

January 5, 2026

Public Input Coordinator
Ministry of Natural Resources| Wildlife Section
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Submitted online through the Environmental Registry of Ontario and via email:
WildlifePolicy@ontario.ca

Re: ERO 025-0761: Proposal to update the province's black bear management approach

To Whom It May Concern,

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide an agricultural perspective on **ERO 025-0761: Proposal to update the province's black bear management approach**. Our topline feedback is summarized below:

- **One Landscape:** Ontario agriculture operates within a shared landscape that supports biodiversity. Black bears are an important component of Ontario's ecosystems and supports healthy, self-sustaining wildlife populations, balanced with the realities of working agricultural landscapes.
- **Human–Wildlife Conflict as a Management Signal:** Human–bear conflict is real and growing in agricultural regions. While not a direct proxy for population size, conflict should be recognized as an important indicator influenced by land use, habitat fragmentation, food availability, and habituation.
- **Agricultural Impacts and Compensation Gaps:** Farmers experience livestock and apiary losses from black bears, often without physical evidence required for compensation. As a result, damage is under-reported and compensation data does not fully reflect agricultural impacts.
- **Increasing Habituation and Limits of Deterrents:** Bears are increasingly habituated to human environments, reducing the effectiveness of traditional deterrents. Additional mitigation tools, research, and supports are needed to protect livestock, crops, and farm safety.

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- **Science-Based, Transparent Management:** OFA supports a population objective range framework and adaptive, evidence-based decision-making. Management must remain grounded in science and transparency.
 - **Data Limitations and Extrapolation:** Population estimates rely heavily on extrapolated data, particularly in fragmented and agricultural landscapes. OFA urges transparent communication of uncertainty and conservative application of management actions where data confidence is limited.
 - **Saugeen (Bruce) Peninsula:** The Bruce Peninsula bear population is biologically unique and isolated but increasing development and existing conflict suggest the region may be nearing its social carrying capacity. Management must consider land use pressures and avoid disproportionately burdening farmers.

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.

Ontario's agricultural sector operates within a shared landscape that supports biodiversity and wildlife. OFA recognizes the ecological role of black bears and supports the objective of maintaining healthy, self-sustaining wildlife populations. Farmers are stewards of the land; Stewardship must be supported by wildlife management policies and frameworks that reflect the realities of working agricultural landscapes, where farmers live, work, and bear the direct consequences of human-wildlife conflict.

Agriculture and Human–Wildlife Conflict

OFA emphasizes that human–wildlife conflict is a critical management consideration, particularly in agricultural and mixed-use landscapes. Human-bear conflict is a real and growing issue in agricultural and mixed-use regions across the province. Farmers are often among the first to experience the impacts of increasing wildlife presence as land use intensifies, habitats fragment, and bears become more habituated to human activity.

In agricultural regions, black bear conflict extends beyond nuisance encounters and include:

- Livestock predation and losses, including cattle, sheep, goats, and poultry;
- Losses and damage to apiaries;
- Crop damage and losses;
- Repeated incursions into farmyards and outbuildings;
- Increased habituation to human activity and food sources;

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- Safety concerns for farm families and workers.

While conflict frequency should not be used as a direct proxy for population size, it should also not be dismissed as a perception issue. Instead, human-wildlife conflict should be treated as an important management signal, particularly in regions with intensive agricultural activity. Downplaying conflict as perception-driven ignores the operational, financial, and safety impacts experienced by agricultural producers by wildlife conflict.

Agricultural Impacts and Compensation Challenges

OFA continues to hear from members experiencing significant livestock and apiary losses due to black bear activity. In many cases, bear predation results in little or no remaining physical evidence, as animals are consumed or removed from the site entirely. This creates a fundamental challenge under the Ontario Wildlife Damage Compensation Program (OWDCP), which relies heavily on visible evidence of predation. As a result:

- Legitimate agricultural losses often go uncompensated;
- Farmers are discouraged from filing claims based on previous denials;
- Reported damage data likely underrepresents the true scope of bear-related damage and agricultural impacts.

