

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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To Whom It May Concern:

Subject: ERO 019-4970 Strengthening guide requirements for non-resident white-tailed deer hunters in Northern Ontario

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. Historically, high levels of non-resident participation in deer hunting have caused conflict with resident hunters in parts of the province. The OFAH is pleased to see that the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) is looking into this matter. The OFAH's ultimate desire is for a system that reduces or prevents conflict between resident and non-resident hunters, while supporting the economically important tourism industry and ensuring sustainable white-tailed deer populations in the province.

### *History of OFAH involvement*

The OFAH has a long history of involvement in this issue, specifically as it relates to Northwestern Ontario. OFAH representatives participated in the Northwest Ontario Non-Resident Deer Hunter Committee, which convened in 1998 and met many times over the following decade to identify solutions to the issue of increased non-resident deer hunter participation and the ensuing conflict and competition with resident hunters. These representatives, along with staff from the NDMNRF, deer guides, local hunters, and members of the tourism industry, invested considerable effort in this process and it is gratifying to see follow-up action stemming from that investment.

### *Value of and support for the tourism industry*

The OFAH recognizes the important economic contribution of both non-resident hunters and the outdoors tourism industry. We further recognize the challenges that the tourism industry is currently facing. This includes the ongoing COVID-19 pandemic as well as longer term challenges such as the gradual reduction of moose tag allocations to outfitters and the residual effects of the cancellation of the spring bear hunt. We are in favour of measures intended to support this industry provided that they do not result in unsustainable levels of deer harvest or reduce resident hunting opportunities.

From our discussions with tourism industry representatives, we understand that many outfitters are interested in expanding into deer hunting as an additional/replacement revenue stream, especially for lost moose tags. Considering the points above, we support the NDMNRF putting measures in place now to ensure that this expansion can occur without resulting in conflict between residents and non-residents, lost resident hunting opportunities, or unsustainable harvest.

*Concerns related to non-resident deer hunting*

Currently, non-resident deer hunting participation does not exist at the level and geographic scope that previously led to concerns among resident hunters about competition for hunting opportunities, overcrowding (especially on Crown land), safety issues, and uncertainty about the effects of the selective harvest of large bucks. Non-resident deer hunter numbers in the province have declined steeply from a peak around 2007, a decline further hastened by the COVID-19 pandemic.

However, we have seen cycles in non-resident (primarily American) interest in deer hunting in Ontario over the past sixty years. Specific to Northwestern Ontario, these cycles of participation have been driven by long non-resident deer seasons, increases in deer populations, accessible Crown land, the presence of trophy bucks, and advantageous exchange rates between the American and Canadian dollar. Similar to the peak that occurred in the 2000s and spurred the creation of the Northwest Ontario Non-Resident Deer Hunter Committee, high non-resident deer hunter numbers were reported in the mid-1960s and early 1970s and then declined by the early 1980s. Recognizing the cyclical nature of non-resident deer hunting and the myriad factors that drive this, we feel it is prudent to put measures in place now to reduce the chance of future conflict and ensure a sustainable deer harvest. Furthermore, implementing changes when non-resident hunter numbers are low will result in less disruption and resistance than attempting to do so if/when non-resident interest rises significantly.

*Geographic scope of the issue*

It is important to consider geographic scope when discussing issues arising from non-resident deer hunting and applying potential solutions. While the posting refers to Northern Ontario in the title and further allows survey respondents to provide input on Southern Ontario, non-resident deer hunting issues have largely been associated with Northwestern Ontario. According to available deer hunter reporting data, very few non-resident hunters hunt in the northeast, even prior to the COVID-19 pandemic. Although interest is lower than in the northwest, Eastern and Central Ontario are popular destinations for non-resident hunters; however, we have not received reports of significant conflict or concerns.

*Preferred approach and thoughts on a strengthened/expanded guide requirement*

The OFAH's preferred approach is to directly address the root cause of past conflict and impose a system to manage both the number and distribution of non-resident deer hunters and, by extension, the associated harvest by wildlife management unit (WMU). Experience has shown that the presence of non-resident deer hunters is not in itself a cause of widespread conflict, as evidenced by the generally low level of conflict reported following the decline of non-resident deer hunting post-2000s.

