

# 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](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

OFAH FILE: 410A/794  
October 25, 2016

Public Input Coordinator  
Ministry of Natural Resources and Forestry  
Species Conservation Policy Branch  
Wildlife Section  
300 Water Street, Box 7000  
Peterborough, Ontario  
K9J 8M5

Dear Sir/Madam:

**Subject: Amendments to Ontario Regulation 665/98 (Hunting) and Ontario Regulation 670/98 (Open Seasons) made under the Fish and Wildlife Conservation Act to enhance and modernize Ontario's wild turkey hunting program: EBR # 012-8597**

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the regulation proposal notice #012-8597 and have the following comments.

## General Comments

Overall, we are pleased to see many of the amendments being proposed to enhance and modernize Ontario's wild turkey hunting program. The OFAH has sought many of these wild turkey hunting opportunities and additional ones for some time now.

- 1) Remove the requirement for a separate wild turkey education course (course content will be incorporated into the broader Ontario Hunter Education Program). Existing accredited hunters who have not yet completed wild turkey hunter education training would be allowed to hunt wild turkeys without any further training. Note: the ministry is exploring options to share and distribute turkey hunting information to existing accredited hunters (e.g. making information available online).*

There is general support for incorporating the wild turkey education course into the broader Ontario Hunter Education Program (OHEP). The OHEP is a well-recognized mandatory program requiring all new hunters to complete and pass an exam. While we are convinced all new hunters would receive the appropriate wild turkey education through a new and improved OHEP, there is still the matter of existing accredited hunters who have not yet completed any wild turkey hunter education but would be allowed to hunt wild turkeys without any further training. As such, we strongly recommend that the ministry explore all options to address this concern, including distributing wild turkey hunting information to existing accredited hunters. Safety must continue to be first and foremost. We also recommend that the ministry continue to work closely with the OFAH to develop a strategy for implementing these changes.

October 25, 2016

Page Two

- 2) ***Introduce a spring wild turkey hunting season in WMU 36 and introduce a fall wild turkey hunting season in WMU 94. These two WMUs meet criteria outlined in the Wild Turkey Management Plan (2007) for opening of new seasons.***

The wild turkey population continues to increase and expand. Consistent with the criteria for opening new seasons outlined in the Ontario Wild Turkey Management Plan, new hunting opportunities (where they exist) have also expanded considerably. We strongly support introducing a spring wild turkey hunting season in WMU 36 and a fall wild turkey hunting season in WMU 94. The proposed new seasons will benefit hunters and create new opportunities (recreational, economic, etc.) especially in WMU 36.

- 3) ***Introduce a fall bows-only season from October 1-31 in all WMUs that have a fall wild turkey hunting season. The regular firearm wild turkey hunting season would remain the same, opening the Tuesday after Thanksgiving and running until the second following Sunday.***

The OFAH fully supports introducing a fall bow season from October 1-31 in all WMUs that have a fall wild turkey hunting season. A fall bow season (in addition to the two-week open firearm season) would provide additional sustainable fall hunting opportunities, as well as allow deer bow-hunters the opportunity to hunt turkey concurrent with the bows-only season for deer in many WMUs.

We also believe there are substantial cultural and traditional benefits generated through introducing a fall bow season for wild turkey. The bow season would allow hunters to hunt for a fall wild turkey prior to the Canadian Thanksgiving, an autumn harvest celebration for many hunters and their families.

- 4) ***Standardize the opening of the spring wild turkey hunting season to be April 25<sup>th</sup> of each year, even when the 25<sup>th</sup> falls on a weekend.***

A standardized date for the opening of the spring wild turkey hunt is a long-standing request of the OFAH. We believe an April 25 opener would provide multiple benefits. It would alleviate any confusion around the current regulation (i.e. when April 25 falls on a weekend); and occasional weekend hunting opportunities will particularly benefit working families; as well as all of the associated socio-economic benefits brought by this new opportunity.

We do recognize that there are some municipalities that still do not permit Sunday gun hunting, which may result in some hunters not being able to participate on the opening day when April 25 falls on a Sunday.

- 5) ***Allow shot size number 7 to be used for wild turkey hunting in addition to shot size numbers 4, 5, and 6.***

All hunters, regardless of the quarry sought, are required to hunt within their effective range to ensure a clean, quick kill. While there are no major objections to this proposal, the added benefit of allowing shot size number 7 is not well understood. Has the MNRF done a jurisdictional scan to help demonstrate the rationale behind this proposal? We understand certain manufacturers are now accommodating shot size 7 in their turkey loads (i.e. with shot sizes 5 and 6), but it is not clear to what extent these loads are available. If these loads are currently available in Ontario, we applaud the MNRF for taking the initiative through this proposal to ensure law-abiding hunters are not unknowingly in violation of the current regulations (i.e. shot size requirement).

October 25, 2016

Page Three

- 6) *Clarify through regulation minimum bow requirements for hunting wild turkey (e.g. minimum draw weight and length) according to the current guidelines found in the Hunting Regulation Summary for wild turkey hunting with a bow.*

There is support for clarifying through regulation the minimum bow requirements for hunting wild turkey (e.g. minimum draw weight and length, etc.). We understand this proposal is simply correcting an oversight (i.e. the current requirements are not actually listed anywhere in regulation, only in the Hunting Regulations Summary) and that the current "guidelines" found on page 24 of the summary for wild turkey hunting with a bow will be maintained. To be clear, the OFAH would not support any change to the current "guidelines" without further consultation.

In closing, we are privileged to be able to enjoy both spring and fall hunting in Ontario. While fall seasons should remain conservative, they still can provide quality recreational opportunities to hunters with no negative impact on the turkey population. As such, we continue to believe the current criteria for opening fall seasons may not be adequate for smaller WMUs, such as WMU 71, where we believe the population has likely reached its capacity at a level of abundance sufficient to sustain a fall hunt, but would never meet the criteria for opening a fall hunt. The same can be said about other WMUs (e.g. 70, 72 and 86), which appear to have reached optimal capacity, but again remain below the prescriptive >200-bird harvest criterion.

The OFAH commends the MNRF for recognizing proposals by the OFAH and turkey hunters, and proposing enhancements to turkey hunting in response. We appreciate the opportunity to comment and look forward to seeing the proposed regulatory changes (EBR # 012-8597) being implemented in 2017.

Yours in Conservation,



Dawn Sucee  
Fish and Wildlife Biologist

DS/jb

cc: OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish and Wildlife Services  
Dave Pind, OFAH Manager, Hunter Education Program  
Mark Ryckman, OFAH Senior Wildlife Biologist