

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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January 27, 2017

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

**Subject: EBR Registry 012-9169: A Small Game and Furbearer Management Framework for Ontario; and  
EBR Registry 012-9170: Amendments to Regulations Under the Fish and Wildlife Conservation Act, 1997 to Streamline and Modernize the Management of Small Game Furbearer Wildlife Species in Ontario**

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 Ministry of Natural Resources and Forestry (MNR) proposed *Small Game and Furbearer Management Framework*, as well as the proposed regulatory changes for small game and furbearer species in Ontario and ask that our comments be weighted accordingly.

## **General Comments**

The OFAH is generally supportive of many of the proposals because we recognize some current small game regulations (e.g. seasons) vary widely and have not been updated for decades. We strongly believe small game management should be reviewed to better reflect the current distribution of species and hunting opportunities in Ontario, and to address significant knowledge gaps. A review of small game management has been a long-standing request of the OFAH, and we are pleased the MNR is making this a priority.

## **A Small Game and Furbearer Management Framework for Ontario (EBR# 012-9169)**

Small game and furbearer species are an essential part of Ontario's biodiversity. Small game hunting and trapping has been, and continues to be, an important traditional activity providing multiple benefits (e.g. ecological, social, and economic) to the people of Ontario. We are pleased the MNR is committed to the management and sustainable use of small game and furbearer species for the long-term benefit of all Ontarians. The Framework should quantify the modern relevance and importance of small game hunting to Ontarians. For example, an analysis of licence sales from 2011-2014 shows that almost 60 percent of all resident Ontario hunters (266,478 of 453,524) in 2013 bought a small game licence. When you add in non-residents (7,181), small game licence sales alone contributed approximately \$7,228,627.20 to the Fish & Wildlife Special Purpose Account (SPA) in 2013. The same sort of analysis could be done for trapping royalties to determine the total direct financial contributions to the SPA, which funds a large portion of fish and wildlife management activities in Ontario. This type of information would help the general public to understand the importance of these activities to Ontarians, and also provide concrete examples of how hunters and trappers contribute to conservation and management.

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In general, we support the intent of the proposed *Small Game and Furbearer Management Framework* (hereafter “Framework”), which is to guide decision-making related to the management of small game and furbearer species; however, it is not clear if, or how the draft policy was used to guide the accompanying proposed regulatory changes. The public would have benefitted from a specific explanation of how the proposed regulation changes align and/or support the strategies identified in the Framework.

Overall, the OFAH would still like to see clearer targets/objectives established, in addition to refining management direction that optimizes the ecological, social, economic, and recreational benefits accrued through sustainable hunting and trapping.

### **Goal**

There is general support for the stated management goal; however, it is not clear what the term “ecologically sustainable populations” means? Wildlife management should consider more than ecology. Given that this is a “management framework,” the goal should be to “ensure sustainable management” of small game and furbearers and their habitats, as important components of the biodiversity of Ontario, and for the continuous ecological, cultural, economic, and social benefits for the people of Ontario.

### **Guiding Principles**

We question the appropriateness of “Intrinsic Value” as a guiding principle. Intrinsic value is a philosophical term (ethical, moral) and there is still confusion about what it actually means with respect to the management of wildlife. Can intrinsic value be objectively measured and quantified? And if not, is it really appropriate to use it to influence wildlife management decisions? We recommend removing Intrinsic Value from Guiding Principles because the management goal already incorporates what is described under the principle. Additionally, guiding principles should be used to influence management decisions, but Intrinsic Value is irrelevant in that manner.

We strongly support the recognition of the importance of hunting and trapping. Hunters and trappers have (and continue to) contribute significantly to the conservation of wildlife species and their habitats. Hunting and trapping are also important wildlife management tools, and play a significant role in population monitoring. This should be a principal focus of the management framework and related strategies.

There is general support for the other guiding principles, and we are pleased to see an adaptive management approach built-in to respond to population status changes, to ensure sustainability and/or maximize opportunities, as well as a commitment to periodically review the framework.

We understand that MNRF is committed to a broader landscape approach to management; however, landscape management must also incorporate more than just streamlining limits and seasons based on “ecologically similar areas.” The management objective for a landscape approach should be demonstrated better within the Framework itself.

One noted deficiency is the absence of timelines for delivering on the proposed strategies. We strongly recommend that the framework include a statement of deliverables which are achievable, measurable, and associated with a timetable.

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### **Management Objectives and Strategies**

**Sustainable Populations:** There is general support for this objective and many of the supporting strategies. We also appreciate the strategies that support research (1.2.1) and monitoring (1.2.2), as these efforts have been sorely lacking in the past. Where there are knowledge gaps related to the presence, relative abundance, or health of small game bird or mammal populations that are an impediment to management, conservation and/or future sustainable use, these applied research needs should be identified and prioritized within the framework.

