

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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December 19, 2018

Public Input Coordinator
Species Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough ON
K9J 8M5

Dear Public Input Coordinator:

Subject: ERO Number 013-4124: Proposal to establish a hunting season for double-crested cormorants in Ontario

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 proposal to establish a hunting season for double-crested cormorants in Ontario and submit the following comments for consideration.

General Comments

The OFAH has been advocating for the management of overabundant cormorant populations for over a decade. The ecological damages caused by densely populated cormorant colonies are well-documented, and we commend the government for acknowledging the issue and proposing action.

It must be acknowledged that associating cormorant control with regulated hunting has the potential to negatively affect the image of hunting; indeed, evidence of this is already emerging. A key part of the OFAH mandate is to promote a positive image of hunting as an important component of conservation. It must remain clear that this proposal is not to provide new hunting opportunities, but rather its sole purpose is to use hunters to assist in the control of overabundant cormorant populations. A simple way to avoid this association would be to add double-crested cormorants to the list of species in Section 5(2) of the *Fish and Wildlife Conservation Act*. Combined with an accessible system to distribute depredation permits in areas where the public cannot discharge firearms, this would enable effective cormorant control without negative impacts on the image of hunting. However, if the government is unwilling to consider this route, then we support the proposal with exceptions.

Other stakeholder groups have voiced their opposition to the proposal on various grounds, including the potential for conflicts between hunters and other outdoor recreationists during the summer months, and the risk of orphaning young cormorants. These risks are low and exaggerated by opponents to cormorant control, but could be reduced even further by making some key changes to the proposal.

If the government decides to proceed with the implementation of a regulated cormorant hunt, we ask that you consider the following changes to the proposal in order to mitigate some of the social concerns being voiced without significant effect on the expected management outcomes.

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Season Dates

Consideration should be given to closing the season during the majority of nesting and peak summer outdoor recreational activity until the beginning of other waterfowl seasons. This could occur by splitting the season into two separate parts (March to May, and September to December). This option, if properly implemented, would help address some of the opposition from other stakeholders. Killing adult cormorants in the summer will remove individual birds, but those birds will likely have already bred and caused tree and vegetation degradation. Targeting the season to pre-nesting, when the birds first arrive in the spring, would prevent them from nesting in the first place and limit their impact before it occurs.

Permitting spring and fall hunting would better align with the migration times of cormorants as they move north in early spring through May and move south in October through November (UW Sea Grant 2007). There is precedent for a split season – this approach is already being implemented by the federal government in their control of overabundant snow goose populations. In Ontario a special conservation harvest period is in place for overabundant snow geese from March 1 to May 31, and is in addition to the regular fall season from September to December. Despite this spring season, and similar spring seasons in Quebec, the overall population of snow geese has remained relatively stable, indicating that there is no population-level concern with having these two seasons with a high daily limit (20 birds a day with no possession limit and 50 a day in the Hudson-James Bay area) (CWS 2017). A similar season structure could be implemented for cormorants to reverse population growth while not posing a conservation concern.

Closing the spring season at the end of May would have the additional benefit of removing the need for the proposed exception relating to Northern and Central Ontario’s June to August small game licence restrictions. This would further align the cormorant regulations with other game birds, minimizing confusion. Additionally, as cormorants typically breed between April and August, this spring hunting season would remove most adult birds before they get a chance to lay eggs (Ward 2000) and prevent the orphaning of chicks. For the reasons stated above, the OFAH recommends season dates of March 1 to May 31 and September 15 to December 31.

Population Monitoring

It is essential to get robust data on cormorant populations and distributions in Ontario, including accurate baseline data, in order to inform a provincial management plan. It is encouraging to see the addition of the monitoring plan in the proposal, but it is important to ensure this monitoring covers the entirety of the province, not just the Great Lakes region. A significant concern regarding growing cormorant populations is their expansion to inland lakes and their potential impacts (e.g. sensitive Brook Trout lakes). Understanding their current distribution and relative abundance will ensure we are preventing them from expanding into more vulnerable lake systems. This information can be used to alter bag and possession limits in the future if the population changes significantly.