The reality is that chronic under-reporting of agricultural damage and erosion of producer confidence in the compensation system has painted a misleading picture of conflict severity, OFA cautions that compensation claims data should not be relied upon as a comprehensive indicator of agricultural impact. Without addressing these compensation gaps, policy decisions risk underestimating the burden placed on farm business and rural communities.

Increasing Habituation and Limits of Existing Deterrents

OFA members report that black bears are becoming increasingly habituated to human presence and environments, particularly in areas where agricultural land intersects with forested or fragmented habitat.

Traditional deterrents that were once effective, such as noise, lights, or basic exclusion measures such as fences, are often no longer sufficient against habituated bears, leaving producers with limited practical tools to protect livestock and infrastructure. OFA encourages the Ministry to recognize habituation as a growing management challenge and to invest in:

- Expanded research into effective deterrents;
- Additional mitigation tools and supports for farmers;
- Adaptive Bear Wise programming that reflects changing bear behaviour.

Without additional tools, policy decisions risk transferring responsibility for coexistence with wildlife disproportionately onto farmers.

Support for a Science-Based, Objective-Driven Framework

OFA supports the Ministry's move toward a population objective range-based approach to black bear management. Transparent, science-driven management is consistent with best practices in wildlife management. OFA supports:

- An adaptive management framework that avoids reactive decision-making driven by short-term fluctuations or public perception;
- Clear, predictable harvest management tools that support ecological sustainability and public trust.

Data Limitations

OFA notes that bear population estimates and objective ranges may rely heavily on extrapolated data, particularly across large, heterogeneous, and agriculturally fragmented landscapes. In these regions, extrapolation may not fully reflect local conditions or conflict pressures. OFA cautions that over-reliance on point estimates or highly extrapolated data can create misleading certainty, especially when used to trigger restrictive management actions.

OFA emphasizes the importance of:

- Transparent communication about uncertainty and confidence intervals;
- Conservative application of management tools where data limitations exist;
- Continued incorporation of local and agricultural knowledge into decision-making.

Regional Considerations: Saugeen (Bruce) Peninsula

OFA recognizes that the Saugeen (Bruce) Peninsula black bear population is biologically unique, characterized by geographic isolation, lack of immigration from other bear populations, genetic distinctiveness, and increasing habitat fragmentation.

At the same time, this region faces significant and growing social and land-use pressures, including population growth, rural residential development, expanding agricultural activity, and increased recreational use.

Based on feedback from OFA members farming in the region, there is concern that the Bruce Peninsula may already be approaching its social carrying capacity for black bears, even if ecological assessments suggest room for population growth. Human–bear conflicts are already significant and are likely to intensify as development continues.


OFA cautions that management strategies that rely primarily on harvest restrictions, without addressing broader drivers such as land use, habitat connectivity, and habituation, risk shifting the burden of coexistence disproportionately onto farmers and rural residents. Additionally, harvest-based tools alone cannot resolve the underlying issue of genetic isolation.

OFA supports the Ministry's efforts to modernize black bear management through population objective ranges and adaptive frameworks. As these guidelines are finalized and implemented, OFA encourages the Ministry to ensure that:

- Agricultural realities are fully integrated into management decisions;
- Human-wildlife conflict is recognized as a legitimate management signal;
- Compensation gaps are addressed so farmers are not left bearing uncompensated losses;
- Habituation and land-use pressures are meaningfully considered alongside population metrics;
- Management frameworks are based on science and are evidence-driven; and
- Isolated populations, such as the Saugeen (Bruce) Peninsula, are managed with both ecological caution and social realism.

OFA appreciates the opportunity to provide comments on **ERO 025-0761: Proposal to update the province's black bear management approach**. We look forward to continued engagement as this framework is refined and implemented.

Sincerely,



Drew Spoelstra
President

cc: The Honourable Mike Harris, Minister of Natural Resources
The Honourable Trevor Jones, Minister of Agriculture, Food and Agribusiness
The Honourable Lisa Thompson, Minister of Rural Affairs
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website:
<https://ofa.on.ca/resources>