

August 22, 2016

Wildlife Section
Public Input Coordinator
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough, Ontario
K9J 8M5

To Whom It May Concern:

RE: EBR 012-8104 – Amendments to wolf and coyote hunting and trapping seasons under the Fish and Wildlife Conservation Act in response to amendments to Ontario Regulation 23008 (Species at Risk in Ontario List) under the Endangered Species Act, 2007 for Algonquin Wolf.

On behalf of the Ontario Sheep Marketing Agency, we thank you for the opportunity to respond to the above-mentioned EBR posting.

The Ontario Sheep Marketing Agency (OSMA) is a producer organization representing 3,000 plus sheep producers who contribute over \$465 million to Ontario's economy. Established in 1985, OSMA's mission is to enhance producer returns and provide consumers with premium lamb and sheep products by encouraging Ontario sheep producers to provide quality, year-round product through advocacy, marketing development, industry capacity and organizational capacity.

OSMA strongly recommends that the Ministry of Natural Resources and Forestry (MNRF) not proceed with amendments to wolf and coyote hunting and trapping seasons under the Fish and Wildlife Conservation Act (FWCA) and, instead, move forward with a full exemption for legal hunting and trapping of Algonquin wolves under the Endangered Species Act (ESA).

In 2013, then Premier and Minister of Agriculture and Food, Kathleen Wynne challenged the agricultural sector to double its annual growth rate and create 120,000 new jobs by the year 2020. In response to this challenge, OSMA set the aggressive goal to increase the number of Ontario market lambs by 20%. Predation, however, continues to be a major issue for Ontario sheep producers, as livestock killed or injured by predators, impacts the number of market lambs available and results in significant economic losses for the industry.

From April 1, 2015 to March 31, 2016, 1,563 sheep have been injured or killed by predators in Ontario. In our current market, if those animals were able to be marketed they would have generated over \$2.3 million in economic activity for the province. Instead, the province paid out \$337,229 to sheep producers for injured or killed livestock.

It needs to be noted that the compensation amounts paid to Ontario producers tends to underestimate the real extent and cost of the problem, given that they do not include claims deemed ineligible because the carcass is missing or unreported incidences, or the fact that the current provincial compensation program fails to incorporate the replacement value of a lost animal or the carrying costs associated with maintaining an unproductive ewe as a result of a lost lamb. There is also the emotional impact on a producer of walking out to the pasture or barn yard to find animals that have been killed, mutilated and injured. The compensation values also exclude the administrative costs incurred by both OMAFRA and the municipalities to manage the program.

Banning the hunting and trapping of coyotes and wolves and eliminating the right for farmers to protect their property from predators preying on their livestock in the noted townships will increased the amount of compensation the province will have to pay to producers in these areas.

Additionally, producers have direct costs associated with predation control, such as fencing and guard animals which represent 2.6% and 6% of the current value of lambs.

OSMA recognizes that most predation in Ontario is due to coyotes and, therefore, cannot support any regulation that provides protection to a species that is not native to Ontario and is costing its members significant financial hardship and lost marketing opportunities.

Hunting and trapping can be more effective at controlling localized populations of coyotes as well as keeping them wary of humans and, therefore, away from buildings and livestock. Reducing incidences of coyote/wolf predation results in producers earning a higher return from the market place, generates an economic benefit for the provinces, and reduces the need for government compensation.

OSMA is also concerned with the potential for regulatory creep, given the precedent these amendments may have in future decisions on the classification and protection of other livestock predators, and the potential for additional townships to be included in the Algonquin Wolf's habitat zone. The economic consequences of this potential regulatory creep would be significant for the province's livestock sectors.

The most significant concern for OSMA is the proposed elimination of the right to protect one's property, guaranteed under Section 31 (1) of the *Fish and Wildlife Conservation Act, 1997*. The act states that if a person believes on reasonable grounds that wildlife is damaging or is about to damage the person's property, the person may on the person's land, harass the wildlife for the purpose of deterring it from damaging the person's property, or capture or kill the wildlife. Eliminating this basic right as a property owner is unacceptable, and in OSMA's opinion, it is in contradiction to the Government of Ontario's *Regulator's Code of Practice*, which states that the regulators should encourage economic progress when developing new regulations.

