

# 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](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

OFAH FILE: 400K/461  
October 25, 2018

Honourable Ernie Hardeman  
Minister of Agriculture, Food, and Rural Affairs  
77 Grenville Street, 11<sup>th</sup> Floor  
Toronto, Ontario  
M7A 1B3

Dear Minister:

**SUBJECT: Chronic Wasting Disease (CWD)**

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we are compelled to reach out regarding the discovery of CWD in captive red deer in Quebec. Your ministry, in conjunction with the Ministry of Natural Resources and Forestry, holds the responsibility for safeguarding Ontario's cervid populations from the looming threat of CWD. We respectfully request that the Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) take action to safeguard our wildlife, our economy, and our hunting heritage.

The OFAH defines conservation as “the protection, use and management of natural resources to supply benefits at optimal sustainable levels for present and future generations of Canadians.” The recent case of CWD in Quebec, a mere 15 kilometers from the border with Eastern Ontario, represents a major threat to this goal. There are decisive steps that you can take as the Minister of Agriculture, Food, and Rural Affairs to prevent this threat from becoming a reality.

**We request that OMAFRA immediately take steps to effectively regulate (in cooperation with the MNRF) the transport of live captive cervids into and through Ontario.** The spread of CWD has been closely linked to the deer farming industry, with the movement of infected (but asymptomatic) animals spreading the disease between farms where it then spreads to wildlife (or directly to wild cervids from escaped captive animals). This scenario has been repeated over and over again across North America. The agent that causes CWD, a misfolded protein known as a prion, can survive on hard surfaces for extended periods of time, meaning that there is a risk not only from infected animals, but also from the equipment used to transport them. There is no effective way to sterilize this equipment as prions are resistant to chemicals, radiation, freezing and even incineration at more than 600 degrees Celsius.

Section 30.1 of Ontario Regulation 666/98 (*Possession, Buying and Selling Wildlife*) prevents a person from transporting a farmed cervid unless they are granted a permit by the MNRF following specific conditions and input from OMAFRA. However, this regulation only covers cervids that are native to Ontario (white-tailed deer, American elk, moose, and caribou). The effectiveness of this regulation to prevent the spread of CWD is severely hampered by the fact that, according to the Agriculture and Agri-Food Canada, 63 percent of the cervids farmed in Ontario are non-native European red deer and are, therefore, not included in this regulation. **We request that OMAFRA work in collaboration with the MNRF to amend Section 30.1 of Ontario Regulation 666/98 to replace the list of cervids in that section with the statement “all members of the family *Cervidae* and their hybrids.”** This will give the MNRF the ability to regulate the movement of all cervids into and through the province and restrict it when needed, such as in a period of high CWD concern.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Honourable Ernie Hardeman  
October 25, 2018  
Page Two

The OFAH has long been a vocal opponent of the deer farming industry and has been formally calling for its elimination since 1991 on the grounds that they present a demonstrable risk to Ontario's wildlife. Contact through fencing, unintentional escapes, and intentional releases mean that there is no reliable separation between farmed animals and wildlife. This creates the risk of genetic intermixing, the establishment of feral populations of non-native wildlife (e.g. red deer herd in North Bay District), and the transmission of diseases including CWD. **Therefore, the OFAH requests that OMAFRA phase out the practice of deer farming over a five-year period, with adequate compensation to farmers.** During this phase-out period, we urge OMAFRA (in cooperation with the MNR and the Canadian Food Inspection Agency as required) to immediately introduce regulations to minimize the risk of disease spread between farmed and wild free-ranging deer including, but not limited to, mandatory double fencing standards, restrictions on the intra-provincial transport of farmed cervids, and mandatory CWD testing of all slaughtered farmed cervids.

Chronic Wasting Disease is a major threat to Ontario's deer, moose, elk, and caribou populations. Healthy populations of these species are integral to maintaining the province's biodiversity, wildlife viewing opportunities, our hunting heritage and our identity as Ontarians. CWD has the potential to reduce hunter participation and thereby threaten our hunting heritage. This loss of hunter participation, coupled with the staggering costs of managing wildlife populations with CWD, holds the potential to have severe negative effects on Ontario's economy. OMAFRA can take decisive steps now to safeguard against this risk and protect the interests of the people of Ontario.

Yours in Conservation,



Matt DeMille, M.Sc.  
Manager, Fish & Wildlife Services

MD/gh

cc: Honourable Jeff Yurek, Minister of Natural Resources and Forestry  
OFAH Board of Director  
OFAH Big Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Mark Ryckman, OFAH Manager of Policy  
Keith Munro, OFAH Wildlife Biologist  
Lauren Tonelli, OFAH Resource Management Specialist