districts. Although the hunt is proposed for September, Sandhill Cranes can damage crops by eating seeds planted in fields. Therefore, OFA strongly recommends that farmers, experiencing

crop damage caused by Sandhill Cranes be permitted to defend their crops from Sandhill Cranes at any point during the year.

OFA would like to see an increase to harvest limits beyond the proposed 500-1,000 Sandhill Cranes. This harvest limit represents only 0.5%-1% of the current Eastern Sandhill Population. With the current population already 62% above population targets and growing at a rate of 4.4% per year, a higher harvest rate is needed to bring the population back to its target rates.

Given the significant crop damage and growing Sandhill Crane population, OFA suggests increasing the proposed daily and possession bag limits. Increasing these limits could more effectively contribute to managing the population of Sandhill Cranes and help mitigate crop damage. This is particularly important as we do not know how many hunters will participate in a Sandhill Crane hunt.

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While we understand the need for thorough planning, OFA recommends implementing the Sandhill Crane hunting season earlier than the proposed September 2026. An earlier start would more promptly address the urgent crop damage issues faced by farmers.

The current geographic area proposed within the framework is too narrow and would leave many farmers, particularly those in northwestern Ontario without any means to control local population levels and mitigate crop damages. OFA recommends including all Wildlife Management Units within the Northern District in the proposed hunt.

OFA has long advocated for a wildlife damage compensation program for Ontario crop producers. Unfortunately, there is still no program in place to directly compensate crop producers for damage caused by wildlife. As currently designed, available Production Insurance plans do not adequately address crop losses caused by wildlife. Claims under crop insurance are triggered when a producer's yield falls below their Average Farm Yield (AFY), which is calculated using up to 10 years of actual reported yields. Year after year crop damage caused by wildlife such as Sandhill Cranes lowers a crop producer's AFY, and so repetitive damage will not trigger a crop insurance claim in any given year. In the absence of compensation, farmers must be given the tools to mitigate the crop damage caused by wildlife, including Sandhill Cranes.

In 2021, OFA conducted a study and found that the total financial damage to Ontario crop producers caused by wildlife totaled \$215 million. In northern Ontario, the Sandhill Crane was identified as the species that caused the most damage to crops. If the Sandhill Crane population continues to grow at current rates, the already significant impact on Ontario crop producers will continue to increase. Implementing a regulated hunting season for Sandhill Cranes is a vital step to managing its population and mitigating crop damage.

OFA appreciates the consideration of potential non-target species and the commitment to ongoing monitoring and adjustment of the hunting framework. This reflects a responsible and adaptive management strategy, essential for the long-term sustainability of the crane population and the need for farmers to protect their crops.

OFA supports a Sandhill Crane hunting season in Ontario. We believe it is a necessary step towards balancing wildlife conservation with the needs of Ontario's agricultural producers, who are integral to the province's economy and food security.

Thank you for considering our views on this matter.

Sincerely,

A handwritten signature in black ink that reads "Drew Spoelstra". The signature is written in a cursive, slightly slanted style.

Drew Spoelstra
President

cc: OFA Board of Directors