

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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

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March 9, 2015

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

E-MAILED
03/09/15

Dear Sir or Madam:

SUBJECT: Amendments to Regulations Under the Fish and Wildlife Conservation Act for Moose Hunting in Northern Ontario – EBR Proposal #012-3413

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 725 member clubs. Thank you for engaging the public through the Focus Group sessions and the 2012 moose management questionnaires, and for providing the public with an opportunity to comment on proposed changes to moose seasons in northern Ontario. We respectfully submit the following comments and recommendations for your consideration.

Background

The OFAH considers moose hunting to be one of the premier hunting opportunities in the province, enjoyed by over 100,000 people annually. For many, it is a cherished opportunity for family and friends to collectively enjoy an outdoor heritage activity. As such, the OFAH seeks to ensure the protection and enhancement of the moose resource to provide optimal sustained recreational opportunities for the continued social and economic benefit of the people of Ontario.

The OFAH is a long-standing member of the provincial Big Game Management Advisory Committee and is well-versed on the recent concerns about moose population health in the province. We recognize that these declines have occurred over a lengthy period of time, and that moose declines have not occurred uniformly across northern Ontario. Importantly, we contend that the underlying causes have not been adequately identified and addressed. In June 2014, we submitted a letter to the Ministry of Natural Resources and Forestry (MNRF) outlining our concerns and recommendations, including: increased funding for moose aerial inventories; a review of WMU-specific population objectives; reinstatement of the spring bear hunt; liberalized predator hunting regulations in northern Ontario; an evaluation of habitat quantity and quality; an evaluation of white-tailed deer density in core moose range; and the establishment of a provincial moose technical committee. We are encouraged by the MNRF's commitment to examining the impact of non-hunting factors on moose populations -- the impact of predators, habitat, unregulated harvest, and diseases can no longer be ignored. The OFAH recognizes that licensed hunters have a role to play in reversing declining trends, but we have significant concerns with the proposed changes for 2015 and beyond.

General Considerations

Moose hunting is Ontario's premier big game hunting activity, generating direct and indirect economic benefits in the tens of millions of dollars annually. Conservation of the moose resource must take priority over all allocations, but management decisions cannot be made without adequately considering the socio-economic impacts of those changes. The Moose Project, and any resulting management changes, must be approached as a cost/benefit analysis. The OFAH has strived to identify and recommend management changes that will generate the greatest benefit to the resource while minimizing the impact to licensed hunting.

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In general, we are concerned about the lack of information that has been provided to the public regarding the potential impact of these proposed changes. The OFAH has benefited from the information and data that was provided in the Focus Group sessions and, can therefore, make informed decisions and recommendations. Unfortunately, the general public has not been afforded the same opportunity. The MNRF is asking the public to comment on proposed changes that will impact moose hunters across the province, without giving them the information required to make a fully informed decision. This is a significant concern due to the potential impact of these changes.

Proposed Calf Season Reduction

The OFAH supports the existing unallocated calf harvest system on the basis that in most Wildlife Management Units (WMUs) it optimizes hunting opportunities and is biologically sound and manageable under the present moose harvest planning approach. We fully recognize that many WMUs would benefit from a reduction in calf harvest, based on declining calf-cow ratios in some units. This opinion is shared by Focus Group participants and respondents to the provincial and Northeast Region Moose Harvest Management Questionnaires that were distributed in 2012. We feel that the proposed two-week calf season is an overly excessive response and is not in keeping with the spirit of adaptive management. In 2014, the MNRF sold 106,901 provincial moose licences, but only 24,360 Pool 1/Choice 1 hunters were associated with a validation tag. After accounting for a certain number of Pool 2 hunters that hunted with successful tag recipients, there are likely over 50,000 hunters who will be restricted to hunting within the same two-week period. This creates obvious concerns about increased conflicts between hunters and poor hunt quality associated with high hunter densities. A two-week season also makes it more difficult for hunters to accommodate fluctuations in weather, work schedules, and hunting preferences.

