ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

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Public Input Coordinator
Wildlife Section
Species Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario
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Dear Sir/Madam:

Subject: EBR Registry **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 230/08 (Species at Risk in Ontario List) under the Endangered Species Act, 2007 for Algonquin Wolf

EBR Registry **012-8105**: Amendment of Ontario Regulation 242/08 (General Regulation – Endangered Species Act, 2007) in response to changes to the Species at Risk in Ontario List.

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 735 member clubs, we have reviewed the proposed amendments to wolf and coyote hunting and trapping in response to changes to the Species at Risk in Ontario List, and we have serious concerns.

We strongly recommend 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).

The government's proposal (and single option) was presented without evidence of a thorough risk assessment of multiple management options, insufficient evidence in support, and a clear lack of consideration for a long-term approach that balances the protection and recovery of Algonquin wolves with hunting, trapping, agriculture, and forestry activity. To be clear, we are not arguing that Algonquin wolves do not need further management attention; we simply disagree with the specific management actions that have been proposed to help restore their populations.

1. ***What specific management options were developed, and how were they assessed?***
2. ***Why were multiple management options not presented for public consultation?***

Species Designation & Naming

The designation of "threatened" (coupled with the name change to Algonquin wolf) has created a very real impediment to the responsible management of wolves and coyotes in Ontario. This assessment has prompted the proposal of additional poorly-evaluated and scientifically indefensible restrictions on the regulated harvest of wolves and coyotes in more areas south of the Ontario wolf management planning area (as described in Ontario's Wolf Conservation Strategy).

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While we understand an analysis of the regulatory provisions contained within O.Reg 242/08 was conducted using a range of factors to make the designation (the size of the species population in Ontario; the rarity of the species; whether the location of species and their habitats occur in the same location as the regulated activities; and whether certain types of activities are likely to adversely affect the species), it is not clear whether the analysis considered ecological (other species and overall ecosystem function), cultural, social, and economic impacts.

Due to the complex history of hybridization in Ontario *Canis* populations, the Algonquin wolf is not your typical species at risk because there is no genetically "pure" Algonquin wolf sample to which we can compare extant individuals. We would also like to point out that the ESA does not make any mention of "hybrids" or "non-native species" (e.g. coyote). Eastern coyotes, which are not at risk, are already managed under the FWCA, so the ESA is not applicable and should have no influence on their management. This is a huge oversight, which will require a much broader discussion and review of the ESA.

No Requirement for an Interim Response

There are processes and mechanisms for wolf conservation already in place that regulate the sustainable harvest of wolves and coyotes in Ontario. The OFAH was supportive of the 2005 Wolf Conservation Strategy with the understanding that the implementation of wolf harvest data collection would help the MNRF demonstrate, over a relatively short time frame, that wolf and coyote hunting and trapping are fully sustainable activities in Ontario. 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 a population decline" under the current management system.

There is also a process for the preparation of recovery strategies and government responses for species at risk. These processes were put in place to avoid ill-informed knee-jerk reactions such as the proposed "interim" expansion of harvest prohibitions. The MNRF is required to develop a recovery strategy and government response statement; however, there is no requirement for the MNRF to ban legal, regulated hunting and trapping. There should be a way for the ESA to recognize existing conservation measures that mitigate apparent "threats" to the recovery species (i.e. hunting and trapping regulations under the FWCA). This would allow these existing regulations to serve as an interim measure "while the requirements under the ESA are being undertaken, including a science-based recovery strategy and a government response statement."

3. ***Given that we have an existing management system in place under the FWCA to conserve Algonquin wolves, and there is no immediate population concern, why is the MNRF proposing a rushed "interim" management action prior to the development of a recovery strategy and government response statement?***
4. ***What does the proposal mean for Ontario's Wolf Conservation Strategy?***

Existing Harvest Prohibitions

There have been harvest prohibitions in Algonquin Provincial Park (APP) and the townships surrounding the park (totaling almost 14,000 km^2) 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 appeared to have remained stable for the previous 30 years. The existing harvest prohibition is essentially a long-term natural experiment. 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.

Furthermore, 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.

Proposed Expansion of Harvest Prohibitions

The MNRF must be honest and transparent about the uncertainties associated with all proposed management options. Harvest restrictions may seem like the easiest management tool to propose in this case (from a political standpoint), but 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 (from an ecological, cultural, social, and economic perspective) of any proposed management solution (interim or long-term) is required.

Major knowledge gaps need to be addressed now and prior to any management decision. The COSSARO report states that hunting and trapping mortality is jeopardizing the recovery of Algonquin wolves, but provides no support for this claim. It is incumbent upon the MNRF to demonstrate that regulated hunting and trapping of wolves and coyotes is jeopardizing the recovery of Algonquin wolves prior to proposing further harvest restrictions.