Naturalized species such as Hungarian partridge, European hare, and ring-necked pheasant were historically introduced and produce no negative impacts on native ecosystems and are a valued resource. We appreciate the framework's recognition of naturalized species and the identified need to consider approaches for their future management (Strategy 1.3). However, this is not adequate, and naturalized species management would be better served by having a clear management objective established.

**Ecological Integrity:** We have concerns with this objective and some of the proposed supporting strategies. In our experience, "ecological integrity" is used largely as a preservationist term suggesting that ecosystems only have integrity when there is no human activity. The use of the word "intact" in this objective may be misinterpreted to mean that ecological integrity equates to "no-use." Wildlife management, including sustainable use, can actually enhance ecological integrity. The OFAH recognizes the importance of intact and functioning ecosystems as it relates to the management of small game and furbearer species and their habitats. Ecological integrity, if used in that context (with strategies to support it), could be of value to the Framework. We recommend rewording this objective (e.g. remove word "intact") to ensure there is no misinterpretation.

We are concerned with the language used in some of the strategies under this objective, particularly where the wording suggests we have existing widespread issues. Strategy 2.3.1 and 2.3.2 should focus on management as opposed to limitation. For example, 2.3.1 should be reworded to say "Releases of small game and furbearer species will continue to be managed to support immediate hunting opportunities..." Strategy 2.3.2 could be modified in a similar manner. Although these wording changes are relatively minor and do not change the overall intent, they would help clarify and prevent misinterpretation.

**Habitat Provision:** The habitat objective is too broad and it is not clear how the supporting strategies will achieve the objective. Implementation under this objective is essential to the management of small game species given what we know about land use changes in certain areas of the province. The objective should be clear and include direction for ecosystem-based habitat management to support small game and furbearer species. While we appreciate strategies that support and promote stewardship and community-based programs, secure funding for these programs must be a priority. In areas of the province where lands are predominately privately owned, government tax-incentive programs (e.g. Managed Forest Tax Incentive Program) are critical for maintaining small game and furbearer habitat. Further, ALUS Canada should be recognized specifically as a key program for the delivery of habitat restoration and ecosystem services. In the past, the MNRF developed and distributed excellent resources for private land stewardship, including strategies for wildlife habitat augmentation. The demand for this information remains, but the resources are often dated or not publicly accessible. We recommend that the MNRF work with groups like the OFAH and Ontario Woodlot Association to ensure Ontario's private land stewards have the information they need to make positive contributions to wildlife conservation.

**Socio-Economic Benefits:** There is general support for this objective and the supporting strategies; however, the economic benefits accrued through sustainable hunting and trapping are still underrepresented in the supporting strategies. We are encouraged by the strategies that speak directly to providing for an optimal range of cultural, traditional, recreational and economic benefits associated with sustainable populations of small game and furbearer species. There is also strong support for providing and promoting a variety of small game hunting opportunities (4.2.1) – small game hunting has traditionally been the entry point for many young hunters.

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**Communication and Education:** Well informed Ontarians are important to the effective management (and sustainable use) of small game and furbearer species and their habitats. There is general support for the objective and strategies, and we believe the MNRF has an important role to play in promoting sustainable resource use. We also believe the framework would benefit from recognizing the importance of sporting dogs including training and trialing (and otherwise encourage and support these events). Government promotion of small game hunting should capitalize on the increasing interest in hunting among non-traditional segments of society. This promotion should include, but is not limited to showcasing the benefits of hunting, guidance on how to get started, and information on where public hunting opportunities exist.

The MNRF should partner with the OFAH to develop an education/communication plan to encourage hunter participation in small game hunting and surveys, as well as habitat restoration projects.

**Implementation:** The MNRF, in partnership with other jurisdictions, agencies, and non-government organizations, already has many of the tools needed for this framework to be successful. However, without a clear commitment for continued funding to achieve the strategies identified within the framework, implementation will be challenging. Furthermore, it is going to be very difficult to evaluate the policy's implementation without measurable, quantitative targets (i.e. desired outcomes). The OFAH strongly supports the development of science-based targets. We also recommend that targets for each management objective be developed for appropriate effectiveness monitoring.

While we strongly support the proposed "desired outcomes" including sustainable populations, effective habitat management, etc. – sustainable use (hunting and trapping) must also be a desired outcome.

