

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

*Ontario Conservation Centre*

OFAH FILE: 405/794  
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Public Input Coordinator  
Ministry of Natural Resources, Wildlife Policy Section  
300 Water Street  
PO Box 7000  
Peterborough, Ontario  
K9J 8M5

To Whom It May Concern:

**Subject: EBR Registry Number 012-0981: Proposed amendment to two regulations under the Fish and Wildlife Conservation Act to establish a 2-year black bear pilot project in parts of Northern Ontario**

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit conservation-based organization, representing 100,000 members, subscribers, and supporters, and 720 member clubs. On behalf of our membership, we have reviewed EBR Proposal 012-0981 and herein submit our comments.

The OFAH is generally supportive of the proposal to reinstate an early season black bear hunt in select Wildlife Management Units (WMU) in northern Ontario. The spring bear hunt is an excellent example of sustainable development in practice, where the benefits from a renewable natural resource are maximized and the costs to society are minimized. The OFAH contends that since the cancellation of the spring bear hunt in 1999, the number of serious human-bear conflicts has increased dramatically. This increase has lowered social tolerance for bears in many areas, necessitating a return of the spring bear hunt.

Multiple North American bear researchers have concluded that optimal bear management requires a harvesting component in order to be effective (see References). The OFAH believes that this harvesting component must be split into both fall and spring seasons to maximize the beneficial impacts of a sustainable harvest. In the case of an early season bear hunt, the most obvious benefit is a reduction in bear density and a redistribution of the bear population immediately prior to the summer and fall when most bear problems occur.

While we support the proposal as a positive first step towards optimal black bear management, we have identified several shortcomings with the project. The proposed pilot project only applies to eight Wildlife Management Units in northern Ontario. Limiting the pilot project to these eight units marginalizes the bear problems experienced by the remainder of the province. Given that human-bear conflicts occur throughout bear range, **we recommend that MNR expand the early bear hunt to include all WMUs within bear range.**

As a wildlife management technique, the spring bear hunt supplies biological, social, and economic benefits. The spring hunt successfully reduced bear densities, particularly the density of male bears. This reduced cannibalism by male bears on other bears, predation on young cervids, and reduced bear problems with people. But most importantly, the hunt provided the possibility of wholesome food for the table, valuable hides, and a shared heritage with fellow hunters, family, and friends. For these reasons, we encourage the MNR to consider a full reinstatement of the spring bear hunt. With respect to the proposed pilot project, we have concerns about MNR's ability to assess its success. Given the many factors that influence the number of reports submitted to the BearWise Reporting Line (social

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tolerance for bears, population size, natural food availability, etc.), a simple examination of reporting rates will be an inadequate metric of the project's success. Furthermore, we believe that a 2-year study period is insufficient to assess the success of the project. Annual variations in weather and natural food abundance can have a substantial influence in such a short period, masking the beneficial effects of a spring harvest. **The OFAH recommends that the study period be extended beyond two years.**

We question the need to limit hunters to one bear per year. One of the mechanisms by which this project can succeed is by reducing bear densities immediately prior to the nuisance period. By limiting harvest to one bear per hunter per year, hunters will be forced to choose between the two seasons. This will only serve to re-distribute existing bear hunters and will do very little to increase harvest.

Finally, we question the exclusion of non-resident hunters. As you are aware, prior to 1999 non-residents constituted 50% of active bear hunters and were responsible for an overwhelming majority of bears harvested in the spring season. Furthermore, non-resident hunters contributed tens of millions of dollars to northern economies every year. By excluding non-resident hunters, MNR is missing an opportunity to increase the harvest of bears and to inject much-needed dollars into northern economies. **The OFAH recommends that non-resident hunters be included in the pilot project to increase the harvest of bears in the spring.**

We applaud the MNR for their recent efforts to solicit input from concerned stakeholder groups including the OFAH, Ontario Hunt Camp Association, Northwestern Ontario Sportsmens Alliance, and participating municipalities. Input from these organizations will be invaluable in determining the most appropriate way to assess success of the project.

Thank you for considering our submission on this topic.

Yours in Conservation,



Mark Ryckman

Senior Wildlife Biologist

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cc: OFAH Board of Directors  
OFAH Big Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Dr. Terry Quinney, OFAH Provincial Manager, Fish and Wildlife Services  
Greg Farrant, OFAH Manager of Government Affairs and Policy  
OFAH Fish and Wildlife Staff

**References**

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Howe, E.J., Obbard, M.E., Black, R., and L.L. Wall. 2010. Do public complaints reflect trends in human-bear conflict? *Ursus* 21(2): 131-142.