

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)



*Ontario Conservation Centre*

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Public Input Coordinator  
NDMNRF - FWPB - Wildlife Section  
300 Water Street  
5th Floor, North Tower  
Peterborough, Ontario  
K9J 3C7

To Whom It May Concern:

Subject: ERO 019-4637 Proposal to simplify and align provincial white-tailed deer hunting seasons

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. White-tailed deer are ecologically, economically, culturally, and socially important to Ontario. Approximately 190,000 hunters participate in Ontario's deer seasons each year and do so for a variety of reasons including time with family, practicing long-standing traditions, engaging with nature, and obtaining healthy meat while contributing an estimated \$346.5 million to Ontario's economy annually (Hunt et al., 2021). At the same time, these hunters help maintain deer populations at sustainable levels and monitor for wildlife disease threats such as chronic wasting disease. We are pleased to see deer receive the management attention they deserve. We have reviewed the proposed changes and offer the following comments to ensure that any changes to deer seasons are reflective of the desires of deer hunters and support sustainable hunting opportunities.

## *Consultation*

The proposed changes to Ontario's deer seasons are extensive, both in the types of changes (the creation of new seasons, the extension and shifting of existing seasons, and changing the allowed firearm types) as well as geographic scope (affecting over forty wildlife management units [WMU]). Each of these changes will interact with the specific hunting practices, traditions, preferences, experiences, and socio-economic constraints of hunters in these individual WMUs. In areas where a high proportion of the landscape is privately owned, the views, attitudes, and preferences of landowners, including farmers, will also play a role in the implementation of these changes.

This proposal contains good ideas that we feel have the potential to increase deer hunting opportunities and have a net benefit to hunters. These ideas should be explored but that must be done at a time and in a manner that allows for deer hunters across Ontario to provide meaningful input. The required level of input may not be feasible given the timing of the current consultation period, as it occurs after many of the deer seasons in the province have ended and overlaps the holiday season. This limits the ability of both the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) and the OFAH to raise awareness of the consultation opportunity among deer hunters, especially those who do not use a computer, or a mobile device connected to the internet. This in turn limits the potential for this consultation to adequately receive feedback from the deer hunting community on these proposed changes or hear of other desired changes not included in the current version of the proposal.

The extent to which the NDMNRF was able to successfully engage with deer hunters will ultimately be reflected in the number of comments received through the Environmental Registry of Ontario, information that will not be available to the OFAH until after a decision notice has been posted. As such, prior to making a decision on the implementation of any of the proposed changes, the onus is on the NDMNRF to ask the following question and carefully consider the response: “Have we adequately captured the feedback from hunters related to these specific changes?” If the answer to this question is anything less than an unqualified “yes,” we recommend conducting additional consultation prior to adopting some of these proposed changes. To reiterate, the proposal does contain some good ideas that the OFAH would like to see explored but fulsome engagement of the broader deer hunting community, and landowners where appropriate, is necessary.

#### *Sustainability and effective deer management*

The proposal states that the anticipated environmental consequences are neutral but does not provide any further details to support this statement. We recognize that the allocation of antlerless validation tags is the primary tool used to control the size and growth of a white-tailed deer population and that this proposal does not alter that. However, season timing, season length, and firearm type can influence the rate at which those tags are filled. As such these changes have at least the potential to alter harvest, especially in WMUs where new seasons are being added or existing seasons are being significantly expanded-shifted. This could manifest as either an overharvest (undesirable from a sustainability perspective) or an underharvest (undesirable from a population control perspective). The potential impact of these changes on harvest should be evaluated using a combination of deer population trends and mandatory hunter reporting data. This analysis should be aided by the fact that many of these changes are meant to bring WMUs in line with their neighbours. As a result, harvest data from those neighbouring WMUs should be able to provide insight into the outcomes of these changes.

#### *Specific proposed changes*

Since the posting of this proposal, the OFAH has received a significant number of comments from our members and the broader deer hunting community. These comments have clearly demonstrated a diversity of opinions among deer hunters, even within a given WMU, with some comments supporting proposed changes that are opposed by others. Due to the issues of timing identified above, we have not been able to receive comprehensive feedback from our members, but the wide range of opinions was immediately evident. It is the OFAH’s policy to foster additional deer hunting opportunities wherever possible, provided that the new opportunities are sustainable, acceptable to local hunters, and result in a net benefit. Given the timing of the consultation process, this level of local support is not something we have been able to accurately assess.

Where deer hunting seasons are being extended into periods where hunting does not currently occur, the OFAH is supportive of this change provided that no undesirable changes to overall harvest are expected to occur.

We also support new deer seasons being created for WMUs where deer hunting does not currently occur in order to ensure low deer densities in support of moose management. The expansion of deer into moose range represents a conservation concern, including the ability of deer to spread the parasite *Parelaphostrongylus tenuis*, commonly known as brainworm, which causes severe and often fatal neurological symptoms in moose. In conjunction with these new seasons, we recommend the appropriate allocation of antlerless validation tags and additional deer tags for these WMUs to keep deer densities at a level that mitigates any negative impacts on moose populations.

Where changes are being proposed within existing hunting seasons, our above stated concerns about achieving effective and representative consultation apply. These changes represent trade-offs between different hunting methods and traditions; for example, extending gun hunting by one or two days into periods that are currently bows-only or allowing the use of archery equipment during seasons that are currently shotgun and/or muzzleloader-only. As such, the relevant demand for these hunting opportunities, the views of the hunters participating in the existing seasons, and the net impact of these proposed changes on opportunity must be considered in detail. We support bowhunting opportunities during concurrent muzzleloader seasons, but it has to be acceptable and deemed a net benefit to local hunters. We have heard from hunters with differing perspectives on this and, therefore, these changes necessitate that the NDMNRF conduct detailed and extensive consultation with local hunters and, in areas with a significant proportion of private land, landowners must also be directly engaged.

