Canadian Wildlife Service  
Email: ec.scf-oismiggibiers-cws-miggamebirds.ec@canada.ca

Dear Sir/Madam:

Subject: Proposals to amend the Canadian Migratory Birds Regulations, December 2017

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 Proposals to Amend the Canadian Migratory Birds Regulations, December 2017 and submit these comments for consideration.

American Black Ducks  
Based on harvest results from the Ontario Mourning Dove Hunting Season Report, we support the proposal to implement the liberal regulatory package under the American Black Duck International Harvest Strategy for the 2018-2019 and 2019-2020 seasons. Higher bag limits and the addition of 17 days to the season will be welcomed by duck hunters, and will contribute to the goal of achieving harvest parity between the US and Canada.

OFAH members in the Northern District have expressed an interest in establishing a mourning dove hunt in areas where birds are relatively abundant, such as the lesser clay belt. We acknowledge this is out of scope for the current proposals, but would like to continue discussions with the Canadian Wildlife Service about abundance and range estimates for Northern Ontario, population objectives, and other considerations necessary for establishing a mourning dove hunt in the Northern District.

Mourning Doves  
We support lengthening the mourning dove season in Ontario. Since the implementation of a mourning dove hunt in Ontario, the OFAH has been asking for an earlier season opener to allow families to participate in this hunt during the Labour Day weekend and before youth go back to school. This is a very positive change that will be welcomed by hunters. The number of dove hunters in Ontario is declining, as is the overall dove harvest. Hunters in Ontario are not filling their bag limits and the current level of harvest is well within sustainable limits. A fixed opening date will provide clarity and predictability in season timing, and the longer season will provide additional hunting opportunities to dove hunters.

Canada Geese  
In advance of the proposal to implement a fixed opening date for Canada Geese in Central District (September 1), the OFAH polled goose hunters about this proposed change, and the majority of respondents were supportive of shifting the goose season earlier. We acknowledge that this will require closing the season on December 16 to remain within the maximum allowable days.

We also recognize that increasing goose populations in parts of the Northern District are contributing to increased human-wildlife conflicts, an issue that necessitates additional management attention. Increasing the daily bag limit for Canada and Cackling Geese during the early goose season in WMUs 8, 10, 13, 37, 39, and 41 will help address the increasing number of conflicts.
American Woodcock
The proposal to synchronize woodcock open season dates with ruffed grouse seasons has merit. The loss of 14 days at the end of the season in the Hudson-James Bay District will have little to no impact on hunters, as data suggests that most woodcock have migrated before then. However, some hunters in the Northern District have argued that the woodcock season should open earlier, on the same day as snipe. Can you please clarify the reasoning behind the current season timing?

In addition to the proposed hunting regulation changes addressed above, we look forward to future discussions on the modernization the Migratory Birds Regulations to address several concerns that the OFAH has expressed recently, as well as exploring the possibility of a sandhill crane hunt in parts of Ontario.

Thank you for considering our concerns.

Yours in Conservation,

Mark Ryckman
Manager of Policy

MR/gh

cc: OFAH Board of Directors
OFAH Migratory Birds/Wetlands Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff