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January 3, 2005

FAX # 755-1900

Ms. Deb Stetson, Manager
Wildlife Section
Ministry of Natural Resources
5th Floor, North Tower
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Ms. Stetson:

**Subject: E.B.R. # PB04E6020 - Provincial Strategy for Wolves in Ontario
E.B.R. # RB04E6012 - Proposed Regulation Change to Enhance Wolf Conservation**

The Ontario Federation of Anglers and Hunters (O.F.A.H.) is pleased to submit the following comments on the proposed policy and regulation amendments that, together, make up the proposed provincial enhanced wolf management plan.

This submission by the Ontario Federation of Anglers and Hunters reflects the conservation interests of the 80,000 individual outdoors men and women represented by the elected O.F.A.H. Board of Directors who were engaged in the preparation of this O.F.A.H. position. Please ensure that this O.F.A.H. submission is given the due weight it therefore deserves, and is not tallied or communicated as simply "one" or "one N.G.O. @ submission to the Environmental Bill of Rights registry.

The Proposed Strategy for Wolves in Ontario

The O.F.A.H. supports the approach for enhanced wolf data collection, and adaptive wolf management for sustainable ecological and social benefits outlined in the strategy. We recognize the value of collecting harvest data from hunters, and the need to introduce a means of identifying wolf hunters for the purpose of reporting (i.e. a wolf harvest seal).

The strategy contains the elements that we expect to see in a science-based enhanced wildlife management plan, and we support the Ministry's proposed approach which, if followed, should ensure that wolves of Ontario are sustained while minimizing the impact on coyote hunters, farmers, and trappers.

We also support the strategy commitment to increase public awareness and understanding of the wolf in the ecosystem and the conservation of wolves, their prey habitat.

The Proposed Fish and Wildlife Conservation Act Amendments

While the O.F.A.H. does not believe, based on the best available data, that there is any need to restrict wolf hunting or trapping anywhere in Ontario, we do acknowledge the merit of the proposed package of regulatory changes proposed under the strategy. It is clearly desirable for the Ministry to collect total wolf harvest/mortality data from hunters and farmers to augment what is already known about trapper harvest of wolves, so that the Ministry can demonstrate and/or ensure that these activities are sustainable. (The O.F.A.H. believes that wolf populations in Ontario are not affected by hunter or trapper harvest, that wolf populations have not declined in 30 years, and that wolf populations reflect availability of prey abundance more than any other factor in central and northern Ontario.)

We believe that the wolf harvest data collection and management capabilities that are created with these proposed amendments will help the Ministry demonstrate, in the near future, that wolf hunting and trapping are fully sustainable activities in Ontario. On that basis, we generally support the proposed amendments (see below for specific comments):

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Proposed Licensing

The O.F.A.H. does not believe that there should be any limit on the number of seals made available to wolf hunters. The vast majority of wolf hunters will not purchase more than one seal, but there will be a very few who would want more than two, so why restrict the number available (to resident hunters)?

We agree with the proposed use of a seal under the existing small game license (as opposed to a new wolf hunting license). Some system of identifying who is hunting wolves, and tracking the same for the purposes of mandatory hunter reporting is necessary. What is proposed is not unduly cost prohibitive, or complicated. We view the proposed fees for resident wolf hunting seals as reasonable.

Proposed W.M.U.'s and the "Wolf/Coyote" Line

The O.F.A.H. can understand, generally, the "wolf/coyote line" delineated by the proposed W.M.U.'s above, which these proposed wolf hunting regulations would take effect. It is true that there are coyotes and wolves above this line, but we agree that there is no other or more practical means of focusing the conservation measures where they are needed (central/northern Ontario wolf range) while having the least impact on coyote hunters (southern agricultural Ontario). We understand that there is so much genetic mixing of eastern wolves and coyotes within central Ontario as to make positive identification of coyotes from wolves impossible "by sight" in this zone.

However, we do not agree that Manitoulin, St. Joseph's, and Cockburn Islands be included as "wolf range." We recommend that W.M.U.'s 43A, 43B, 44 and 45 be removed from proposed amendments.

Proposed Closed Season

The O.F.A.H. is not opposed to closing the wolf hunting season for the spring and summer (recognizing that coyote hunting in southern agricultural Ontario will still be open year-round).

However, we think that closing the hunting season on April 1 is too soon in northern Ontario in many years. It will impact wolf hunting at a time of year in northern white-tail range when deer are often very vulnerable in wintering yards, and would impact at a time in the spring when wolves can be a significant mortality factor on sheep and other livestock operations in northern Ontario.

Therefore, we recommend that the season be closed on April 30 instead of April 1 in northern Ontario W.M.U.'s, which would reflect real climate and ecological differences between northern and central Ontario.

We support keeping the summer closure of the season to September 14.

Mandatory Hunter Reporting

The O.F.A.H. supports the proposal for mandatory reporting by wolf hunters. Please involve the O.F.A.H. in discussions concerning wolf harvest and observation reporting by hunters, and be aware that the O.F.A.H. would be pleased to discuss partnerships with the Ministry for involving our members in other wolf sample/data collection programs as may be deemed necessary for enhanced wolf and wildlife management.

Yours in Conservation,

Ed Reid
Wildlife Biologist

ER/jb

cc: H. Noseworthy, Ontario Fur Managers Federation
R. Bonnett, Ontario Federation of Agriculture
O.F.A.H. Board of Directors
O.F.A.H. Big Game Advisory Committee
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