We question the need to extend the deer seasons further on the privately-owned islands of WMUs 83B and 83C. In general, the OFAH does not support the preferential allocation of hunting opportunities based on land ownership, except for farmer and landowner-controlled hunt validations due to the specific nature of the controlled deer hunt program. The proposed season extensions on these islands would make these the most liberal deer hunting seasons in Southern Ontario and offer extensive opportunity as a result of land ownership. This runs counter to the spirit of deer management in Ontario, and North America in general. These concerns are compounded by the general lack of readily available information on the deer populations and resulting management challenges on these islands. Without extensive additional information about the situation on these islands, the OFAH is currently not in a position to support this drastic season expansion.

#### *Communication*

Should the NDMNRF decide to proceed with any of the proposed changes, extensive communication efforts will be required to ensure that deer hunters are made aware of these changes. While it is the responsibility of hunters to be aware of all relevant regulations, including season dates and permitted firearm types, the NDMNRF also bears the responsibility of ensuring that it is communicating in a manner that effectively reaches its intended audience. While we acknowledge that the NDMNRF did undertake significant communications efforts to support the changes to moose hunting that were implemented in 2021, there are still many moose hunters who are not aware of or have misconceptions about the changes. Our concern is that if the communication of any adopted changes to deer seasons is not done effectively, deer hunters may find themselves unintentionally in non-compliance situations for hunting activities they have been doing for years, with an additional burden being placed on conservation officers.

#### *Sunday gun hunting*

Proposed change #1 will directly interact with municipal prohibitions on Sunday gun hunting that are in place in WMUs 82A and 82B. By extending the gun season in these WMUs to include the Sunday, the NDMNRF will create a day of deer hunting that exists only on paper for a large proportion of hunters. While those dates will technically be part of the gun season, in municipalities that do not permit Sunday gun hunting, only bowhunters will be able to participate and only if they wear hunter orange. Therefore, due to the presence of municipal prohibitions on Sunday gun hunting, gun hunters won't benefit from this change and bowhunters will be subject to an additional requirement (hunter orange).

While we acknowledge that the decision-making ability around Sunday gun hunting currently rests at the municipal level, there are two key factors we would like to remind the NDMNRF of. First, it was the NDMNRF that originally granted municipalities the ability to make these decisions, so the ministry does hold some responsibility for the existing situation and any phantom gun hunting opportunities that arise. Second, many hunters are not aware of the intricacies of multi-level governmental decision-making and will ultimately just see this as a disconnect between the NDMNRF and the realities of deer hunting.

As a result, we recommend the NDMNRF amend the hunting regulations to allow Sunday gun hunting in all municipalities in Ontario.

#### *Controlled deer hunt review*

Given the interactions between these changes and controlled deer hunts, we feel that this is an appropriate time for the NDMNRF to act on the OFAH's long-standing ask for a review of the controlled deer hunt program to ensure that it is functioning as intended. In no way is this a request to eliminate controlled deer hunts as they can (and in many units do) play an important role in managing hunter densities to the benefit of opportunity. However, given that there has not been a formal review of the controlled deer hunt program since its inception, we feel that this is the appropriate time for a review to occur. It seems counterproductive to institute changes now that may create conflicts as they intersect with controlled deer hunting, in units where the controlled deer hunt may not ultimately be needed as it no longer is fulfilling its intended function.

*Conclusion*

In summary, we recommend that the NDMNRF:

1. Ensure that sufficient consultation has taken place to assess the outcomes of these changes and conduct further consultation if that is not the case.
2. Evaluate any potential environmental consequences of these changes using data from neighbouring WMUs.
3. Proceed with the extensions of deer seasons to dates and WMUs that currently do not have deer hunting but ensure that comprehensive consultation has taken place prior to proceeding with changes that convert existing deer hunting dates from one season to another or make changes to allowed firearm type.
4. Do not proceed with the proposed season extensions in WMUs 83B and 83C until further information justifying the management need for these changes is presented to the public.
5. Ensure that any adopted changes are effectively communicated to deer hunters.
6. Amend the hunting regulations to allow Sunday gun hunting in all municipalities in Ontario.
7. Review the controlled deer hunt program to ensure that it is functioning as intended.

Thank you for the opportunity to submit comments and we are more than willing to support any additional consultation that may be necessary. The OFAH supports sustainable hunting opportunities wherever possible, provided they are acceptable to the hunters who participate in them.

Yours in Conservation,



Keith Munro, Ph.D.  
Wildlife Biologist

KM/jb

cc:     OFAH Board of Directors  
         OFAH Big Game Advisory Committee  
         Angelo Lombardo, OFAH Executive Director  
         Matt DeMille, OFAH Director, Policy & Programs  
         Mark Ryckman, OFAH Manager, Policy  
         OFAH Policy & Programs Staff

References

Hunt, L.M., J.A. Rodgers, C. Godwin, L. Makkinga, C. Mondoux and K.W. Morrison. 2021. Ontario white-tailed deer hunters in 2019: Perspectives, benefits, characteristics, and hunting styles. Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry, Science and Research Branch, Peterborough, ON. Science and Research Technical Report TR-44. 31 p. + appendices.