5. ***What are MNRF's objectives for Algonquin wolf recovery?***
6. ***What evidence was used to determine that hunting and trapping prohibitions will achieve these objectives?***
7. ***How can the MNRF propose management actions without having completed a recovery strategy?***

The following three sections describe our concerns with the rationale being used to support hunting and trapping prohibitions on Algonquin wolves.

Spatial Segregation of Canid Packs

One mechanism to restore Algonquin wolf populations is to give them the opportunity to expand into areas they do not currently inhabit. The landscape is currently saturated with canid packs of various genetic identity (Eastern coyotes, Algonquin wolves, and hybrids) that segregate themselves spatially from neighbouring packs. It is highly unlikely that Algonquin wolf populations will increase and expand outside of protected areas (APP and Kawartha Highlands Provincial Park) because there is no unoccupied space for them to expand into. Algonquin wolves will be unable to expand their range unless 1) a void is created on the landscape, or 2) they can successfully displace coyote or other hybrid packs. This barrier to expansion will continue to exist until harvest prohibitions on other canids, specifically coyotes, are removed. A similar situation is currently playing out in North Carolina, where the red wolf reintroduction program is attempting to create a coyote-free buffer zone to reduce/eliminate the probability of hybridization with red wolves.

Pack Social Structure

Genetic evidence suggests that the existing harvest prohibition may have restored the natural social structure of Algonquin wolf packs, which "is important for effective resource use (i.e. knowledge of prey distribution and ability to detect, pursue, and subdue prey), pup survival and, may be effective, at least in part, at precluding hybridization with coyotes due to the lower turnover of individuals within packs, and the tendency during hybridization events for genes to flow from the more common into the rarer species" (Rutledge et al. 2010). While we recognize the importance of this natural social structure, there is no research to suggest that it will allow Algonquin wolves to outcompete coyotes and hybrids, which will be important for the expansion of Algonquin wolf range in Ontario.

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Genetic Introgression from Coyotes

As mentioned above, in hybridization events, genes from the more abundant species (Eastern coyotes) tend to flow in to the less abundant species (Algonquin wolves). While it may seem important to protect individual Algonquin wolves, it may be more important to ensure that the genetic building blocks of the Algonquin wolf are maintained now and into the future. Genetic swamping by Eastern coyotes could result in further genetic dilution as a result of management actions that make it impossible to reduce coyote abundance. If harvest prohibitions are to remain in place and/or be expanded, the government must demonstrate to the public that continued hybridization with coyotes will NOT jeopardize the genetic integrity of Algonquin wolves. To date, the government has abjectly failed to do so.

Protection of Property

Wolf and coyote depredation continues to be a challenge for Ontario's sheep, cattle, and dairy farmers. For some producers the problem can be quite severe. The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) distributes millions of dollars in compensation annually for livestock killed by coyotes (and wolves).

We are concerned that producers will no longer have the ability to control/remove individual coyotes/wolves or local groups causing damage. Furthermore, hunting 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 depredation (through regulated hunting and trapping) results in producers earning a higher return from the market place, generates an economic benefit for the province, and reduces the need for government compensation.

8. ***How has the MNRF considered depredation concerns and the potential increase in compensation related to this proposal?***

Provision of Habitat

Ancillary to these two proposals, we feel that it is vital for sustainable forestry activity to continue in areas where it is currently permitted. Forest management plans consider the provision of habitat for moose, deer, and beavers, all of which are important prey species for the Algonquin wolf. If habitat is incapable of supporting healthy prey populations, then recovery of the Algonquin wolf will certainly fail.

Conclusion

Hunting and trapping of canids is a traditional and sustainable activity that generates and provides significant socio-economic benefits. There is no evidence to suggest that current regulated harvest levels are not fully sustainable and consistent with Algonquin wolf recovery. The OFAH is committed to the conservation of Algonquin wolves in Ontario, but we believe that hunting and trapping can continue to occur while ensuring the species' conservation needs are met. The current proposal to amend the FWCA does not offer anything close to the rationale that is required to develop an informed opinion and/or make management decisions that have such significant consequences. Until there is sufficient evidence to suggest otherwise, further restrictions on hunting and trapping are unnecessary and inappropriate.

In closing, setting effective conservation policy requires an analysis of the effectiveness of, and unintended consequences of, using harvest prohibitions to restore Algonquin wolf populations, as well as an open discussion of alternative management solutions. Despite multiple discussions with staff from the MNRF Species Conservation Policy Branch, we are not convinced that this analysis or discussion has occurred. Continued abuse of the precautionary principle by the provincial government will ultimately lead to management policies that are indefensible and a further loss of trust and confidence in the government's ability to competently manage wildlife.

Yours in Conservation,

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