

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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To Whom It May Concern:

SUBJECT: ERO # 019-0405 - Proposed changes to moose management as part of the Moose Management Review

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization, representing 100,000 members, supporters, and subscribers, and 740 member clubs. We have reviewed the **Proposed changes to moose management as part of the Moose Management Review** and submit the following comments for consideration. Moose hunters have been voicing their dissatisfaction with the current system and advocating for change for years. We appreciate the Ministry of Natural Resources and Forestry (MNRF) prioritizing this review.

Moose are the premier big game animal in the province and are hunted across most of Ontario's landmass. Moose hunters come from a wide range of backgrounds and traditions and employ a variety of moose hunting techniques. Therefore, the proposed changes to moose management will impact different hunters in different ways. As the voice of hunters in Ontario, it is the responsibility of the OFAH to ensure that the thoughts and concerns of all moose hunters are heard and considered as part of the Moose Management Review. If the proposed changes to moose hunting are adopted, the OFAH expects to be involved in the development and implementation process to ensure that the final system is hunter-friendly, results in increased hunting opportunities and benefits to moose populations, and does not present any barriers to participation.

Communication

We fully agree with the Big Game Management Advisory Committee's (BGMAC) position that clear and widespread communication is of utmost importance. Much of the dissatisfaction among moose hunters stems from a misunderstanding about the system that is currently in place. Without a coordinated effort to educate hunters on these changes and how they will be affected specifically, this misunderstanding will persist, resulting in a moose hunter population that is no more satisfied than it currently is even if the changes are ultimately positive. This communication challenge is further exacerbated by the fact that the changes to moose hunting will be coming on the heels of the implementation of the new licensing system, which has resulted in a significant amount of confusion and dissatisfaction among hunters (with specific issues related to the big game draws).

While it is the responsibility of the hunter to be informed, the MNRF has a responsibility to ensure that they are communicating through mechanisms that effectively reach their intended audiences. As pointed out in the BGMAC report and supported by our own experience, many hunters rely almost exclusively on the Hunting Regulations Summary (HRS) for MNRF-published information. We strongly recommend that the MNRF make the HRS the foundation of all communication strategies around the proposed changes to moose hunting. Additional moose information could be added to the summary in its current format or all moose-related information could be printed separately as a stand-alone supplement containing regulations, seasons, draw information, and any changes or updates. This would also be an ideal vehicle for the MNRF to share information on hunter point histories, assuming the preference point system is implemented as proposed. We see several advantages with this approach. First, it would eliminate the need to delay publishing the HRS until after the moose tags quotas were finalized. Second, it would shorten the overall length of the summary, recognizing that not all hunters in Ontario hunt moose. Finally, it would provide the MNRF with a dedicated communications vehicle to engage moose hunters and refer them to when questions arise. It would be the responsibility of the MNRF to ensure that the summary/supplement is readily available to hunters, including as a hardcopy, recognizing that many hunters do not own or even use a computer. Reducing misunderstandings and addressing the lack of awareness will dramatically improve hunter satisfaction and smooth the implementation of any changes to moose hunting in the province.

New bowhunting seasons and quotas

The OFAH continuously advocates for additional sustainable moose hunting opportunities, whether for guns, bows, or muzzle-loaders. In 2018, we pushed for the creation of separate archery tag allocations in Wildlife Management Units (WMU) where they currently do not exist, so we are pleased to see this included in the proposal. We also advocated for expanding the open calf season to the bows-only season due to the historically low harvest of calves by bowhunters. While bowhunting of calves would be possible under the new selective harvest approach and the opportunity likely welcomed by bowhunters, we do have concerns about that approach that we outline in the following section of this submission. Furthermore, we ask that the MNRF closely examine the timing of any new seasons in order to ensure that the dates allow for the greatest participation in the new hunting opportunities.

The amount of support among moose hunters for creating separate bowhunting seasons and quotas where they do not currently exist is directly tied to their preferred hunting method. Gun hunters have serious and legitimate concerns about the loss of even a few gun tags, especially in WMUs where tags have been reduced in recent years. This is balanced with the increasing demand by bowhunters for new opportunities and the ability to create more hunting opportunities per allocated animal due to the lower tag fill rates associated with bowhunting. Care should be taken to prevent creating additional conflict between subsets of the moose hunting community.

This proposal should benefit both groups of hunters. By reallocating relatively few animals from the gun hunt to the bow hunt, hunting opportunities will increase overall. We can also reasonably expect some gun hunters to convert to bowhunting in order to take advantage of these new opportunities, and this should reduce competition for the remaining gun tags. One OFAH member's suggestion to motivate gun hunters to convert to bowhunting would be to allow bows-only tags to be used during all moose seasons, provided the hunter is using bowhunting equipment. This would maintain the lower tag fill rates associated with bowhunting while providing the major enticement of more days afield. Safety concerns would be negated by the existing requirement for bowhunters to wear hunter orange during an ongoing big game gun season and enforcement would be feasible due to the distinctive difference in wound channels arising from guns, bows, and crossbows.

