

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

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Ms. Caroline Ladanowski
Canadian Wildlife Services
Environment and Climate Change Canada
351 Saint-Joseph Boulevard, 16th Floor
Gatineau, Quebec
K1A 0H3
ec.scf-oismigibiers-cws-miggamebirds.ec@canada.ca

Dear Caroline:

Subject: Proposal to Amend the Canadian Migratory Birds Regulations, December 2019

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the Proposal to Amend the Canadian Migratory Birds Regulations, December 2019 and submit these comments for consideration.

American Black Duck International Harvest Strategy's Recommendation

We support the proposal to continue implementing the liberal regulatory package under the American Black Duck International Harvest Strategy for the 2020-2021 and 2021-2022 seasons.

Harmonize Possession Limits for Migratory Game Birds Across Ontario

The OFAH agrees with the move to a harmonized approach to possession limits as it has been shown that daily bag limit, season timing and season length are the primary factors that influence harvest levels. Removing possession limits for abundant migratory game birds will reduce enforcement burden and hunter confusion when it comes to determining what level of processing is required to remove a bird from a hunter's possession limit. If the proposal moves forward, the majority of species will only have a daily bag limit, which is a more straightforward regulation to follow and enforce. As there is potential for possession limit to have an impact on species that are a conservation concern, this proposal also allows for the implementation of a standardized possession limit of three times the daily bag limit. This ensures that for a species of concern, there is a more rigorous ability to control harvest. The OFAH believes these changes will be easier to enforce and increase opportunities for hunters while continuing to ensure that harvest of migratory game birds is sustainable.

Harmonize Open Season Dates Among Goose Aggregates in the Northern and Central Hunting Districts

The OFAH supports the harmonization of the goose season dates in Northern and Central Hunting Districts as it would ensure that hunters could take any goose found in a mixed flock at any point in the proposed season of September 1st to December 16th. This would shift the hunting seasons for Snow and Ross' Geese in Northern and Central Hunting Districts earlier to align with Canada and Cackling Geese seasons. Currently, the season for Snow Geese is September 10 to December 24 and the season for Ross's Geese is September 21 to January 4. The OFAH is supportive of this change as no hunting days will be lost and, based on observations from the Cornell Lab of Ornithology's eBird website, there will likely be more opportunity to harvest geese in the proposed earlier season than in the current later season. We do, however, want to remind CWS to ensure that when they harmonize season dates, they are doing it for the betterment of populations objectives or hunting opportunities, and not just to simplify the administration of hunting seasons.

Increase Harvest of Snow Geese and Ross' Geese in the Southern Hunting District

The proposal to increase the length and geographic scope of the harvest of Snow and Ross' Geese will improve the ability to control these overabundant species. Specifically, expanding the spring conservation season to farmland in additional Wildlife Management Units (WMUs) should alleviate some human-geese conflict.

Increase Opportunity to Harvest Canada Geese in Wildlife Management Unit 94 in the Southern Hunting District

While the OFAH is supportive of an increase in the Canada Geese bag limit in WMU 94 from 2 to 3, we are concerned that CWS did not model a 4-bird bag limit to determine if it was sustainable. Given that the 3-bird limit is predicted to result in a harvest level below the harvest plan, we feel that a 4-bird limit should have subsequently been modeled. While we understand that other jurisdictions already have a 3-bird limit, making modeling much simpler, we think that it still would have been worthwhile to model a 4-bird limit to better inform management decisions. This would have either shown that the WMU could support more harvest opportunity or that the 3-bird limit is in fact the best management option. Again, we would caution CWS on implementing management decisions based on administrative reasoning.

Restrictions on the Atlantic Population of Canada Geese in Wildlife Management Unit 65 in the Southern Hunting District

As the 3-year average Atlantic Population (AP) of Canada Geese has dipped below 150,000 breeding pairs, the AP Canada Goose Harvest Strategy indicates that a restrictive harvest package must be implemented. The restrictive package for AP Canada Geese is described as a daily bag limit of no more than 3 birds. As the majority of AP Canada Geese are harvested in WMU 65, the OFAH supports the decreased bag limit as proposed.

Administrative Change to Restriction Dates for the Daily Bag Limit of Canada Geese and Cackling Geese Across Ontario

Due to the nature of how Canada and Cackling Geese are managed in certain WMUs, where the daily bag limit changes based on fixed dates, it has been unpredictable how long seasons would be for any given year. The OFAH supports the proposed move to a set number of days in which the daily bag limit is different. Season lengths when bag limit restrictions are in place will be a set 35 days for all affected WMUs; this proposed change will ensure that the opportunities for hunters are consistent between years. We do, however, encourage CWS to continue to print the actual opening and closing dates of the restricted season in the yearly Summary of Migratory Birds Hunting Regulations to make it easier and more user-friendly for hunters.

Conclusion

In addition to the proposed hunting regulation changes addressed above, we look forward to future discussions with CWS to address several concerns that the OFAH has expressed multiple times in the past, chief among them being the implementation of a Sandhill Crane hunt in Ontario. Currently the Eastern Population (EP) of Sandhill Cranes is above their upper population objective as per the Management Plan for Eastern Population Sandhill Cranes, as well as being hunted in three U.S. jurisdictions. In the U.S., EP Sandhill Cranes are hunted under a permit system to prevent overharvest; however, it is our understanding that a permit system is likely not feasible in Canada at this time. To prevent overharvest of cranes in Ontario, a new hunting season structure should err on the side of caution in terms of bag/possession limits, season length, and geographic scope. Additionally, we are disappointed that Northwestern Ontario doesn't already have a Sandhill Crane hunt in line with the hunt that exists in the prairie provinces for the Mid-Continent Population (MCP) birds. MCP Sandhill Cranes extend across the northwestern extent of Ontario and, as such, the birds that exist there should be managed under Objective C of the Management Guidelines for the Mid-Continent Population of Sandhill Cranes which states to "maximize subsistence and consumptive recreational use consistent with population and distribution objectives," specifically Strategy C-1a which is to "permit hunting opportunities in all areas where MCP cranes regularly occur." Because of this, the OFAH would like to see a scoped pilot hunt for EP Sandhill Cranes and a full hunt in Northwestern Ontario for MCP Sandhill Cranes. The OFAH will continue to raise the issue of an Ontario Sandhill Crane hunt as it is a sustainable opportunity that is being ignored.

Thank you for considering our comments and concerns.

Yours in Conservation,

Lauren Tonelli
Resource Management Specialist

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OFAH Fish and Wildlife Staff