

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

OFAH FILE: 406/794
April 18, 2017

PUBLIC INPUT COORDINATOR
Ministry of Natural Resources and Forestry
Policy Division, Species Conservation Policy Branch
300 Water Street
Peterborough, Ontario
K9J 8M5

To Whom It May Concern:

SUBJECT: EBR # 013-0056 - White-tailed Deer Management Policy for Ontario

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit conservation-based organization, representing 100,000 members, supporters, and subscribers, and 740 member clubs. We have reviewed the draft White-tailed Deer Management Policy for Ontario and submit the following comments for consideration.

General Comments

By necessity, the commitments and strategies outlined in the draft policy are broad in nature. The most useful component of the policy is that it will enable the drafting of guidelines for population objective setting and harvest management. These follow-up documents have the potential to tangibly impact deer hunters and hunting, and will therefore be much more relevant to the average deer hunter in Ontario. We look forward to participating in the drafting of these guidelines.

As stated in the draft policy, deer contribute significantly to the social, economic, and ecological fabric of Ontario. One of the most tangible benefits of a sustainable deer population is the economic contribution of deer hunting. In 2015, almost 189,000 resident deer hunting licences were sold, generating over \$9 million for fish and wildlife management. Additional deer seals and farmer's licence tags contributed an additional \$650,000. The value of deer hunting should be actively promoted by the MNRF.

Comments on Specific Strategies

Strategy 1.1 – Develop Population Objective Setting Guidelines

We strongly encourage the government to prioritize the development of population objective setting guidelines. Society holds a wide variety of opinions on acceptable deer densities, informed by personal desires for hunting opportunities, impacts of human-deer conflicts, and viewing opportunities. The public deserves an opportunity to provide their input on desired deer densities in their area.

Strategy 1.2 – Assess Population Status and Trend

Monitoring and assessment are key components of sustainable deer management; the MNRF must ensure that it has robust, science-based information available to justify its management decisions. The current reliance on trend information has served Ontario adequately in the past, but a periodic review is essential to ensuring that our deer management system is sufficiently responsive to change. A review of the province's monitoring and assessment program must first start with a clear definition of data requirements. We fully support a review of deer population modelling; however, the province must commit to investing in deer research to improve the accuracy of parameter inputs if the review identifies any knowledge gaps, including the impact of predation and winter severity on deer populations.

April 18, 2017

Page Two

Strategy 1.3 – Hunter Information

Echoing our comments above, the government must clearly define its data needs and communicate the importance and utility of this information to the hunting community. While we recognize the importance of hunter activity and harvest information to proper deer management, the OFAH does not support the collection of unnecessary and superfluous information from hunters. Deer hunters are a wealth of information and are willing to contribute information if its benefits are clearly communicated. The periodic collection of deer jaws, teeth, and other biological information at check stations contributes greatly to our deer knowledge, engages hunters directly in deer management, and serves to remind the hunting community and the general public of the importance of contributing information.

A healthy deer population contributes significant social and economic benefits to the province, a fact that is easily ignored or forgotten by many outside of the hunting community. There is tremendous value in periodically estimating the economic contribution of deer hunting to the province, similar to the analysis that Len Hunt performed for moose through the Moose Project.

Strategy 1.4 – Harvest Management Guidelines

The development of harvest management guidelines is a logical complement to the population objective setting guidelines, and is likely to garner greater interest from the hunting community than this draft policy.

In January 2013, the OFAH requested a review of the Controlled Deer Hunt (CDH) system to assess its success and usefulness. It is our position that many Controlled Deer Hunts have never been fully subscribed and, therefore, there is no need to maintain a restriction on hunter numbers in these areas. We look forward to being engaged in the CDH review, and hope that this deer management policy will serve as a catalyst for outstanding conversations about deer management.

Recently, the MNRF took steps to increase the OFAH's involvement in the deer tag allocation process. We thank the MNRF for the opportunity to provide direct input to deer managers, and look forward to annual discussions. Given the speed at which deer populations can fluctuate, deer managers must maintain the flexibility to adjust harvest targets through split seasons and the use of additional deer seals where appropriate. We trust that these management tools, such as the Deer Decision Support System or something similar, will be reflected in the harvest management guidelines.