In addition to population and distributions, it would be beneficial for the government to test and monitor toxin loads within cormorants. Studies have shown that PCB contamination is a concern for cormorants in Ontario, and that it varies geographically (Bishop et al 2016). As such, a consumability study should be developed for the province in a similar way as the Guide to Eating Ontario Fish. This would also be a beneficial way to monitor the health of the cormorant colonies.

Best Management Practices

Since the government is looking to utilize hunters as a management tool to control cormorant numbers, they need to work with the OFAH to give hunters the information needed to implement control effectively and efficiently. The OFAH would like to work with the MNRF to develop outreach materials for hunters. These best management practices could include the proper disposal of carcasses and how to avoid conflicts with other users. Most conflicts can be easily avoided, but if they are not, it can lead to unintended consequences like negativity towards hunting in general or specific issues like discharge bylaws that will hinder cormorant control efforts and hunting opportunities for other species.

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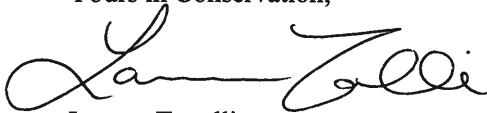
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Provincial Management Plan

This proposal would give individuals the ability to participate in cormorant control on Crown land; however, the province also needs to control cormorant overabundance, particularly when and where hunting will not be permitted. Currently, control measures can be undertaken by municipalities, provincial parks, and landowners when they experience property damage from cormorants. In many areas, no control measures are taken. In other areas, control efforts are too small in scale or focus on ineffective non-lethal actions. In practice these measures are not adequately controlling cormorant overabundance. Even where large scale control is taking place, cormorant numbers are increasing. For example, the Toronto Region Conservation Authority (TRCA) is undertaking non-lethal control of cormorants in Tommy Thompson Park on Toronto's waterfront with a specific focus of decreasing tree damage. Their efforts have successfully reduced tree nesting by 44% from 2008 to 2016, but in doing so, increased ground nesting by 899% (McDonald et al 2018). This has allowed the population to increase from 6,717 nests to 14,515 nests in the same 8-year span (TRCA 2018). Additionally, the Ontario Government is not effectively managing colonies on public properties. Presqu'ile Provincial Park implemented lethal management of cormorants between 2003 and 2006, which reduced the number of nests from 12,082 to 3,855; however, the lethal management was canceled in 2011 and nest numbers increased to 5,425 by 2015. In the absence of continued lethal control, cormorant numbers increase. This showcases the importance of lethal control in managing overabundance of cormorants and the need for landowners to implement that control. Without a holistic province-wide management plan, there will still be areas that are negatively impacted by overabundant cormorant colonies.

The OFAH appreciates the opportunity to comment on the proposed hunting season for double-crested cormorants. Thank you for considering our concerns and recommendations.

Yours in Conservation,



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LT/jb

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

References

Bishop, C. A., Trudeau, S., Janz, D., & Hughes, K. D. (2016). Contaminant concentrations and biomarkers in 21-day old Herring Gulls (*Larus argentatus*) and Double-crested Cormorants (*Phalacrocorax auritus*) from eastern Lake Ontario, and from Hamilton Harbour in western Lake Ontario in 1989 and 1990. *Aquatic ecosystem health & management*, 19(2), 181-191.

Canadian Wildlife Service Waterfowl Committee. (2017). Population Status of Migratory Game Birds in Canada: November 2017. CWS Migratory Birds Regulatory Report Number 49.

McDonald, K., Toninger, R., Chreston, A., Feldmann, I. R., & Fraser, G. S. (2018). Living with Double-Crested Cormorants (*Phalacrocorax auritus*): A Spatial Approach for Non-Lethal Management in Toronto, Canada. *Waterbirds*, 41(2), 208-220.

Toronto and Region Conservation Authority. (2018). Tommy Thompson Park Double-crested Cormorant Management Report 2018.

UW Sea Grant. (2007). Double-crested Cormorant — Migration (On-line). *Migratory Birds of the Great Lakes*. Accessed December 7, 2018 at http://seagrant.wisc.edu/birds/Cormorant_migration.html

Ward, E. (2000). *Phalacrocorax auritus* (On-line). *Animal Diversity Web*. Accessed December 12, 2018 at https://animaldiversity.org/accounts/Phalacrocorax_auritus/