As with all aspects of the proposed changes, the MNRF's efficacy at communicating the new bowhunting opportunities and their overall benefits will determine their acceptance by hunters.

Calf harvest controls and the new selective harvest approach

The core of the new selective harvest approach is the establishment of a province-wide calf validation tag (CVT) system in 2021 and interim measures in some WMUs in 2020. Therefore, we feel that it is appropriate to address these two proposed changes together.

The low likelihood of a bull tag holder choosing to use that tag to harvest a calf and the existing ability to tag a calf with a cow tag means that those specific changes will not have a large impact on the moose hunting community. However, the subject of calf hunting is a polarizing issue among moose hunters. Some moose hunters have loudly called for a provincial moratorium on calf hunting due to perceived sustainability challenges and personal hunting ethics, while others oppose restrictions due to lost hunting opportunities. In reality, the current calf hunting system is likely resulting in unsustainable harvest in some WMUs and no conservation concerns in others. Past efforts by the MNRF to address calf harvest through reduced seasons lengths were only temporarily successful and have led to a high degree of dissatisfaction among hunters who question the logic of being allowed to harvest a cow but not the accompanying calf. High calf harvest (in some WMUs it comprises 70-100% of the total allowable harvest) has resulted in limited adult hunting opportunities and the risk of overharvest, especially in those WMUs identified in the proposal as candidates for the 2020 calf harvest restrictions.

The implementation of calf validation tags in WMUs 48, 55A, 55B and 57 has displaced the calf harvest into neighbouring WMUs and the proposed 2020 measures will almost certainly have the same effect in Central Ontario. Rather than the MNRF continuing to implement calf validation tags in an *ad hoc* manner, there is logic in establishing calf validation tags provincially to prevent this displacement of harvest from occurring and new calf-related problems from arising. However, we have significant concerns that without clear calf quota setting guidelines, calf harvest and hunting opportunity will be unnecessarily restricted, especially given the lack of consistency in moose management between MNRF regions. While the MNRF has committed to working with BGMAC to establish guidelines under the proposed selective harvest system, those guidelines do not exist as part of this consultation process and, therefore, the manner in which the provincial CVT will be implemented cannot be fully assessed. Furthermore, the MNRF lacks crucial data on variables such as calf hunting participation and tag fill rates that will be needed to accurately set calf tag quotas. Acknowledging that there are WMUs where concerns about calf harvest will require immediate action, we recommend that if the MNRF does implement a province-wide CVT, they do so in a conservative fashion. This would allow crucial data to be collected and ensure that hunting opportunities are not unnecessarily restricted, while addressing sustainability concerns where they arise. There are WMUs where there is no concern with unsustainable calf harvest and where restricting calf harvest would not significantly increase adult hunting opportunities. In these WMUs, applicant success rate in the CVT allocation process should be set at 100% for a three-year period, which is the minimum time period the MNRF uses to assess factors such as harvest and tag fill rate. This would allow the MNRF to collect the data needed for setting calf harvest quotas and ensure that the new selective harvest approach is based on a solid scientific foundation. In reality, the WMU-specific nature of the CVT will almost certainly restrict calf harvest on its own as hunters are no longer able to hunt calves across multiple WMUs. If the allocation of calf tags is unnecessarily restricted below 100% upon implementation in 2021, the MNRF would lose the opportunity to identify which of these two competing factors (geographic restriction in harvest or restriction in allocated tags) was responsible for limiting calf harvest.

We are also concerned that the new selective harvest approach will limit wolf and coyote hunting opportunities by requiring hunters to apply for a moose tag even if they have no intention to hunt for moose. The Hunting Regulations Summary states that *“hunters wishing to use a centre-fire rifle to hunt wolf or coyote during the seasons for a big game species (other than bows-only seasons for deer south of the French and Mattawa rivers) must have a valid licence for the relevant big game season.”* We assume that the vast majority of wolf and coyote hunters use centre-fire rifles and under the proposed changes all tags will be distributed through the allocation process; therefore, being unsuccessful in the moose allocation would likely mean a hunter cannot hunt wolves for a significant portion of the fall in Northern Ontario. We have explained these concerns in more detail in our submission to **ERO 019-0406 Proposed changes to wolf and coyote hunting regulations in Northern Ontario**.

