

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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July 25, 2017

Public Input Coordinator
Wildlife Section
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 013-0487 – Amendments to Ontario Regulation 665/98 (Hunting) and Ontario Regulation 664/98 (Fish Licensing) made under the Fish and Wildlife Conservation Act to support the development of Ontario's hunting and fishing licensing system

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 appreciate the opportunity to comment on this detailed proposal, as it will affect every one of our members and the entire hunting and fishing community. The posting contained many different proposals, with some being fundamental changes to the licensing system. The posting itself was not detailed enough to provide the full rationale, intent, and implementation plans for the proposal, and has resulted in widespread concerns and uncertainty within the fishing and hunting community. This illustrates the limitations of using the EBR as the primary consultative tool for complex policy proposals. The MNR should limit its reliance on the EBR, and must invest in alternative or supplementary means to engage the fishing and hunting community. The MNR participated in OFAH online videos and attended OFAH member club-hosted events to help explain the proposals. We applaud the MNR for taking these steps to engage our community beyond the EBR, and encourage them to look for ways to build in this type of meaningful consultation to future proposals.

With additional dialogue and explanation from the MNR, our understanding of the proposal and its implementation has increased significantly during recent months. We are pleased to see that many of our initial concerns have been or will be addressed, but anglers and hunters have raised additional questions through this consultation that must be fully considered and addressed before moving forward. We look forward to working with the MNR to finalize the numerous uncertainties that remain regarding the practical aspects of these changes.

General Comments

The OFAH is generally supportive of the proposed changes. Renewing and updating the licensing administration system should increase administrative efficiency and identify cost savings, which will allow the province to dedicate a greater proportion of our fishing and hunting licence dollars to the management of game species and their habitats. In the early days of our current licensing system, the OFAH was actively engaged with the Licensing and Client Services Section of the MNR to identify problems and communicate the concerns of frustrated anglers and hunters. We expect that, at a minimum, the new licensing system will address the issues that we identified previously.

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The OFAH communicates with thousands of anglers and hunters every year, but despite this level of engagement, we do not know how much support or opposition exists for several aspects of this proposal. As such, it is critical for the MNRF to gather input and information directly from anglers and hunters, in addition to input gathered through the Environmental Registry. **We encourage the government to continue to engage anglers and hunters directly through focus groups and open houses.** The new licensing system will not be fully implemented until late 2018 or early 2019, which should provide plenty of time to engage the outdoors community. Angler and hunter input will be valuable as this proposal evolves and the government finalizes the technical aspects of the new licensing system.

Ontarians currently pay some of the highest prices for fishing and hunting licences compared to other Canadian jurisdictions. A few years ago, the Ontario government imposed an additional \$2 service fee on all transactions to cover the administrative cost of the transaction, and to minimize the impact of administrative fees on the Special Purpose Account (SPA). A new licensing system is being adopted, in part, to reduce costs and minimize impact on the SPA. If system costs are reduced, anglers and hunters will question the need to maintain the \$2 service fee, and will likely seek a reduction or complete elimination of the fee. Service continues to decline at an unacceptable rate, while licensing costs have increased with little to no justification provided to the public. Without a commitment to enhance fishing and hunting opportunities, the perpetuation of this service fee will be viewed by many as an unnecessary money grab. Estimated cost savings should be communicated to the public, and the benefits to fish and wildlife conservation should be demonstrated clearly.

Outdoors Card and Licensing Modernization

We fully support the creation of a single Outdoors Card, as it will streamline card issuance and reduce administrative costs. However, without a means to differentiate between cards, how will a conservation officer be able to quickly determine the type of hunting accreditation that a hunter possesses? Also, how will existing holders of three-year Outdoors Cards be phased-in to the new system?

We also support the government's goal of minimizing the number of unique licence/tag formats in circulation and the amount of paperwork that a hunter must carry while hunting. Ideally, most of a hunter's information would be carried on their Outdoors Card; we hope that this new iteration of our licensing system is the first step towards this reality. While we support the concept of a licence summary that can be reprinted at will and free of charge, the hunting community has serious concerns about the durability of a licence summary that is printed on plain paper. We encourage enforcement staff to employ discretion for a brief period after implementation to give hunters a chance to adapt their habits to the requirements of the new system.

