

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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To Whom It May Concern:

Subject: Improving hunter reporting compliance through financial penalties

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 change to the *Fish and Wildlife Conservation Act, 1997* proposed under the *Supporting Recovery and Competitiveness Act, 2021*. We support the proposed change as we feel it will have benefits to wildlife management and hunting in Ontario. Should the proposed changes be enacted, the MNRF will be expected to levy these penalties when necessary, to ensure that the information required for effective wildlife management is collected.

The OFAH has been a vocal proponent of mandatory reporting due to the demonstrable benefits it can have to wildlife management and sustainable hunting opportunities. By increasing response rates, mandatory reporting increases the quality of the hunter reporting data, which in turn allows for wildlife management decisions to be based on more accurate assessments of the current conditions, pressures, and population statuses. Since the implementation of mandatory reporting in 2019, we have seen a significant improvement in reporting rates. Comparing between 2018 and 2020, response rates have improved for deer (42% to 86%), moose (51% to 85%), spring black bear (54% to 75%), fall black bear (69% to 78%), elk (71% to 88%), spring wild turkey (69% to 82%), fall wild turkey (76% to 80%), and wolves and coyotes where a tag is required (57% to 86%). These numbers show that most hunters are completing the reports and now the onus is on the MNRF to ensure that this information is utilized as fully as possible to inform wildlife management decisions.

As is true for any mandatory activity, there will always be individuals who do not comply for a variety of reasons. Along with education, penalties play an important role in ensuring compliance. Recognizing that there exists a spectrum of non-compliance (e.g., the hunter who misses one report vs. the hunter who never reports across multiple species), a spectrum of penalties is also needed. It is our understanding that currently the only two penalty options for failing to report are having a conservation officer deliver a ticket to the hunter or preventing the hunter from purchasing the licence the following year. The former option is bureaucratically onerous and the latter, while certainly appropriate at times, may be too harsh a penalty for some situations. Adding the ability to administer an administrative penalty provides a good mid-spectrum option.

We recommend that the MNRF consult with human dimensions scientists to identify a penalty amount or amounts that are sufficient to increase compliance without creating a financial barrier to participation. Simply put, we don't want a cost that is so low it becomes viewed as an alternative to reporting, but at the same time not so high that some hunters may not be able to afford it and are thereby prevented from hunting, effectively enacting the harshest non-reporting penalty. A tiered penalties approach may be an effective way to address this, using escalating penalties with ongoing non-compliance.

Thank you for the opportunity to provide comment on these proposed changes.

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Keith Munro". The signature is fluid and cursive, written in a professional style.

Keith Munro, PhD
Wildlife Biologist

KM/jb

cc: OFAH Board of Directors
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