

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

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Email: ec.reglementsfaune-wildliferegulations.ec@canada.ca

Ms. Caroline Ladanowski, Director
Wildlife Management and Regulatory Affairs Division
Canadian Wildlife Service
Environment and Climate Change Canada
351 St. Joseph Boulevard, 16th Floor
Gatineau, Quebec
K1A 0H3

Dear Caroline:

Subject: Proposed service fees for the Migratory Game Bird Hunting Permit and Canadian Wildlife Habitat Conservation Stamp.

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 *Proposed Service Fees for the Migratory Game Bird Hunting Permit and Canadian Wildlife Habitat Conservation Stamp*. The OFAH has supported previous proposals to increase funding for wetland and migratory bird conservation through increases to the cost of the Canadian Wildlife Habitat Conservation Stamp as recommended by the Hunting and Angling Advisory Panel in December 2014. Waterfowl hunters play a critical role in the management and conservation of Ontario's natural resources. We have two key questions we feel must be answered before the proposed increases can be fully considered.

Has the CWS considered the impact of these fee increases on recruitment and retention of migratory game bird hunters? What steps are being taken to mitigate this?

We are concerned that the proposed changes to the Migratory Game Bird Hunting Permit and the Conservation Stamp represent a large increase over a short time period, and may have a negative impact on hunter recruitment and retention. We acknowledge that if the fees had been increased with inflation, the current cost would be \$27.66 and closely mirror the proposed increased fee (\$28); however, the average migratory bird hunter will only notice the final cost of their licensing fees.

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In order to hunt migratory game birds in Ontario, hunters must purchase a small game licence (\$25.72), the Migratory Game Bird Hunting Permit (\$8.50), and the Canadian Wildlife Habitat Conservation Stamp (\$8.50). Taking into account the cost of an Ontario Outdoors Card, processing fees, and taxes, the total cost under the current system is \$39.92 in provincial fees and \$19.21 in federal fees for a total of \$59.13. This makes it one of the most expensive resident hunting licences in Ontario. With the proposed fee increases, the federal component of the fees will increase to \$31.64 for a new total of \$71.56. The costs increase further if the hunter wishes to have a stamp mailed to them following an online purchase (\$2 fee, total equals \$73.56) or obtain a physical permit from a vendor (\$5 fee, total equals \$76.56). The majority of hunters do not hunt migratory birds exclusively – most purchase licences for a number of other species including deer, moose, bear, and turkeys. The cost of these licences is cumulative and any cost increase could force hunters to choose between which species they hunt.

For several years, the number of migratory bird hunters has been in decline, a trend that may be exacerbated by the proposed fee increases. Fewer hunters ultimately results in less money available for the conservation and management of migratory birds and wetland habitats. We are concerned that the CWS has not adequately considered the implications of this. Table 2 in the proposal accounts for a one percent decline in the number of permits purchased as a result of the increased fees. However, the proposal also cites a study (Harshaw, 2017) which found that only 83 percent of surveyed hunters would buy the stamp and permit at a combined cost of \$25. Based on this, we are concerned that the one percent decline in hunter numbers used by the CWS may be an underestimate. A significant decline in waterfowl hunter numbers could offset or erase any increased revenues from the new licence fee structure, ultimately reducing the total amount of funding available for waterfowl management.

Does the CWS intend to reduce or eliminate public funding from the Migratory Game Bird Program and make hunters cover the entire cost through increased fees?

The proposal includes the following statement: *“The Migratory Game Bird Hunting Permit program provides unique services to a select group of individuals. Buying a Migratory Game Bird Hunting Permit and an affixed Conservation Stamp provides these individuals the benefit of a sustainable hunt of listed migratory birds and conserves migratory bird habitat to sustain hunting activities. As such, program costs should be covered by those who benefit directly from the services (i.e., hunters), and not the general taxpayer, in line with the intent of the new Service Fees Act.”*

The OFAH interprets the above statement as an intention to reduce/eliminate general taxpayer contributions from the Migratory Game Bird Program and increase hunting fees to cover the entire cost (or at least the majority) of the program. According to Table 2 of the proposal, fees from the permit contribute 36 percent of the core costs and 27 percent of the total costs of the Migratory Game Bird Hunting Permit program. This will rise to 76 percent of core costs and 56 percent of total costs by 2021 under the proposed increases. Our interpretation is that this confirms a plan to reduce the contribution of general taxpayer revenue to the program. The OFAH wants to ensure that non-consumptive users and the general public continue to contribute to migratory bird and wetland conservation.

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Through both the Canadian Wildlife Conservation Stamp and the Migratory Game Bird Hunting Permit, waterfowl hunters contribute to the broader societal benefits associated with healthy wetlands and the management of migratory bird species. The benefits of healthy wetlands include water filtration, flood control, carbon sequestration, reduced soil erosion, the control of invasive species, and the support of diverse ecosystems including many species at risk. The activities funded through the permit support the management and conservation of both game and non-game species of migratory birds and promotes biodiversity on a continental scale. For example, Environment and Climate Change Canada employs increased hunter harvest through liberalized hunting regulations of Canada and Cackling Geese as a method of reducing human-Canada/Cackling Goose conflict. It is therefore, unacceptable to make hunters carry the full cost of the Migratory Game Bird Program, as suggested in the CWS proposal.

Hunters have demonstrated they are willing to carry their fair share, and more, of the costs of waterfowl conservation, but any increased contribution on their part would be expected to result in additional management and conservation benefit, rather than maintenance of the status quo.

We wish to recognize and applaud the Canadian Wildlife Service for writing a very detailed pre-consultation document. We also appreciate this multi-stage consultation process that allows for preliminary consultation results to inform the final regulatory proposal. This level of transparency greatly facilitates discussion and allows for an efficient dialogue between stakeholders and the government.

Yours in Conservation,



Keith Munro, M.Sc.
Wildlife Biologist

KM/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