Strategy 1.5 – Impact of Climate Change on Deer Populations

Climate change will impact species in a variety of ways. Deer range is expected to shift northward, and changing forest composition and carrying capacity is predicted to benefit deer in many areas of the province. As deer range shifts further into core moose range, the risk of brainworm transfer to moose (and associated moose population declines) increases. Management of deer populations through enhanced hunting opportunities (e.g. additional deer seals) may help mitigate risks like parasite transfer, over-browsing, and other direct and indirect impacts on species like moose and caribou. The MNRF has conducted a vulnerability analysis for moose in northeastern Ontario related to climate change (Climate Change Research Report 26), and we encourage the province to conduct a similar exercise for deer. Knowledge of the predicted effects of climate change on deer will help the government manage deer over longer time frames and broader spatial scales.

Climate change is also expected to result in the range expansion of disease vectors such as biting midges and black-legged ticks; therefore, it is important to conduct a baseline assessment of vectors for diseases such as epizootic hemorrhagic disease (EHD), bluetongue, and Lyme disease. Due to the potential impact of these diseases on both deer and people, the OFAH is financially supporting research into EHD and bluetongue by the Canadian Wildlife Health Cooperative and the University of Guelph.

April 18, 2017

Page Three

Strategy 2.1 – Deer Habitat Management

The popularity of private land stewardship and incentive programs continues to increase as landowners recognize that they play an important role in wildlife management and conservation. Due to the extent of private land ownership (especially in Southern Ontario), programs such as the Conservation Land Tax Incentive Program (CLTIP) and the Managed Forest Tax Incentive Program (MFTIP) are vital to conservation efforts. The Government of Ontario should continue to invest in and encourage participation in these programs; however, there are other important programs in Canada that do not rely on government funding, which can be unpredictable. One such program, ALUS Canada, has developed a community-based model for encouraging and compensating farmers for good stewardship and development of habitat for deer and other wildlife on private farmland. ALUS Canada targets habitat that is at a high risk of being lost, and partners with farmland owners to protect and develop it through project planning, financing, and annual ecosystem service payments. The OFAH recommends that the MNRF collaborate with regional ALUS programs to identify high-priority deer habitat on private farmland, and through ALUS, partner with landowners to maintain, develop, and enhance habitat for deer and other types of wildlife, including species at risk.

We are concerned that the prohibition on hunting in many federal and provincial parks and conservation reserves has resulted in overabundant deer populations that negatively impact park habitats and jeopardize protected area management goals. Proactive management of deer through ongoing licensed hunting can help reduce the need for targeted culls. Licensed hunters have demonstrated that they are willing to pay for the opportunity to address overabundant deer populations, but the MNRF does not currently give them the opportunity. We recommend that the MNRF, to the extent of its jurisdiction, consider enlisting licensed hunters to participate in deer reduction efforts in protected areas when and where appropriate.

Strategy 3.1 – Deer Health Concerns

Chronic wasting disease (CWD) is by far the greatest threat to Ontario’s deer populations. Ontario has taken steps to address certain pathways for CWD into the province, such as restricting the movement of live cervids and prohibiting the use of high risk animal parts and natural attractants, but the MNRF has not addressed the real threat. The cervid farming industry continues to operate in Ontario, posing significant risks to native wild deer, elk, and moose populations. **The OFAH continues to call on the government to implement mandatory double fencing around active cervid farms, with the ultimate goal of phasing out cervid farming entirely (with appropriate compensation for farmers).** Concrete commitments are needed to eliminate remaining pathways, including funding for monitoring and assessment. This policy does very little to advance the goals of CWD prevention.

