

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 407  
November 2, 2018

**Email: [christie.curley@ontario.ca](mailto:christie.curley@ontario.ca)**

Ms. Christie Curley, Manager  
Wildlife Section, Policy Division  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, Ontario  
K9J 8M5

Dear Christie:

**Subject: Proposal for an open calf moose season in the bows-only season and to establish separate archery moose tag allocations where they do not currently exist.**

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we respectfully request that the Ministry of Natural Resources and Forestry (MNR) amend the moose hunting regulations to return calf hunting to the bows-only season, and establish separate archery moose tag allocations in wildlife management units (WMU) where they do not currently exist. Bowhunting for moose is an Ontario tradition that is highly valued for the distinctly different experience it offers compared to the gun hunt. Bowhunters cite the peacefulness of the earlier season, the quieter woods with fewer hunters, and the increased challenge as the key factors attracting them to this style of hunting. The prohibition on calf hunting during the bows-only season implemented in 2015 severely limited these hunting opportunities, a situation compounded by the ongoing reductions in the number of adult moose validation tags. This is especially true in wildlife management units without separate allocations for the bow and gun seasons. If a bowhunter does not draw an adult tag or is not part of a successful group, he or she is completely excluded from their preferred moose hunt for that year.

We recognize that calf hunting is a complicated and contentious issue in Ontario. However, due to the unique nature of bowhunting for moose, this is an opportunity to maximize hunting opportunities with a negligible increase in calf harvest. Prior to its cancellation, calf harvest during the bows-only season was historically very low with only 20 to 40 calves harvested annually across the entire province. Given this low harvest, the prohibition on calf hunting during the bows-only season was never justified on the grounds of harvest sustainability. Based on WMUs with existing bow calf validation tags (WMUs 48, 55A, 55B, and 57), the success rate for bowhunting calves is very low at approximately two percent or less (from five-year average tag fill rates provided by the MNR).

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Many WMUs do not have separate moose harvest/tag allocations for gun and bow seasons, a situation that is ideal for neither gun nor bow hunters. Combining all applicants into a single draw creates uncertainty around the allocation of tags between the two seasons. Due to the random nature of the moose tag draw, 100 percent of the allocation could conceivably go to gun or bow hunters and exclude the other group from moose hunting entirely. Additionally, these methods typically have different tag fill rates, a critical piece of information used to translate total allowable harvest into adult tag allocations. Creating a separate allocation could increase hunting opportunities, as the total allowable harvest allocated to a bows-only season may result in more available tags due to the lower success rates associated with this hunt.

Returning calf harvest to the bows-only season and establishing separate archery allocations where they do not currently exist restores lost bowhunting opportunities without posing a risk to the sustainability of the local moose population. At a time when moose hunting participation is in sharp decline, we see this as a chance for the MNR to re-engage with hunters while clearly stating that ensuring sustainable moose hunting opportunities is an MNR priority.

Yours in Conservation,



Mark Ryckman, M.Sc.  
Manager of Policy

MR/gh

cc: OFAH Board of Directors  
OFAH Big Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Manager, Fish & Wildlife Services  
OFAH Fish & Wildlife Staff