

# 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/452  
October 25, 2018

Honourable Jeff Yurek  
Minister of Natural Resources and Forestry  
99 Wellesley Street West  
Whitney Block, 6<sup>th</sup> Floor, Room 6630  
Toronto, Ontario  
M7A 1W3

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 Agriculture, Food, and Rural Affairs (OMAFRA), holds the responsibility for safeguarding Ontario's cervid populations from the looming threat of CWD. We respectfully request that the Ministry of Natural Resources and Forestry (MNRF) take immediate 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 Natural Resources and Forestry to prevent this threat from becoming a reality.

**Specifically, we request that the MNRF immediately take steps to effectively regulate 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 played out over and over again across much of 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 the MNRF work in collaboration with OMAFRA 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 Jeff Yurek  
October 25, 2018  
Page Two

Escaped farmed cervids are a major risk to Ontario's native wildlife. Wherever deer farming occurs, farmed animals are invariably intentionally released or accidentally escape. This creates the risk of genetic intermixing between farmed and wild individuals, the establishment of feral populations, and the transmission of disease, including CWD. The recent escape of an elk from a farm near Newcastle, Ontario is a prime example. This animal was loose on the landscape for over two weeks and travelled more than 40 kilometres. The OFAH fully supports the MNRF's resolution of the situation and wish that this level of decisiveness had been taken in the past. Failures to take such actions have resulted in the establishment of feral populations of European red deer in North Bay and in the United Counties of Prescott and Russell. This latter population is currently complicating the planned CWD surveillance in WMU 65.

The OFAH has long been a vocal supporter of the MNRF's Chronic Wasting Disease Surveillance Program and hunters play a crucial role by providing the overwhelming bulk of samples through regulated harvest. It is our understanding that the *Ontario Chronic Wasting Disease Surveillance and Response Plan* is being revised to reflect new knowledge and recent experiences with CWD in other jurisdictions. **We request that the revised policy include clear operational plans for both surveillance and response if a case of CWD is detected, and that adequate staff and budget are put in place to allow for a rapid response to new and emerging situations.**

The OFAH fully supports your ministry's decision to conduct additional CWD surveillance in WMU 65 in 2018. In recognition of the importance of this additional surveillance, the OFAH has contributed over 400 hunter-orange hats, which will be provided to successful hunters who submit samples to the MNRF's mobile surveillance teams. However, surveillance cannot prevent CWD from appearing in Ontario – it will simply confirm that we failed to take proactive measures to protect our wild cervid populations.

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. MNRF can take decisive steps now to safeguard against this risk and protect the interests of the people of Ontario.

We look forward to hearing from you.

Yours in Conservation,



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

MD/gh

cc: Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
OFAH Board of Directors  
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