

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Public Input Coordinator
MNRF Fish and Wildlife Policy Branch
300 Water Street
North Tower, 5th floor
Peterborough, Ontario
K9J 3C7

Dear Sir or Madam:

Subject: ERO # 019-1407 Proposal to reduce regulatory burden within the wildlife management program

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 reduce regulatory burden within the wildlife management program and offer the following comments for consideration.

Streamlining fur dealer records submissions

The OFAH agrees with streamlining processes and reducing unnecessary administrative burdens so long as there are no negative impacts on the resource and that the Ministry of Natural Resources and Forestry (MNRF) can maintain adequate oversight. We believe that allowing licensed fur dealers to submit transaction records electronically to the MNRF without needing to get prior written permission is a logical regulatory change that will prevent unnecessary staff time devoted to providing written permission. Additionally, we see no issue with changing the submission of these reports to annually so long as the MNRF allocates sufficient time to review these reports annually.

Enabling persons to hold both a trapping licence and fur dealer's licence

The proposal seeks to remove the prohibition on holding both a trapping licence and a fur dealer's licence. The OFAH understands that the purpose of the current restriction is to prevent the intermixing of pelts from licensed trapping and fur dealing activities. Keeping these two types of fur separate is important to ensure that farmed furs are not passed off as wild furs and to prevent overharvested wild furs from being disguised as farmed furs. Currently, under Section 15 of O. Reg. 667/98 under the *Fish and Wildlife Conservation Act (FWCA)*, the MNRF can grant individuals the ability to hold both licences if there is adequate record-keeping and measures to reduce the chance that farmed pelts and trapped pelts intermix. It is our opinion that as long as the measures required in the current exception remain in place, then there will be adequate protection against the mixing of pelts. If the MNRF could previously assess an individual's ability to keep furs separate, we are confident that they can continue to do so if the current prohibition is removed.

Enabling the use of firearms at night for dispatch of trapped furbearers

The OFAH recognizes the intent and agrees with allowing trappers to dispatch furbearers outside of the current legal shooting times, as the goal for any trapper is to be able to dispatch the animal as quickly and humanely as possible. We believe that the safety concerns around dispatching a trapped animal at night is minimal. The OFAH would like to ensure that the wording in regulation specifies that this activity is restricted to dispatching animals that are caught in a certified trap. Trappers are permitted to hunt furbearers under the authority of a trapping licence and we want to prevent any regulation change that may inadvertently permit trappers to do so at night. We question why this regulation change is being restricted to rim-fire rifles. Trappers can obtain authorization to carry certain handguns, the use of which would not be permitted at night due to the use of the term "rifle" in regulation. The safety concerns with using a rim-fire rifle and a rim-fire handgun would be equally low. While we understand that the MNRF is attempting to align this regulation change with a change to nighttime raccoon hunting, we feel that they are separate activities and that trappers should not be unnecessarily restricted for the sake of alignment.

Related to the concept of aligning the regulations surrounding the use of firearms at night, the MNRF is proposing that all rim-fire rifles also be permitted for use during nighttime raccoon hunting. By expanding the list of allowed cartridges beyond those currently allowed under Section 80 of O. Reg. 665/98 (.22 short, .22 long or .22 long rifle) to include all rim-fire cartridges, hunters would be permitted to use rifles of significantly greater muzzle energy. The OFAH assumes that the MNRF has considered this and views it as a negligible safety concern, but we wanted to bring it to your attention to ensure that there are no unintended consequences.

Exempting airports from obtaining a deer removal authorization

The OFAH disagrees that airports should be exempt from the requirement to obtain authorization prior to harassing, capturing, or killing white-tailed deer or American elk in protection of property. Ontario's deer populations are currently at or below objectives across much of the province and a recent survey of Ontario's largest elk herd found it to be smaller than previously thought, leading to a significant reduction in the number of hunting tags available in 2020. Simply put, now is not the time to remove the MNRF's oversight of what could be a significant source of mortality, especially for the province's small elk population. We recognize the need for deer and elk removals from airports as a tool for ensuring public safety; however, if the current process is administratively burdensome for airports, this should be rectified by improving the internal government processes rather than by eliminating the process entirely.

It is our understanding that the number of removal authorizations issued each year is low, but this is not a valid reason for eliminating them. There is nothing to guarantee that the killing of deer and elk at airports would not increase once there was no longer any government scrutiny of the justification for the removals and no reporting requirements. This situation is especially concerning for American elk. The OFAH, MNRF, hunters, and other partners invested heavily in the reintroduction of elk into Ontario. To this day, elk numbers remain low and concentrated in several small herds scattered across the province. The small size of these herds means that the removal of a few animals by an airport could have significant impacts on the population, especially the removal of adult females due to elk's matrilineal nature.

One of the reasons that deer removal authorizations are a necessary public safety tool for airports is that the buffer areas around many airports support high deer densities and do not allow hunting. This exclusion of hunters, who are the main tool for maintaining socially sustainable deer populations across North America, is due to the false assumption that hunting is not feasible on airport properties. This is simply not the case as deer hunting, with necessary oversight, takes place in high-security areas across Canada, including many Department of National Defence operated bases. In particular, the urban bowhunting strategies operating in municipalities including Thunder Bay and Shuniah could be easily adapted to the buffer areas around airports. This would have a financial benefit as well since hunting is a revenue-generating activity as opposed to professional deer removal, which can incur high costs per animal killed. The OFAH strongly recommends that the MNRF explore this possibility with the appropriate federal agencies. We would welcome the opportunity to assist in that conversation in any way we can.

The OFAH understands and supports the need to streamline and improve regulatory processes to ensure efficient wildlife management; however, these changes should never come before the conservation of the resource. Thank you for your consideration of our comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
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