

ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Wildlife Conservation Centre

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Public Input Coordinator
Ministry of Natural Resources
Biodiversity Branch
Wildlife Policy Section
300 Water Street
PO Box 7000
Peterborough, Ontario
K9J 8M5

Dear Public Input Coordinator:

Subject: EBR Registry Number 011-6043: Amendment of Ontario Regulation 665/98 (Hunting) made under the Fish and Wildlife Conservation Act to require annual mandatory reporting of snapping turtle harvest activities

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 675 member clubs, we support the Ministry of Natural Resources (MNR) proposal to amend Ontario Regulation 665/98 (Hunting) to require annual mandatory reporting of snapping turtle harvest activities, if all necessary management components are in place.

The OFAH supports mandatory reporting of snapping turtle harvest as a component of the monitoring and assessment program that the MNR must carry out for any harvested species. In addition, mortality due to roads, habitat loss/degradation, landowner persecution, egg predation, illegal harvest and all other factors must also be investigated to provide a complete and comprehensive explanation of snapping turtle mortality risk factors. A monitoring and assessment program for snapping turtles must also include population demographic data, including abundance, geographic distribution, age-class structure and recruitment.

Collection and reporting of each of the necessary components of monitoring and assessment can provide critical information to evaluate status and population trends over time. To our knowledge there has been no attempt (despite their designation as a species of "special concern") to estimate snapping turtle abundance and distribution in the province. The Committee on the Status of Endangered Wildlife in Canada's (COSEWIC) status report actually concludes that snapping turtles are abundant and widespread in Ontario.

Snapping turtles are frequently encountered by Ontario anglers and hunters, the vast majority of whom have no interest in harvesting them; however, there are some Ontario citizens that legally harvest for personal consumption under a valid recreational fishing license.

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If the proposal does come into effect for the 2012 season, how will the MNR effectively communicate the mandatory reporting requirement?

In closing, the OFAH is committed to the long-term conservation and sustainable harvest of snapping turtles, and we are pleased to see this initial step being taken to collect important harvest information to support management decisions.

Thank you for the opportunity to provide comments and we look forward to your response.

Yours in Conservation,



Dawn Sucee
Fish and Wildlife Biologist

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cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
OFAH Sporting Dogs/Small Game Advisory Committee
Angelo Lombardo, OFAH Executive Director
Dr. Terry Quinney, OFAH Provincial Manager of Fish and Wildlife Services
Matt DeMille, OFAH Assistant Manager of Fish and Wildlife Services