Implementing a selective harvest approach that includes calf validation tags will significantly limit hunting opportunities, especially for those hunters who hunt alone and/or in areas with high hunter:tag ratios. While hunters are conservationists and will accept restrictions in order to address real concerns about sustainability, it is the responsibility of the MNRF to ensure that hunter opportunities are not restricted more than is required to address these concerns. Furthermore, the MNRF must ensure that the expected benefit of additional adult hunting opportunities arising from the CVT is fully realized for hunters. In the past, moose hunters have accepted restrictions based on the promise of future adult hunting opportunities that never materialized.

Moose hunting licence and separate product pricing

The creation of a separate moose hunting licence that would allow a hunter to party hunt on another hunter's tag is absolutely essential if the MNRF chooses to implement the new selective harvest approach. For decades, a calf tag has accompanied every resident moose licence. The fact that a calf tag is no longer included will need to be very clearly communicated by the MNRF to avoid the inadvertent harvest of calves in 2021 by hunters who are unaware of the change.

The proposal to make the application fee, moose hunting licence, and tags separate products with individual pricing will address concerns voiced by many hunters about having to pay the full licence cost year after year with no success in the current adult tag draw. Conversely, many hunters have raised concerns about moose hunting becoming a sport "for the rich" or about the potential loss of revenue to the MNRF's Special Purpose Account and, therefore, less resources available for moose management. The exact fee structure is not included in the proposed changes, making it impossible to weigh these concerns. However, recognizing that the revenue from licence sales funds wildlife management in the province, any fee structure imposed should be carefully examined to ensure that it does not create financial barriers to participation in moose hunting.

Preference point system

The proposed preference point system has generally positive support from moose hunters. Many have expressed support because it would address one of the major points of frustration of the current two pool random draw - the fact that some hunters receive adult tags more frequently through random chance. Moving to a preference point system resolves this by ensuring that no hunter applying for a specific tag in each WMU receives that tag twice before every other hunter receives it once. This system also provides greater certainty about when a hunter is likely to receive a tag. However, this certainty in timing has also been seen as a negative by some hunters, especially those in WMUs where the hunter:tag ratio for preferred tags is high. Hunters have interpreted this to mean that they are guaranteed to not receive a tag for years. They feel that this will cause older hunters to stop hunting under the belief that they will never receive another tag in their lifetime and be a barrier to new hunters who think they will have to wait decades for a tag. These concerns will be somewhat offset by additional adult hunting opportunities created under the new selective harvest approach and the ability to associate with tags held by other moose hunters, but this is a very real concern of hunters that will need to be directly addressed by the MNRF should this change proceed. In reality, the perceived unlikelihood of receiving an adult tag in many WMUs under the current system is a major contributing factor to declining moose hunting participation over the past 5-10 years. We do support the random allocation component of the second chance allocation as it should continue to provide new hunters access to lower demand tags and encourage hunter recruitment. It will also eliminate the need for the surplus tag system.

We are concerned that the proposed two-stage process for allocating tags will be seen by hunters as too complex when many do not fully understand the current system. Some of the proposed mechanisms are not fully explained, making it difficult to assess how the system would function. As repeated throughout this submission, this will require significant communication efforts to ensure that hunters understand both how the system works and know how to apply properly. There were considerable issues with hunters applying to the 2019 moose draw under the new license system and this will likely be magnified as a new allocation process is implemented on top of a new licensing system that is still experiencing growing pains.

One of the main benefits of the current group application system is that it allows hunters to apply together, ensuring that they do not receive more tags than they want and creating a better distribution of tags among hunters. A similar benefit can be achieved under the proposed preference point system and associated allocation process as hunters have the option to either make a null selection (equivalent to the current 99Z option) or choose not to claim a tag they are allocated. However, this requires much more coordination and planning on the part of the hunter and seems contradictory to the goal of making the draw simpler for hunters. While the preference point system removes the random aspect of the allocation and thereby negates the need for hunters to apply as a group to increase their chance of receiving a tag, there remains value in maintaining the group application component from an organizational standpoint. Hunters could choose to apply as a group and if the group member with the highest number of points meets the requirement for the desired tag, that member receives the tag, forfeits their points and all other members are removed from the allocation but still accumulate a point.

Relying on hunters to not claim tags will likely result in high value tags going unallocated as multiple high point members of a hunting party apply to both the primary and second chance allocations and only one member claims a tag. This situation could partially be addressed by emphasizing that hunters who do not wish to receive a tag in a given year, such as in the case of them not being the point leader in their party, should select the null selection; however, this will require additional communication efforts and will likely be only partially successful. Maintaining a group application component is a much simpler way to ensure that tags are being allocated to hunters who will claim them.