Hunters have also voiced concern about privacy and the security of personal information as a result of the amount and type of identifying information listed on a Licence Summary. If an angler or hunter loses the Licence Summary, will their personal information be at risk? We encourage the MNRF to consider this concern carefully when designing the Licence Summary.

Game Seal Modernization

Currently, hunting licences, tags, and game seals come in a variety of formats depending on species being hunted, where the product is purchased, and whether or not they are received through a draw. The proposed changes will increase consistency by creating a single standard type of licence summary and game tag, and should minimize the number of products that a hunter must carry on his/her person while hunting. We are also pleased to see that these changes will increase the number of licence products that are available online (currently, online purchase is not an option for black bear, wolf/coyote game seals, fall turkey licence and game seal, dog licence, or elk).

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These improvements notwithstanding, the proposed changes to game seals is a radical departure from our current system and the hunting community will likely need some time to adapt to it. Considerable uncertainty remains about the practical aspects of printing, carrying, notching, and affixing tags under the proposed new regulations. Currently, instructions for legally notching and attaching game seals are printed directly on the licence/seal - will this continue in the new licensing system? If not, it could result in hunters being in violation of the tagging requirements. This will require a concerted communication effort by the MNRF, the Ontario Hunter Education Program, and groups like the OFAH to ensure that hunters understand these changes and any new requirements.

Hunters have also voiced their concern about potential abuse of a self-printing tag system. What security features will the new system include to prevent duplication of tags? We also have outstanding questions about the practical use of self-printed tags. How will tags be notched in inclement weather without damage? If a Licence Summary gets stained by blood smears or dirt, can the QR code still be scanned by a conservation officer? If a QR code cannot be scanned, how will conservation officers deal with these situations?

The MNRF must also provide clear instructions describing when an animal must be tagged. If consistent direction is not provided by the MNRF, hunters may find themselves accidentally in contravention of the law and the responsibility for providing clarity will fall on provincial court judges to make these types of decisions. Seeking clarification through the court system would present an unacceptable burden on hunters, the government, and our provincial court system.

Hunter-Harvest Reporting Modernization

We fully recognize, and are concerned, that reporting rates have been steadily declining for several years, and are now so low in some areas that their utility is questionable. The OFAH insists that wildlife management decisions be science-based, which requires reliable information. We also know that the MNRF is withholding moose hunting opportunities in several WMUs because low reporting rates have resulted in unreliable moose harvest estimates. With increased reporting rates, we expect to see these hunting opportunities provided to licensed hunters in the future.

The OFAH believes that reporting rates are declining, in part, because the MNRF does a poor job of communicating the importance of hunter activity and harvest information and how it is used. Lack of feedback from the government contributes directly to hunter complacency low reporting rates. The MNRF must renew their efforts to communicate the importance of hunter harvest information, and must commit to reporting back to hunters in a timely fashion. For example, 2016 black bear harvest information was not available publicly until July 2017. This extended delay is indefensible and could contribute to complacency among hunters if they begin to question if/how the information is being used. The combination of a new licensing system and mandatory reporting should enable immediate analysis of harvest information and timely reporting of results to hunters, as is seen in most jurisdictions in North America. It should also increase the utility of the information by minimizing non-response bias.

The elimination of reporting via mail is a significant concern. We concede that postcard surveys are a costly method of collecting information, but there are many hunters who will not or cannot report online or via telephone for various reasons. The MNRF must devise a method of reporting that accommodates this small subset of hunters without creating an unnecessary burden on MNRF staff. Postcard surveys also serve as a reminder for many hunters. Given that administrative penalties will be applied for non-response, we encourage the MNRF to provide hunters with multiple options for reporting.

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Based on our conversations with the hunting community, many licensed hunters support mandatory reporting, as long as it does not preclude other population monitoring methods. However, support for mandatory reporting is contingent on increased efforts by the MNR to obtain harvest information from indigenous communities. We recognize that the MNR has no jurisdiction to enforce mandatory reporting on indigenous communities, but we hope that by implementing mandatory reporting for licensed hunters, it can be used to encourage indigenous harvesters to take a more active role in provincial wildlife management by reporting their harvest. Ultimately, indigenous and non-indigenous hunters share common goals – the conservation of our valuable wildlife populations as a top priority, and sustainable hunting opportunities where possible.