The proposed changes would also prohibit calf hunting during the bows-only season. This would limit hunting opportunities for all bowhunters, but would be particularly challenging in WMUs in northern Ontario that do not have separate tag allocations for bow and gun seasons (WMUs 27, 28, 30-33, 35, 37, and 34-42). This will make it more difficult for bowhunters to receive a tag compared to areas with a separate bow allocation. Bowhunters that are unsuccessful in the draw (and not part of a successful group) will be excluded from moose hunting entirely. This significant reduction of hunting opportunity is not justified based on the small number of calves harvested in the bows-only season (20-40 provincially each year).

Proposed Season Delay in 2016

The OFAH has serious concerns about the proposed season delay for 2016. Despite our participation on the Big Game Management Advisory Committee and the Moose Project Focus Group sessions, we have not seen any evidence to suggest that the current timing of the gun hunt is adversely impacting moose populations in northern Ontario.

Delaying the start of the moose hunting season is described in the *Moose Harvest Management Guidelines* as a potential means of reducing tag filling rates by moving the hunt further from the peak of the rut. The Guidelines describe this option as “a cautious attempt to address” warm weather and high rut activity, and states that “it is expected that the effect (of this change) will not be large.” This suggests that even the MNRF questions the benefit of delaying the season.

In addition to the questionable utility of this proposal, a delayed season received little support from Focus Group participants or provincial questionnaire respondents. This option was ranked third by Focus Group participants (behind a shortened calf season and an early close to the season), and was ranked fifth by respondents to the provincial moose harvest management questionnaire (1-status quo, 2-shortened calf season, 3-end season earlier, 4-split gun hunt). **If stakeholders expressed greater acceptance for an early season closure, why is the MNRF instead proposing an untested management tool that received little support from resource users?**

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In light of the complete lack of scientific evidence to support this option, the lack of support from stakeholders, and the numerous unintended consequences, the OFAH cannot support the proposed season delay.

OFAH Recommendations

Effective moose management requires assessment and management of all factors that impact moose populations. First and foremost, the OFAH recommends that the MNRF take a more holistic approach to moose management instead of focusing solely on licensed moose hunters. Ontario's moose management program will never reach its full potential until the MNRF fully acknowledges that licensed moose hunters are only a small piece of a much larger puzzle.

There are several management actions that can be implemented to benefit moose populations, and each has a differing level of benefit and impact to licensed hunters. The OFAH considered two guiding principles when formulating our recommendation. First, it is possible to generate a significant benefit to the moose resource while also minimizing the impact on licensed hunters. Second, any changes to licensed hunting must be supported by scientific data. We recognize that many WMUs would benefit from lower calf harvest, as evidenced by chronically low mid-winter calf-cow ratios. The temporal distribution of calf harvest indicates that the vast majority of calves are harvested during the first two weeks of the gun hunt. Therefore, if the MNRF is intent on reducing the open calf season, the OFAH sees value in prohibiting calf harvest during the first two weeks of the current gun hunt. As a first step, we recommend a 4-week open calf season beginning in the third week of the current gun hunt in northern Ontario. This is predicted to reduce calf harvest while also maintaining a reasonable number of hunting opportunities. It would also allow the MNRF to assess the impact of this change and to implement further restrictions, only if required. Finally, we insist that any season change be carefully monitored for effectiveness and repealed if population objectives are achieved or if it is not having the desired effect.

Thank you for considering our comments and recommendations. We look forward to working together to improve the health of Ontario's moose populations.

Yours in Conservation,



Mark Ryckman
Senior Wildlife Biologist

MR/gh

cc: Eric Boysen, Director, Biodiversity Branch, Ministry of Natural Resources and Forestry
Deb Stetson, Manager, Wildlife Policy Section, Ministry of Natural Resources and Forestry
Brad Allison MNRF Northwest Region Wildlife Biologist
Peter Davis MNRF Northeast Region Wildlife Biologist
OFAH Board of Directors
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Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff