

February 13, 2026

Wildlife Management and Regulatory Affairs Division  
Canadian Wildlife Service | Environment and Climate Change Canada  
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Submitted via email to: [MbregsReports-Rapports-Omregs@ec.gc.ca](mailto:MbregsReports-Rapports-Omregs@ec.gc.ca)

**Re: Consultation on proposed amendments to the Migratory Birds Regulations, 2022 for the 2026–2027 and 2027–2028 migratory game bird hunting seasons**

To Whom It May Concern,

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide comments on Environment and Climate Change Canada (ECCC)'s **Consultation on proposed amendments to the Migratory Birds Regulations, 2022 for the 2026–2027 and 2027–2028 migratory game bird hunting seasons**. Our topline feedback is summarized below:

- **General Support:** OFA supports the use of science-based, consultative regulatory processes that rely on population monitoring, harvest data, and adaptive management frameworks.
- **Canada Goose Management:** OFA supports the proposed Ontario-specific measures related to Canada Goose management as part of broader nuisance wildlife and crop damage mitigation efforts.
- **Sandhill Crane Hunting Season:** OFA supports, in principle, the establishment of a regulated Sandhill Crane hunting season in Ontario.
- **Geographic Alignment:** OFA is concerned that the proposed geographic scope of the Sandhill Crane hunt may not align with regions experiencing the most significant impacts. All Wildlife Management Units in the Northern District should be included.
- **Effective Damage-Management Tool:** OFA is concerned that the proposed 14-day September season with a daily harvest limit of one Sandhill Crane may be insufficient to influence crane behaviour or reduce crop damage. An increased harvest level and expanded hunting season is recommended.
- **“Farmland Only” Clarification:** OFA emphasizes the need for clear, practical definitions of “farmland” to ensure consistent understanding and enforcement.
- **Education, Compliance, and Monitoring:** OFA emphasizes that strong education, clear compliance requirements, and adaptive monitoring are essential to ensure a new Sandhill Crane season is effective, enforceable, and publicly defensible.

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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.

OFA has consistently engaged on migratory bird and wildlife management policies where these issues intersect with agricultural production, crop protection, biosecurity, and farm viability. OFA recognizes that expanding and shifting wildlife populations, including migratory birds, pose a growing challenge for Ontario agriculture through increased crop damage, operational disruption, and on-farm safety risks. Farmers are often among the first to experience these impacts and have a strong interest in practical, science-based management approaches that balance conservation objectives with effective tools to address nuisance wildlife and reduce agricultural losses.

OFA supports ECCC's continued use of a science-based, consultative regulatory process grounded in population monitoring, harvest data, and adaptive management frameworks. We recognize that migratory bird regulations must balance conservation objectives with social, economic, and land-use realities, including those faced by agricultural producers.

OFA further supports ECCC's acknowledgment that, in certain contexts, regulated hunting plays an important role not only in conservation, but also in managing human-wildlife conflicts, particularly where expanding or overabundant populations are causing persistent damage to crops and farmland.

OFA's comments on the consultation are focused on how the proposed regulatory changes would affect Ontario in an agricultural context, with particular attention to farm-level impacts, wildlife-crop interactions, and the practical application of nuisance wildlife management tools.

#### Canada Goose Management and Nuisance Wildlife

OFA supports the proposed Ontario-specific measures related to Canada Geese, including:

- The removal of the temporary bag-limit restriction in Wildlife Management Unit 65 during the fall season; and
- The introduction of a short February Canada Goose season in select southern Ontario Wildlife Management Units, intended to focus harvest on temperate-breeding geese and mitigate ongoing human-goose conflicts.

Ontario farmers continue to experience significant crop damage, soil compaction and contamination, and production and financial losses caused by resident and temperate-breeding Canada Geese. OFA supports the use of regulated hunting seasons as part of a broader

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nuisance-wildlife management toolbox, particularly where non-lethal deterrents have proven insufficient or impractical at scale.

OFA also supports the reinstatement of the “farmland only” restriction during the Spring Special Conservation Measures season, noting that regulatory clarity is essential for landowners, hunters, and enforcement officials alike.

#### Proposed Establishment of a Sandhill Crane Hunting Season in Ontario

OFA welcomes ECCC’s recognition that Sandhill Crane population growth and increasing crop damage warrant management consideration. OFA supports, in principle, the establishment of a regulated Sandhill Crane hunting season in the identified Northern and Central districts, as it reflects an important step toward acknowledging and addressing the on-farm impacts associated with expanding crane populations. Limiting hunting to farmland in areas where agriculture and crane habitat overlap ensures that management tools are applied where agricultural conflicts are demonstrably occurring. OFA recognizes this approach as a thoughtful and precautionary first step that balances conservation objectives with the need to provide farmers with practical tools to help manage wildlife-related crop damage.

OFA has previously advocated for the inclusion of Sandhill Cranes within a regulated hunting framework. This position reflects the significant expansion of crane populations in parts of Ontario, especially northern areas of the province, and the corresponding increase in crop damage reported by farmers, particularly in cereals, corn, and forage crops. OFA recognizes that regulated hunting can serve as an effective deterrent and avoidance tool, rather than solely as a population-reduction mechanism.

OFA acknowledges and supports several cautious elements of the proposed Sandhill Crane season, including:

- A limited 14-day season length,
- Conservative daily and possession limits of one (1) crane,
- Non-toxic shot requirements, and
- A farmland-only restriction in Northern and Central districts.