We do not oppose the implementation of a deadline for reporting – if reporting is mandatory for all licensed hunters, it is logical to also impose a deadline for reporting. However, we encourage the MNR to communicate the deadlines for all species on an annual basis in the Hunting Regulations Summary, online, and through social media. The OFAH is also willing to communicate these deadlines through our communication vehicles. We are optimistic that this new proposed deadline will also reduce the turnaround time required to report harvest results back to the hunting community.

Finally, if the MNR insists on penalizing hunters for not submitting their harvest reports, we recommend that a phase-in approach be used to give hunters an opportunity to adapt to the new requirements without incurring administrative penalties. Unfortunately, the Environmental Registry proposal and attached explanatory documents do not contain sufficient detail about the penalties for non-reporting, and the MNR is not soliciting public feedback on different penalty structures. These details would have been helpful for commenters.

Hunter Apprenticeship Program Modernization

We fully support this change, as it will streamline and simplify the requirements for apprentice hunters. The OFAH was instrumental in the creation of the Hunter Apprenticeship Safety Program, which provides newly trained young hunters with exposure to hunting under the direct supervision of a qualified mentor. The program is tremendously valuable, and barriers to participation should be removed wherever possible to encourage participation and recruitment of hunters into the community. The OFAH has been advocating for changes to the apprentice hunter program for several years, and we are pleased to see that our recommendations are being adopted. This change should greatly increase the appeal of the apprenticeship program for both apprentices and mentors, resulting in more opportunities for apprentice hunters to hunt under their own licences and tags. However, if this change is adopted, it is not clear to us what documentation an apprentice hunter would need to carry aside from their Outdoors Card, which would identify them as an apprentice hunter. It is not practical to require apprentice hunters to carry paperwork from their firearms examination, as this document can be very difficult to replace if lost. We assume that the new and improved Outdoors Card (when swiped by a conservation officer) will be able to identify whether the hunter is permitted to hunt with a gun (e.g. information incorporated in Licence Summary QR code or the apprentice's Outdoors Card).

Hunter Accreditation Streamlining

Currently, many North American jurisdictions recognize hunter education qualifications from other jurisdictions that maintain similar training requirements. We support this aspect of the proposal, as it will eliminate duplicate training requirements for hunters.

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Hunting Dog Licensing

We support the creation of a single dog licence. The use of dogs for the purposes of hunting is a time-honoured tradition, and this change will streamline licensing requirements for hunters that employ dogs for hunting of multiple species. However, we have serious concerns about the requirement for a separate dog licence for each dog used; currently, raccoon hunters only have to purchase a single dog licence that applies to all of the dogs that they use for hunting raccoon at night. Why will raccoon hunters now have to purchase a separate licence for each dog? Unlike the use of dogs for hunting deer or bears (which is optional), it is mandatory to use dogs when hunting raccoons at night. To our knowledge, there is no justification for this change, which could pose a significant barrier to participation. The MNRF should be encouraging participation in raccoon hunting by *removing* barriers, rather than erecting new ones. Please provide us with justification for this change.

Licensing Requirements to Hunt on a Game Bird Hunting Preserve

We support the elimination of the Small Game Licence requirement for resident hunters hunting on a game bird preserve, as well as the addition of Gray Partridge to the list of eligible game bird species that can be hunted on a game bird hunting preserve. Game bird hunting preserves provide valuable recreational hunting opportunities and can serve as training grounds for hunting dogs.

Deemed Residency for Acquiring a Recreational Fishing Licence

We support this amendment, as it provides greater consistency between jurisdictions and between hunting and fishing licensing requirements to the benefit of Canadian soldiers and members of the RCMP.

Non-Canadian Youth Fishing at Organized Camps

This is important to recognize the opportunities presented to non-resident youth. There is tremendous value in exposing children to fishing in a safe and organized environment, even if the youth is not a Canadian resident. Experiences such as this during a person's formative years can stimulate a life-long interest in fishing, the outdoors, and in conservation, which has positive implications for angler recruitment. No sustainability concerns due to the small number of these opportunities.

In closing, thank you for engaging the OFAH in discussions about the Licensing System. We appreciate the early discussions and the opportunity to provide input on this proposal. We look forward to continued involvement as the new licensing system and any outstanding details are finalized.

Yours in Conservation,



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