**Proposed Changes to Small Game and Furbearer Hunting Season and Limits (012-9170)**

In principle, we support reducing the number of different seasons (i.e. simplifying) for small game and furbearers; however, we have a few concerns with respect to the proposed management areas and the intent to make seasons and limits consistent within them. While we can appreciate MNRF's aim to streamline regulations (e.g. seasons, limits) within these areas, the OFAH does not agree that it is necessarily appropriate to apply this approach broadly for certain species in certain parts of the province. For example, in Southwestern Ontario and the Greater Toronto Area (GTA), the landscape (and available habitat) is very different from other areas (e.g. Kawartha Lakes, Grey Bruce, etc.) within the MNRF's recently defined area (purple). Upon close examination of the ecological land classifications, land use changes, and habitat availability, it is clear that there are many units currently included in the purple area that should actually be included in the green area. As a starting point for discussion, we recommend including WMUs 68, 73, 74, 75, 76, 82, 83, and 84 in the green area. Some OFAH members have also expressed concerns that the northernmost WMUs in the proposed green zone may be more appropriately grouped with the yellow zone, based on similarities in available habitat and harvest potential. Furthermore, the public has not been provided with any background rationale explaining these groupings. In the spirit of transparency and accountability, the MNRF should make this information available. Small game hunting regulations should be simplified and standardized where doing so does not compromise the conservation and optimal sustainable use of populations. For greater clarity, the MNRF should not compromise sustainable hunting opportunities for the sake of simpler regulations.

**Pheasant Season and Limits:** The proposed regulatory changes would have benefited from having clear rationale – the management objective for pheasants is not clear. An important and outstanding question is - what proportion of the population is self-sustaining (versus released pen-reared birds)? If there are hardy, wild, free-ranging pheasants in Southern Ontario, there should be more resources directed to the management and restoration of these birds.

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We also understand there are a number of hard working clubs and organizations (e.g. Friends of Hullet, Gosfield North Sportsmen's Club, etc.) that allocate funds and resources towards releasing pheasants and administering public hunting opportunities. There is concern that the proposed daily bag (10 birds) increase will have a serious negative impact on pheasant hunting opportunities in these areas. Many of these organizations (and areas) have been delivering these unique pheasant hunting experiences for decades, while simultaneously conserving exceptional pheasant habitat, which benefits other wildlife species. Were these organizations consulted prior to the EBR posting?

There is a limited number of pheasants released and increasing the daily bag limit could reduce the number of hunters having an opportunity to encounter these birds, thus undermining the efforts and rationale of the program (i.e. to provide quality public hunting opportunities). Further, a reduction in opportunities could cause a reduction of use and support for other important programs in these areas as well. We do not support the proposed bag limit increase for ring-necked pheasant and strongly recommend further consultation with these clubs and organizations.

*Proposed Sharp-tailed Grouse and Ptarmigan Seasons and Limits:* We support separating sharp-tailed grouse and ptarmigan hunting regulations, and the review of daily and possession limits. The proposed changes should more accurately reflect the actual distribution of these two species in Ontario, but should not be restricted without sufficient evidence of presence and absence.

*Proposed Ruffed Grouse and Spruce Grouse Seasons and Limits:* There is general support for the proposed season changes (e.g. extending closing to December 31 in Northeastern Ontario to make the closing date consistent with the rest of northern and southern Ontario). We believe this will provide welcome additional hunting opportunities in the northeast, while having no negative impact on grouse populations or sustainability.

We also support amending the combined regulations for ruffed and spruce grouse to reflect the actual distribution where these species overlap.

*Proposed Ruffed Grouse Seasons and Limits:* The proposed season and bag limit for ruffed grouse in the purple area is another example of how applying a broad management approach across very different landscapes may be inappropriate. We could likely support a more restrictive bag limit in the areas that lay along and south of the Highway 401 corridor, but there is no evidence to support more restrictive limits across all of Southern Ontario. The MNRF should be reviewing regulations with the view to restore and sustain populations only, if present harvest is a conservation concern. Furthermore, it is important for the MNRF to determine and communicate the cause (e.g. habitat loss) of ruffed grouse range contraction in these areas. Chapters of the Ruffed Grouse Society can provide local insight and assistance, and should be engaged directly.

We believe in areas covered by Bruce County in the west and continuing east and beyond Peterborough County, the populations and habitat are sustainable and able to support the current harvest limit. Unless the MNRF is able to demonstrate otherwise, we cannot support the proposed daily limit of two birds in these areas. We recommend the regulations be reviewed with the goal of enhancing sustainable hunting opportunities (and standardize) where there are no conservation concerns. A greater focus on habitat conservation and enhancement would be a more suitable management approach in these areas.

*Proposed Gray (Hungarian) Partridge Seasons and Limits:* Gray partridge range continues to shrink. Populations are apparently restricted only to the Norfolk/Oxford/Brant areas of Southwestern Ontario, and Prescott/Russel, Stormont/Dundas, Glengarry, and Renfrew/Ottawa areas of Southeastern Ontario. Hunting regulations should be amended to reflect their current distribution. We support the proposed changes (reduced limits) to promote conservation and possible recovery of birds.

