

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

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*Ontario Conservation Centre*

OFAH FILE: 413B/794  
October 5, 2020

Public Input Coordinator  
MNRF Fish and Wildlife Policy Branch – Wildlife Section  
300 Water Street  
5th floor, North Tower  
Peterborough, Ontario  
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Dear Sir or Madam:

Subject: ERO # 019-1806: Proposal to expand the live capture of wild raptors (birds of prey) by licensed falconers

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. The Ontario Hawking Club (OHC) was founded in 1984 and is an OFAH member club. Since that time, the OHC and the OFAH have partnered to protect and enhance the ancient cultural heritage of falconry and Ontario's raptor populations. We have reviewed the proposal and provide the following comments for consideration.

The OHC and the OFAH jointly submitted a proposal in 2019 requesting the Ministry of Natural Resources and Forestry (MNRF) review the current system for wild take of raptors in Ontario. The letter proposed two recommendations: 1) increase the number of wild take permits to fulfill requests; and 2) add Northern Goshawk to the list of species that can be captured. We are pleased to see both of these recommendations included in the proposal.

Removing the permit system ensures equitable access and opportunities for licensed Ontario falconers without having a negative impact on population sustainability. Of the 25 permits issued annually, the capture rate is only 59% on average for Cooper's Hawk, Sharp-shinned Hawk, Red-tailed Hawk, and Merlin combined. Additionally, a portion of the birds that are taken from the wild are released the following spring, leading to a limited impact on the wild population. The current lottery system does not take fill rate or return to the wild into consideration, leading to fewer birds being removed from the population than deemed acceptable. Removal of the permit system poses no risk to population sustainability, but significantly increases the social benefits and removes an administrative burden on the government.

Goshawks are a highly desirable falconry bird as they are ideally suited for Ontario's climate, landscape and quarry. Although the proposed addition of Northern Goshawks is more limited in scope than was recommended in our initial request, the inclusion of this species is positive. In our recommendations, we requested either seven Northern Goshawks without geographic limits, or fifteen Northern Goshawks spread across the province. The proposal recommends five permits, each from a different MNRF District. Restricting wild-take to one Northern Goshawk per MNRF District, up to a maximum of five, is significantly more restrictive than necessary and will unnecessarily limit opportunities for falconers. The OFAH also questions how this system will be implemented. Will falconers have to select a district when they apply to the draw? What happens if the falconers who apply are not spread out between five districts?

This would add a new administrative burden to the permit process. Spreading out the five permits across the province will reduce the availability of Goshawks for falconers that may be in the same district. Given the very low number of permits being considered, the OFAH recommends permits not be restricted to one per district. What is MNRF's concern with allowing all five birds from being taken from the same district? The proposal states that the number may be revised based on new data and assessment of Goshawk populations. Does the MNRF have a framework for how that decision will be made and how often population assessments will be done? We recommend that the MNRF consider the fill rate of wild-take permits for Northern Goshawks when determining how many permits are allocated. If the MNRF considers a five-bird take to be sustainable, then the number of permits should logically be higher to reflect capture success rate.

The OFAH believes that these proposed changes are a good step forward for falconry in Ontario, as they are more closely aligned with the traditional practice of falconry. Liberalizing wild-take permits provides assurance that apprentice falconers have the opportunity to capture and train their first raptor, which is fundamental to the apprenticeship process. Additionally, this change will provide falconers with the ability to release their birds in the fall with the knowledge that they can capture a new wild bird in the spring, as is the tradition. This will result in practically no impact on wild raptor populations and allow falconry to be practiced as it has been for thousands of years.

In addition to the proposed changes, the OFAH recommends that the MNRF reconvene the Provincial Falconry Advisory Committee. This advisory committee should consist of currently relevant stakeholders, and serve as an invaluable source of direction and advice to the government on how to manage falconry-related issues in the future. Potential issues that would be best addressed through this group include transparency in capture and banding data to inform management, the number of wild-captured birds allowed to be possessed at any given time, and changes to Goshawk capture permits moving forward.

The OFAH appreciates the MNRF recognizing the importance of falconry as a heritage hunting tradition in Ontario and making necessary and requested improvements. Thank you for considering our comments.

Yours in Conservation,



Lauren Tonelli  
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors  
OFAH Small Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
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