

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 • Email: ofah@ofah.org

OFAH FILE: 407/411/794
September 26, 2019

Public Input Coordinator
Species Conservation Policy Branch - Wildlife Section
300 Water Street
5th Floor, North tower
Peterborough, ON
K9J 3C7

Dear Sir or Madam:

SUBJECT: ERO 019-0406 Proposed changes to wolf and coyote hunting regulations in Northern Ontario

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization representing 100,000 members, subscribers and supporters, and 740 member clubs. We have reviewed the proposed changes to wolf and coyote hunting regulations in Northern Ontario and submit the following comments for consideration.

General Comments

The OFAH supports the proposed changes to wolf and coyote hunting in Northern Ontario. However, we are disappointed in the wording of the ERO posting stating that these changes are being made to "address hunter concerns about wolf predation on moose." It is true that moose hunters have voiced concerns about the impact of wolves on moose populations, but this sends the wrong message that population management decisions in Ontario are based on emotion rather than science. There are valid, evidence-based reasons to remove existing administrative barriers to wolf and coyote hunting in Northern Ontario and those should have been stated as the reason for these changes. The predation of moose by wolves is not simply a "hunter concern." Wolves can be a significant predator of moose calves (Severud et al., 2019) and their potential impact should not be casually dismissed. Furthermore, the current co-management of wolves and coyotes in Northern Ontario is based on the assumption that hunters cannot differentiate between those two species. The MNR's own research has shown that in areas where the intermediate sized Algonquin wolf is not present, hunters can effectively distinguish between grey wolves and eastern coyotes (Wheeldon and Patterson, 2012). This eliminates the need to manage them as a single species. Finally, there is no conservation concern to wolves or coyotes by liberalizing harvest opportunities. The wolf harvest will likely remain similar because the number of wolves that can be harvested by a hunter (2) has not changed, and coyote populations in Southern Ontario remain high despite allowing open harvest. We encourage the Ministry of Natural Resources and Forestry to adequately explain the use of hunting as a sustainable and scientifically supported tool for population management when seeking public feedback in the future.

Season Dates and Harvest Limits

We fully support the removal of tag requirement for wolves and coyotes in Wildlife Management Units (WMUs) 1-37, but ask that the MNR consider expanding the proposed changes to WMU 38 and the geographic townships in WMU 40 that are north of the southern most boundary of Timiskaming District. Including these areas should maximize opportunities while still ensuring no overlap of potential Algonquin wolf range. The OFAH also fully supports the removal of harvest limits for coyotes (non-native) as this is consistent with Southern Ontario and there is no evidence of any conservation concerns. However, we are concerned that a harvest limit of two wolves may be unnecessarily low. What information was used to determine a sustainable harvest limit of two wolves per hunter per year?

The OFAH questions leaving the wolf season as is, from September 15 to March 31, while having a coyote season that is functionally September 1 to June 15 (due to the small game licence invalidation in Northern Ontario). This creates unnecessary confusion about season dates. Why is there an invalidation period for small game licences in Northern Ontario in the first place? If there is no legitimate rationale for this restriction, the OFAH suggests removing it altogether. This would simplify current hunting regulations, especially with wolf and coyote seasons being opened.

Issues with Firearm Restrictions

We question the utility and fairness of requiring wolf hunters to purchase an appropriate big game licence if they wish to hunt wolves during an open big game season, as is currently the case. To address complications regarding wolf hunting during a big game season the MNRF needs to amend Section 77 of the Hunting Regulations made under the Fish and Wildlife Conservation Act. The regulations, as written, would prevent anyone from using a centre-fire rifle to hunt small game (including wolves and coyotes) during any open big game season. The regulation summary states that hunters are permitted to use a centre-fire rifle for wolves or coyotes during a big game season only if they have a valid licence for the relevant big game species. Even if the wording in Section 77 is amended to reflect the regulation summary and the intent of the original regulation, it would still place unnecessary restrictions on wolf and coyote hunters. In the worst-case scenario this could mean that if a wolf hunter wishes to use a centre-fire rifle to hunt wolves from August 15 to December 15, they would have to purchase a bear licence and a moose licence, as would be the case in WMU 21A/B. This could be further complicated if automatic calf tags cease to exist (under the proposed changes to moose hunting), as simply purchasing a moose licence would no longer automatically allow a hunter to hunt a moose. This could mean that to hunt wolves during a moose season, the hunter would need to be successful in the moose draw. The OFAH recommends that the MNRF amend Section 77 to reflect what is in the Hunting Regulation Summary, allowing hunters to use centre-fire rifles for small game if they are in the possession of a big game licence. We also suggest that the MNRF look into the extent that wolf hunters are negatively impacted by this requirement to determine if that restriction should be removed for wolf hunting entirely.

Thank you for considering our concerns and recommendations. We look forward to continuing to work with MNRF on improving wolf and coyote management in Ontario and re-evaluating Central Ontario restrictions once the Recovery Strategy for Algonquin Wolves is finalized.

Yours in Conservation,



Keith Munro
Wildlife Biologist

KM/jb

cc: OFAH Board of Directors
OF AH Big Game Advisory Committee
OF AH Small Game Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OF AH Fish and Wildlife Policy Staff

References

Severud, W. J., Obermoller, T. R., Delgiudice, G. D., & Fieberg, J. R. (2019). Survival and cause-specific mortality of moose calves in northeastern Minnesota. *The Journal of Wildlife Management*, 83(5), 1131-1142.
Wheeldon, T. J., & Paterson, B. R. (2012). Genetic and morphological differentiation of wolves (*Canis lupus*) and coyotes (*Canis latrans*) in northeastern Ontario. *Canadian Journal of Zoology*, 90, 1221 – 1230.