

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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April 29, 2022

Public Input Coordinator
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To Whom It May Concern:

Subject: ERO 019-5034 Proposal to align white-tailed deer hunting seasons in wildlife management units 91A-B and 92A-D

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 OFAH prides itself on being the voice of anglers and hunters in Ontario. In some instances, being that voice means presenting a single unified response on a specific topic. At other times, it means advocating to ensure that the diverse opinions of our individual members are heard. It is important that the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) be receptive to the input of deer hunters, and we are pleased to see this proposal in response to comments received through ERO 019-4637 *Proposal to simplify and align provincial white-tailed deer hunting seasons*.

Deer hunting in wildlife management units (WMU) 91A-B and 92A-D is precisely one of those instances where our members hold a wide range of opinions, which precludes the OFAH from taking a position either supporting or opposing this proposal. The OFAH has received significant member input on deer hunting in these units through our staff and board of directors in response to this posting and ERO 019-4637, as well as prior to that. From this feedback it is evident that allowing the use of bows in gun seasons in these units is seen as a positive by some and a negative by others. Our hope is that formal consultation on the proposed addition of bows to all gun seasons will result in an outcome that best aligns with the desires of hunters in those units.

Central to achieving this outcome is ensuring that effective communication and consultation on the proposed changes has occurred. Effectively, were hunters made aware of the opportunity to provide comment and is the NDMNRF confident that the responses received are representative of the hunters that hunt in these units? As we highlighted in our response to ERO 019-4637, changes that appear simple from a legislative point of view, such as amending the regulations to allow the use of bows during gun seasons, become much more complex as they interact with the specific hunting practices, traditions, preferences, experiences, and socio-economic constraints of hunters in the individual WMUs. And as we stated in our previous submission, the onus is on the NDMNRF to honestly gauge if hunters have been sufficiently engaged to capture hunter feedback on the proposed change. If that consultation threshold has not been met, the NDMNRF should conduct additional consultation prior to making a decision on the proposed change.

In support of ensuring that the NDMNRF receives the most representative feedback on the proposed changes, the OFAH has endeavoured to make potentially affected hunters aware of the opportunity to provide comment. We have promoted the ERO posting through social media and sent a targeted email notification to OFAH members in that part of Southwestern Ontario. We hope hunters take this chance to share their thoughts on the proposal.

Thank you for the opportunity to provide comments and as with ERO 019-4637, we are more than happy to participate in any further consultation that may be necessary. We are pleased to see the NDMNRF's continued focus on the management of white-tailed deer as they are an ecologically, economically, culturally, and socially important part of Ontario's natural landscape. Ultimately, we want to see deer seasons in WMUs 91A-B and 92A-D that maximize safe, sustainable, and high-quality deer hunting opportunities. This can be achieved through effective consultation on the part of NDMNRF resulting in an understanding of the social dynamics and hunter motivations in these units.

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
OFAH Big Game Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Director, Policy & Programs
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