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*Proposed Gray (Black) and Fox Squirrel Seasons and Limits:* There is support for more consistency and standardization of Southern Ontario squirrel hunting seasons, in particular, expansion of the short eight-day season in WMUs 93 and 94 to September 25 to December 31.

With respect to red squirrels (currently classed as a furbearer) we have had several inquiries from our members on the possibility of opening a hunting season. Although outside the scope of this EBR, we would be interested in discussing this further with the MNRF.

*Proposed Varying (Snowshoe) Hare Seasons and Limits:* The proposed changes for varying hare are substantial and, unfortunately, the MNRF has not provided any rationale to support such a change. Again, applying a broad approach to the management of varying hare across all the WMUs in the yellow and orange areas on the map with WMUs 36, 37, 42-50, and 53-67 (green area) may not be appropriate. We do not believe the proposed regulation changes for this area reflect an understanding of hunter effort or the resource itself. Varying hare are highly cyclical and underutilized in the northwest part of the province the current regulation (i.e. season and no limit) reflects this. Where is the evidence to support a reduced season and limit (i.e. five daily and a possession of 15) across this area? The OFAH does not support the proposed changes due to the current lack of empirical data.

In Southern Ontario, there are also several WMUs that will experience an unnecessary bag limit reduction due to their inclusion in the purple area.

*Proposed Cottontail and European Hare Seasons and Limits:* We appreciate the MNRF's aim toward expansion and standardization of cottontail and European hare hunting seasons in Southwestern Ontario with the view to opening seasons earlier (e.g. September 25) rather than late October. However, again there are several WMUs that will experience an unnecessary bag limit reduction due to their inclusion in the purple area. As mentioned above, we recommend moving several WMUs from the purple area to the green area to address this concern.

The OFAH has heard from a number of non-resident members on the issue of allowing licensed non-residents to hunt rabbit and hare in the counties of Lambton, Kent, and the entire county of Essex. We understand the existing restriction on non-resident small game hunters is no longer required, and we expect this proposal will be a welcomed change for non-resident rabbit and hare hunters.

*Proposed Furbearing Mammal Hunting Seasons:*

**Raccoon** – We support increasing season length and opportunities. Raccoon seasons have not been updated for years and have not kept pace with increasing populations. There are no concerns with allowing licensed non-residents to hunt raccoon at night, as we understand the existing restriction is no longer needed for this activity.

**Red Fox** – no recommendations for change. We note that fox hunting seasons and trapping seasons have different open seasons in some areas of the province. What is the rationale for these discrepancies?

**Artic Fox** – no recommendations for change.

**Skunk** – no recommendations for change.

**Weasel** – no recommendations for change.

**Opossum** – We appreciate the proposed changes that will extend the season length; however, the OFAH is still not convinced this will be adequate for effectively managing opossum. This is a non-native species that continues to expand its range in Southern Ontario. Has the MNRF considered the potential impact of opossum on other small game and furbearers? What is the management objective for this species?

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*Proposed Game Amphibian and Reptile Seasons and Limits:*

**Snapping Turtle** – The OFAH supported mandatory reporting of snapping turtle harvest as a component of the monitoring and assessment program. A monitoring and assessment program should have also included population demographic data, including abundance, geographic distribution, age-class structure, and recruitment. To our knowledge there still has been no attempt to estimate snapping turtle abundance and distribution in Ontario.

Snapping turtles are frequently encountered by Ontario anglers and hunters. Data collection and reporting (e.g. mandatory harvest reporting) can provide critical information to evaluate status and population trends over time. We do not support the proposed changes to reduce season length and harvest due to the current lack of empirical data, which is required to rationalize any proposed change to existing regulations. We strongly recommend that the MNR continue to collect (and report on) harvest information to support management decisions.

**Bullfrog** – There is general support for the slight season change. We do not believe this will have a negative impact on bullfrog populations or sustainability.

*Proposed Falconry Seasons and Limits:* Falconry should be recognized within the framework as a small and growing method of small game hunting within Ontario. It should also be mentioned that regulations are reviewed through the Provincial Falconry Advisory Committee. We strongly recommend collaboration with the falconry community (e.g. Ontario Hawking Club) in all aspects of falconry management.

*Proposed Furbearer Trapping Seasons:* While there is general support for modernizing the description of areas where furbearing mammals may be trapped in Ontario to use existing WMU boundaries, we strongly recommend further collaboration with the trapping community (e.g. Ontario Fur Managers Federation) in all aspects of their management.

In closing, we would like to reiterate our general support for updating the small game hunting regulations and policies, under the Fish and Wildlife Conservation Act to optimize the ecological, social, economic, and recreational benefits that accrue through sustainable hunting of small game birds and mammals.

We appreciate the opportunity to comment and we look forward to seeing some of the proposed regulatory changes implemented in 2017.

Yours in Conservation,



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DS/gh

cc: OFAH Board of Directors  
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