OSMA recommends that any amendments to the FWCA or the ESA must allow farmers in all wildlife management units in Ontario the right to protect their property from coyotes, wolves and other predators without restriction.

Removing a farmer's right to protect their property, in addition to banning hunting and trapping, would represent a clear failure by MNRF to balance public, social and economic interests and is something OSMA does not support.

It is disappointing that the government's proposal lacks evidence of a thorough risk assessment of multiple management options, and a clear lack of consideration or a long-term approach that balances the protection and recovery of Algonquin wolves with hunting, trapping, agriculture, and forestry activity.

In fact, we are having a challenging time reconciling the information that is available with the proposal that is presented. Ontario already has processes and mechanisms for wolf conservation in place to regulate the sustainable harvest of wolves and coyotes in Ontario. And in fact, the Committee on the Status of Species at Risk in Ontario (COSSARO) report states that, "The Algonquin Wolf population appears to be stable," and there is "no evidence of population decline" under the current management system.

We also understand that there have been harvest prohibitions in Algonquin Provincial Park and the townships surrounding the park for approximately 14 years. Prior to the implementation of these harvest bans, Algonquin wolf populations appeared to be stable or growing. Park authorities at the time further confirmed that the Algonquin wolf population appears to have remained stable for the previous 30 years. Prior to expanding harvest prohibitions to new areas of the province, it must be shown that existing harvest restrictions have generated a significant benefit to the genetic integrity and/or abundance of Algonquin wolves; **if a 14-year harvest ban has not generated a demonstrable benefit, then further restrictions are indefensible.**

Additionally, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) report states that reductions in human-caused mortality have been followed by a comparable increase in natural mortality rates, suggesting that hunting and trapping mortality was mainly compensatory. This increase in natural mortality (mange, inter-pack strife) could indicate that Algonquin wolf populations are approaching carrying capacity within the prohibition area. It also suggests that blanket harvest prohibitions have failed to contribute to Algonquin wolf recovery and will continue to do so.

While harvest restrictions may seem like the easiest management tool to propose in this case, there is no evidence to support it as the most appropriate or effective means of restoring Algonquin wolf populations. A comprehensive trade-off analysis that fully examines the costs and benefits of any proposed management solution is required.

OSMA is also interested in knowing:

- **What proof is there that Algonquin wolf is in the proposed ban areas?**
- **What are MNRF's objectives for Algonquin wolf recovery?**
- **What evidence was used to determine that hunting and trapping prohibitions will achieve these objectives?**
- **How can the MNRF propose management actions without having completed a recovery strategy?**

It must be stated that sheep producers, as first line environmentalists, take their responsibility for managing wildlife seriously, however there is a need to balance effectively balance public, social and economic interests. Additionally, as prime agricultural land increases in value, livestock agriculture will continue to be forced into more marginal agricultural areas where cropping is not viable. Given this, producers will need legal management options to manage predation if the government truly wants livestock agriculture in the province.

In closing, OSMA is recommending that the Ministry work with the agricultural community on a collaborative approach to conservation that balances environmental interests with the economic interests of the livestock industry and broader Ontario economy.

OSMA would again like to thank the Ministry of Natural Resources and Forestry for providing the opportunity to comment on proposed amendments to the *Fish and Wildlife Conservation Act, 1997* and the *Endangered Species Act, 2007*. We would be pleased to meet with you in person at your earliest convenience to discuss our comments and the proposed amendments in further detail.

Sincerely,

A handwritten signature in cursive script that reads "Robert Scott".

Robert Scott
Chairman

Cc: The Honourable Kathryn McGarry; Minister of Natural Resources and Forestry
The Honourable Jeff Leal; Minister of Agriculture, Food and Rural Affairs