These measures demonstrate ECCC’s intent to proceed in a controlled, monitored manner while minimizing risk to non-target species. OFA recognizes that Sandhill Cranes are a long-lived species with relatively low reproductive rates, and that careful monitoring is essential to ensure long-term population sustainability. OFA supports the use of appropriate harvest monitoring and reporting mechanisms to allow ECCC to assess cumulative effects over time and adjust management measures as needed. Ongoing data collection and adaptive management are critical to maintaining both conservation outcomes and public confidence in a regulated Sandhill Crane hunting framework.

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While supportive in principle, OFA has several concerns regarding the proposed scope and effectiveness of the Sandhill Crane season as it relates to Ontario agriculture:

#### Geographic alignment with crop damage

While the introduction of a Sandhill Crane hunting season in the identified Northern and Central districts is an important step in management and mitigation, OFA is concerned that the geographic area proposed within the framework does not clearly include many areas of the province where producers report significant and recurring crop damage. The geographic scope of the proposal may not adequately align with the regions experiencing significant agricultural impacts and recommends including all Wildlife Management Units within the Northern District in the proposed hunt.

#### Effectiveness as a damage-management tool

The proposed 14-day season in September and daily harvest and possession limit of one (1) crane may be biologically appropriate but may be insufficient to meaningfully influence crane behaviour or reduce localized crop damage. Sandhill Cranes can damage crops throughout the growing season, including by feeding on newly planted seed. As a result, OFA strongly recommends that farmers experiencing crop damage be permitted to protect their crops from Sandhill Cranes at any time of year. Given the extent of crop damage and the continued population increase in Sandhill Cranes, OFA believes higher harvest levels are necessary to contribute meaningfully to population management. OFA also recommends increasing the proposed daily and possession limits to enhance the effectiveness of the hunt as both a management and deterrence tool, particularly given uncertainty around hunter participation and uptake in a new Sandhill Crane season. OFA emphasizes that, for farmers, the value of regulated hunting lies largely in its deterrent effect and contribution to broader management strategies.

#### “Farmland only” clarity and implementation

OFA recognizes that clear, enforceable rules are essential to the success of any new hunting season. Clear guidance on farmland-only restrictions, possession limits, and compliance expectations will support consistent enforcement, reduce misinterpretation, and provide certainty for landowners, hunters, and regulators alike.

OFA supports the intent of farmland-only restrictions but stresses the importance of clear, practical definitions of “farmland,” including how this applies to rotational crops, pasture and hay land, fallow or post-harvest fields, and fields adjacent to natural or conservation features. Clear guidance will be essential to avoid confusion, inconsistent enforcement, and unintended liability for landowners.

#### Education, compliance, and monitoring

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Given concerns related to species identification, compliance, and public perception, OFA strongly encourages ECCC to accompany any new Sandhill Crane hunting season with robust hunter education and identification materials, clear compliance messaging, and ongoing monitoring and reporting. These measures are essential to reduce the risk of misidentification or non-compliance, provide certainty for landowners and enforcement, and maintain public confidence in the regulatory framework. A clear commitment to adaptive management based on observed outcomes will also be critical to ensuring the season remains effective, defensible, and responsive to both conservation objectives and agricultural realities.

### Broader Considerations for Ontario Agriculture

OFA reiterates that wildlife-related crop damage represents a growing and serious challenge for Ontario farmers. Expanding wildlife populations, changing land use patterns, and climate variability are increasing interactions between agriculture and wildlife, often with limited effective management options available to producers.

OFA has long advocated for the establishment of a wildlife damage compensation program for Ontario crop producers. To date, no program exists to directly compensate farmers for crop losses caused by wildlife. As currently designed, available Production Insurance plans do not adequately address wildlife-related damage, as claims are only triggered when harvested crop yields fall below a producer's Average Farm Yield, which is calculated using up to ten years of historical yields. Repeated crop damage caused by wildlife species such as Sandhill Cranes can reduce a producer's Average Farm Yield over time, meaning ongoing losses may not trigger an insurance claim in any given year. In the absence of effective compensation mechanisms, it is essential that farmers be provided with practical tools to mitigate crop damage caused by wildlife, including Sandhill Cranes.

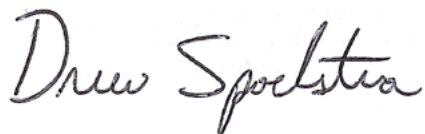
While special permits and non-lethal deterrents can play a role in managing wildlife conflicts, these tools are often reactive, limited in scope, or not consistently available to producers. A regulated hunting season, if carefully designed and monitored, can complement existing measures by contributing to population management, deterrence, and avoidance, rather than relying solely on case-by-case emergency responses.

In 2021, OFA conducted a study that estimated total wildlife-related crop damage to Ontario producers at \$215 million. In northern Ontario, Sandhill Cranes were identified as the species responsible for the greatest crop damage. If the Sandhill Crane population continues to grow at current rates, the already significant economic impact on Ontario crop producers will continue to escalate. Implementing a regulated Sandhill Crane hunting season represents a necessary and proactive step toward managing population growth and mitigating further crop damage.

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OFA supports ECCC's continued efforts to modernize and clarify the Migratory Birds Regulations and appreciates the opportunity to comment on the **Consultation on proposed amendments to the Migratory Birds Regulations, 2022 for the 2026–2027 and 2027–2028 migratory game bird hunting seasons**. OFA supports a cautious, farmland-focused approach to Sandhill Crane management that minimizes disturbance to non-target species and sensitive habitats, while providing farmers with practical tools to address crop damage. Strong education, species identification resources, and clear compliance measures will be essential to ensuring the effective and responsible implementation of any new season. OFA continues to advocate for proactive, science-based wildlife management and timely regulatory tools that reflect on-the-ground agricultural realities and looks forward to continued collaboration with ECCC to balance conservation objectives with the needs of Ontario farmers.

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>