We recommend that the NDMNRF explore the feasibility of a controlled deer hunt for non-residents. This type of system could allow for direct control over non-resident hunter numbers and distribution (at the WMU-level) and allow for year-to-year adjustments through the broader deer allocation process. We see this as a targeted approach that would allow for maximum non-resident participation, and the associated economic benefit to the tourism industry and Ontario's communities, while ensuring that conflict and potentially unsustainable harvest is avoided. A non-resident controlled deer hunt could be applied provincially, with allocation set to meet non-resident demand in areas where there is no concern and restricted in areas where necessary. Hand in hand with this is the need to ensure that white-tailed deer populations are monitored with sufficient rigor such that management is adequately informed, sustainable hunting opportunities are maximized, and potential conservation concerns can be identified and proactively addressed.

Recognizing that our preferred option is to investigate a non-resident controlled deer hunt, we do see potential for a strengthened/expanded guide requirement, provided that this system is designed to specifically address the historic concerns related to non-resident deer hunting (competition with residents, overcrowding, safety concerns, and potentially undesirable sex-skewed harvest). Simply expanding the current guide system currently in place in the Territorial District of Rainy River may not be sufficient to address these concerns, which is the OFAH's ultimate desire. For example, requiring guides to undertake mandatory training or demonstrate proficiency based on past deer guiding expertise could ensure that guides have the necessary skills to mitigate common points of conflict where they occur (e.g., Crown vs. private land).

*Possible exemptions to any new non-resident deer hunter requirements*

Should the government decide to make the use of a guide, an outfitter, or outfitter services mandatory for non-resident deer hunters, the NDMNRF will need to think about unintended consequences of that action. If this type of requirement was imposed, then the OFAH would like to see exceptions put in place to allow for non-residents who currently hunt as part of a group with residents to be able to continue doing so. As we have pointed out in past submissions, it is common for people to move out of the province for employment opportunities but still return to hunt with friends and family. We think it is important to support these hunting traditions and bonds. For a non-resident who traditionally hunts with residents, a requirement to hunt through an outfitter or through a guide (depending on the specific requirements around obtaining a guide licence) would end their ability to participate in that tradition.

One option to allow for these mixed non-resident/resident hunting groups to continue to hunt together would be to institute an immediate family member exception as is currently in place for moose and was formerly in place for black bear (note that the OFAH opposed the removal of the special black bear hunting opportunities for non-resident immediate relatives). While limiting this to immediate family members may not fully capture situations where non-residents hunt with residents, it is a mechanism that currently exists in the regulations. Other jurisdictions have their own mechanisms for supporting residents and non-residents hunting together, such as Alberta's Hunter Host system. As a reminder, the OFAH's preferred method is a non-resident controlled deer hunt and we are only suggesting an immediate family member (or similar) exception in the case where the government proceeds with a guide or outfitter requirement.

Has the NDMNRF considered the issue of non-residents who own property in Ontario for the purpose of deer hunting? Similarly, how will the NDMNRF address instances where resident hunters who are members of the RCMP or the Canadian Armed Forces are transferred to a posting in another jurisdiction but wish to continue deer hunting in Ontario? These are just some of the questions that must be addressed before requirements are imposed.

*Chronic wasting disease and the cross-border movement of bait*

While not directly related to the guide requirement, we do wish to raise an issue of concern related to non-resident deer hunting. We are aware of a common practice for non-resident deer hunters to import bait for deer from outside of the province. This importation opens a potential hole in Ontario's otherwise formidable measures to prevent the spread of chronic wasting disease (CWD). CWD's infectious agent, misfolded proteins known as prions, can contaminate plant material and there is no effective way of removing it or testing the plant material prior to transport. Given that this bait may be coming from jurisdictions with CWD, including but not limited to Ontario's neighbours Minnesota and Michigan, we have significant concerns about the potential for CWD introduction into the province through this pathway. Should prion-contaminated feed be brought into Ontario, the risk that deer will encounter it is high. As such, we recommend that the NDMNRF take actions to prohibit or at the very least regulate the importation into Ontario of plant material for the purposes of deer baiting.

Ultimately, we feel that the implementation of any new requirements or regulations related to non-resident deer hunting offers an opportune time to review existing practices through the lens of CWD spread and impose new measures to mitigate any identified risks.

*Conclusions*

We are pleased that the NDMNRF is giving attention to the long-standing and potentially recurring issue of non-resident deer hunting, particularly as it relates to Northwestern Ontario. We look forward to participating in future consultation opportunities with the ultimate goal of a system that enables sustainable and conflict-free deer hunting opportunities of both resident and non-resident hunters while supporting the communities and tourism industry that rely economically on this activity. Thank you for the opportunity to provide comments.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'Keith Munro', written in a cursive style.

Keith Munro, Ph.D.  
Wildlife Biologist

KM/jb

cc: OFAH Board of Directors  
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