Tag transfers

Moose hunters have been expressing concerns about ghost hunters and will largely welcome the proposed restrictions in tag transfers to address this. If the government proceeds with implementing an application fee, tag transfer restrictions are a necessary step. We would oppose any move to eliminate tag transfers entirely as emergencies do happen, especially medical emergencies related to an aging hunter population. Since transfers would only occur in extreme circumstances, we strongly feel that the recipient of the transfer should forfeit their points, rather than the original tag holder. The administration of these tag transfers would be greatly simplified if the MNRF retained a group application component as outlined above.

A potential ancillary benefit of the proposed tag transfer restrictions is that it may convert ghost hunters into actual moose hunters. Based on past application histories, many ghost hunters will likely have competitive point totals. With transfers no longer a feasible option and Ontario's party hunting rules requiring that the tag holder actively participate in the hunt, this could get these hunters into the field. Hunting is an incredibly rewarding and fulfilling experience and many who experience it for the first time are engaged for life.

Party hunting rules

We acknowledge that Ontario has very liberal party hunting rules which may lead to high tag fill rates and fewer tags per allocated animal. However, any restrictions on party hunting must be well supported by scientific evidence demonstrating that they will have the desired effect. As stated earlier, in the past moose hunters in Ontario have accepted restrictions based on the promise of more adult hunting opportunities in the future that never materialized.

Welcomed by some hunters who have concerns over large group sizes, the proposed restrictions on party hunting size has caused serious concern among others, especially among moose hunters who hunt from large, established hunt camps. Many of these camps have more than ten members and their size is often a direct response to the MNRF's incentivising of group hunting through the Guaranteed Group and Large Group Allocation components of the current system. However, our members clearly communicated to us the need to balance two different types of hunting opportunities - by receiving a tag directly versus being associated with another hunter's tag. Restricting hunting party size may increase opportunity through the creation of more tags, but it will also limit opportunity by preventing hunters from hunting as a group, a practice with important traditions beyond the direct act of hunting. Additionally, capping hunting sizes may impede hunter recruitment by limiting the opportunity for existing groups to add new members to their party. The lack of detail about how the restriction would be enforced has caused significant uncertainty among hunters, making it difficult for them to develop an informed opinion. Even questions as basic as "how is hunting party defined?" are unanswerable. Enforcement of the hunting party size restrictions was clearly laid out in the BGMAC report but is absent from the MNRF proposal. Prior to the implementation of any hunting party size restrictions, the MNRF must clearly define and communicate what a hunting party is and how any restrictions would be enforced.

While the MNRF has some evidence that reducing hunting party size will lower tag fill rates, to our knowledge no such data exists to predict the impact of reducing the maximum distance from the tag holder from 5 km to 3 km. Assuming that the tag holder is located in the centre of the party, this reduces the maximum area that can be hunted on a single tag from approximately 79 km² to 28 km². This is a significant reduction and hunters have voiced safety concerns about concentrating hunters into such a small area. If any reduction is adopted, the new maximum distance should be clearly defined in regulation to be "as the crow flies" as there has been some reported inconsistency in the application of the current 5 km limit by conservation officers.

Non-residents hunting opportunities

The OFAH does not have any concerns about the proposed changes to non-resident moose hunting opportunities. Our position remains that resident hunting opportunities must be prioritized over those of non-residents.

General exceptions and special circumstances

There are individual WMUs with unique moose hunting situations that may not integrate well with the proposed changes, such as moose hunting in Bruton and Clyde Townships in Algonquin Park or special opportunities for hunters with lower limb disabilities in WMUs 11B and 65. It is our hope that these unique situations will continue under the new system.

Proposed three-year review

The OFAH fully agrees with BGMAC on the need to review all changes within three years to ensure that they are operating as intended and delivering the expected benefits to both moose and moose hunters in Ontario. This review should include consultation with hunters and all benefits, concerns, and required changes must be clearly communicated.

Additional BGMAC recommendations not covered in the proposed changes

In the ERO posting, the MNRF commits to continue to work with BGMAC and act on their other recommendations. The OFAH intends to hold the MNRF to this promise as the BGMAC report addresses issues that are of vital importance to moose hunters, such as ensuring the protection and creation moose habitat, increased local hunter engagement and consultation, more funding for moose research, addressing concerns about the impact of predation on moose populations, and engaging Indigenous communities as partners in sustainable moose management.

There remain significant challenges in ensuring a sustainable moose population that can provide benefits to the people of Ontario for generations to come. This can only be addressed by considering all factors that influence moose and not solely focussing on licensed hunters. Many aspects of the proposed changes are steps in the right direction, especially with regards to ensuring continued hunter engagement, but there remains much work to be done. The OFAH stands ready as a partner with the MNRF to achieve this.

Thank you for considering these comments.

Yours in Conservation,



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