Strategy 3.2 – Addressing Threats to Deer Health

The provincial government’s refusal to address the looming threat posed by the cervid farming industry means that it is only a matter of time before CWD is discovered in our province. For example, escaped farmed red deer have persisted in the wild in the North Bay District for several years, and are now producing offspring. Despite having the legislative authority to remove those animals from the landscape, the MNRF continues to do little to address the issue. **We recommend that the MNRF exercise its authority to kill these animals to eliminate the threat of disease spread to wild cervids in the area, including reintroduced elk populations.**

If the government fails to prevent the arrival of chronic wasting disease, efficient communication and disease management will be needed to contain its spread. We understand that the provincial *Chronic Wasting Disease Surveillance and Response Plan* contains a communications plan, but it excludes effective stakeholder groups such as the OFAH. We have multiple communication vehicles at our disposal and would be an effective conduit for the timely dissemination of information. **We recommend revisiting the Response Plan to include other interest groups as communication partners.**

Strategy 4.1 – Consideration of All User Groups

The MNRF often contributes to the divide between user interest groups, including promoting the perception that consumptive and non-consumptive uses of wildlife are somehow incompatible or mutually exclusive. We are convinced that a deer density that meets the hunting community’s demands for high-quality deer hunting opportunities will also meet the demands of non-consumptive uses such as wildlife viewing. These goals are neither competing nor mutually exclusive. The ultimate goal of deer management should be healthy and sustainable deer populations for all Ontarians; harvest planning can be a component of this strategy.

April 18, 2017

Page Four

We have concerns about the MNRF's plan to consider the views of all user groups in the harvest planning process. Given that the province recognizes and supports regulated deer hunting, harvest management discussions should be limited to groups and individuals that possess demonstrated expertise in deer management and harvest planning. Determining the number of deer that can be sustainably harvested each year should be based on biological research, inventory, habitat analysis and management, etc. Anti-hunting sentiments have no place in harvest planning discussions, and should not factor into finding a "balance" during decision making.

Strategy 4.2 – Recognition of Aboriginal and Treaty Rights

We fully support the reciprocal sharing of deer harvest information between the MNRF and Indigenous communities. We strongly encourage the MNRF to engage interested communities in deer management to ensure that all deer harvest is sustainable and resource benefits are shared fairly by Indigenous and non-Indigenous people alike.

Strategy 4.3 – Distribution of Hunting Opportunities

We fully support the strategy to maintain and increase deer hunting opportunities. Due to the significant increase in participation by bowhunters, we recommend that the MNRF engage stakeholder groups (including the OFAH) in a discussion about the equitable distribution of hunting opportunities between gun hunters and bowhunters. The development of harvest management guidelines is a logical place for these details.

Strategy 4.4 – Enforcement and Compliance

The OFAH is a dedicated supporter of Ontario's Conservation Officers and the protection they provide for our natural resources. Poachers are not members of the hunting community and intentional theft of our natural resources is unacceptable. We applaud the MNRF Enforcement Branch for investing in new equipment and technologies over the past few years. Effective enforcement will require continued investment in both personnel and new technologies. The MNRF should also increase efforts to inform the public that interfering with legal hunting and fishing activity is punishable under the FWCA. The OFAH would welcome any opportunities for partnerships with the MNRF to develop and deliver joint messages related to enforcement and compliance campaigns.

Strategy 5.1 – Human-Deer Conflict

The OFAH is an active member of Ontario's Human-Wildlife Conflict Advisory Group (HWCAG), which provides advice to multiple provincial ministries on human-wildlife conflict issues. We support increased education and communication about preventing human-deer conflicts and propose that the HWCAG is an appropriate committee for these discussions.

Section 8.0 – Implementation

We are disappointed to see that the draft policy does not contain firm timelines for the development of harvest management guidelines and population objectives. We recommend that the MNRF prioritize the development of these documents, as they will serve as important cornerstones for sustainable deer management going forward.

In closing, we fully support the draft policy despite some of the concerns and recommendations outlined in this submission. We look forward to continuing to work with the MNRF to ensure sustainable deer populations for the enjoyment of current and future generations.

Yours in Conservation,



Mark Ryckman
Senior Wildlife Biologist

MR/jb

cc: OFAH Board of Directors
OFAH Big Game Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
OFAH Fish and Wildlife Staff