

September 30, 2024

Public Input Coordinator
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Sent via email to: wildlifepolicy@ontario.ca and submitted online via the Environmental Registry of Ontario (ERO)

To Whom It May Concern:

RE: ERO 019-8896: Graduated financial penalties for failing to submit mandatory hunter reports.

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO 019-8896: Graduated financial penalties for failing to submit mandatory hunter reports. Our topline feedback is summarized below:

- **Importance of Hunting:** OFA acknowledges the important role hunting plays in controlling wildlife populations and as part of sustainable agricultural practices in the province.
- **Hunter Reports and Penalties:** OFA supports policies and programs that are evidence-based and data-driven; Data derived from hunter reports promotes sound wildlife management policies and decision-making frameworks.
- **Graduated Financial Penalties:** OFA supports graduated financial penalties for failing to submit hunter reports.
- **High Compliance:** OFA supports ensuring high compliance and reporting rates to promote effective wildlife management policies and sound decision-making.
- **Penalty Amount:** OFA recommends that the Ministry ensure that the proposed new \$50 penalty surcharge is sufficient to meet the goal compliance rate of 95%, but not decrease hunting participation by being cost-prohibitive.
- **Target Compliance Rate:** OFA recommends that the Ministry ensure that a target goal of 95% compliance is needed and would be beneficial to effective wildlife management compared to already high compliance rate of 90%.
- **Broadband Connectivity:** OFA recommends ensuring alternative reporting options remain available for those in rural and remote areas without suitable access to broadband.

OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation, and regulations administered by all levels of government. We are 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.

Wildlife can cause significant crop, livestock, and poultry damage and losses, leading to decreased productivity and economic loss for Ontario's farmers. OFA understands the importance of hunters in the Ontario landscape; Hunting is an important management tool to control wildlife and is part of sustainable agricultural practices in Ontario.

Previously, OFA supported mandatory hunter reporting and financial penalties for hunters failing to submit a hunter report. Information provided through mandatory hunter reports helps to monitor and manage wildlife populations, determine tag availability, season changes and bag limits, and helps keep ecosystems healthy. Data derived from these reports promotes effective wildlife management policies and provides a sound decision-making framework.

OFA supports ensuring high compliance and reporting rates through meaningful penalties and believes that replacing the 'prevent from purchase' penalty with an increased financial penalty will continue to support this goal. OFA does not possess the necessary data or expertise to determine whether the new \$50 surcharge for a second consecutive failure to report is appropriate or if it will provide enough incentive to improve already high compliance rates. We recommend the government ensure that the proposed new surcharge is sufficient to meet the goal of a 95% compliance rate, but not decrease hunting participation by being cost-prohibitive. OFA also supports maintaining a process to consider waiving penalties in limited, exceptional circumstances such as sudden injury, illness, or an error in the fish and wildlife licensing service.

The current 90% response rate falls short of the Ministry's current target of 95% compliance; However, there is insufficient information to suggest that 95% compliance will drastically affect the quality or impact of data derived from hunter reports compared to the current rate of 90%. OFA recommends that the Ministry ensure that a target of 95% response rates is an appropriate goal and that it will have noticeable implications on effective wildlife management.

OFA would like to reiterate that access to suitable broadband can be challenging for a significant number of Ontarians living in rural and remote regions of the province. We recommend ensuring alternative reporting options, such as in-person and by telephone remain available, to help maintain and improve compliance with mandatory hunter reports.

OFA welcomes the opportunity to present our agricultural-based perspective on graduated financial penalties when hunters fail to submit a mandatory hunter report; We believe that mandatory reporting supports responsible wildlife management in Ontario.

Sincerely,

Drew Spoelstra

Drew Spoelstra
President

cc: Ontario Federation of Anglers and Hunters
OFA Board of Directors