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Ministry of Natural Resources| Wildlife Section  
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**SUBJECT:** ERO 025-0761: Proposal to update the province's black bear management approach

The Ontario Federation of Anglers and Hunters Membership (OFAH Membership) is Ontario's largest non-profit, conservation-based organization, representing 100,000 members, subscribers, and supporters, including 670 member clubs. We have reviewed the *draft Black Bear Population Objective Setting and Harvest Management Guidelines* and submit the following comments for consideration.

This response is informed by extensive feedback from hunters (both members and non-members) through membership meetings, the OFAH Big Game Advisory Committee, social media, and numerous emails and phone calls.

The OFAH has spent decades promoting black bears as a valuable game species and an important component of Ontario's biodiversity and encouraging hunters to take up black bear hunting. Ontario's black bear population is healthy and supports significant social, economic, and cultural activities. We are pleased to see the government giving bears the dedicated management attention they deserve.

### **Population Objective Ranges**

We support the development of population objectives as a logical first step to increasing management attention on bears. However, because population objectives will be the catalyst for major harvest management decisions in the future, it is important to ensure we get them right at this stage and build in a review process to facilitate periodic updates based on consultation with hunters, tourist outfitters, municipalities, Indigenous communities, and other stakeholders.

Some of the most relevant and useful feedback on population objective ranges (POR) will come from hunters who actively hunt in those areas. Many hunters hunt in the same areas over the course of many years and can provide important perspectives on population trends, habitat changes, etc. Our comments are limited to the draft PORs for the Bruce Peninsula and Wildlife Management Units (WMUs) 11-13, 35, 38, and 40, as feedback from hunters was focused on these areas.

## WMUs 35, 38, and 40

Bear populations in these units may be low relative to the draft PORs, but we cannot conclude that they are statistically below the lower threshold. However, the MNR intends to base harvest restrictions solely on point estimate, triggering management restrictions even when a population sits one bear below the lower threshold, irrespective of the precision of the point estimate. Given the MNR's history of uneven decision-making, we fear that the same principle won't hold true for populations that are just *above* the POR (i.e. additional tags). This double standard erodes hunter confidence in the government's decisions. To avoid this, the government should be clear about how these decisions will be made and apply it consistently to populations that are below or above the POR.

### Bruce Peninsula

The Bruce Peninsula bear population faces unique pressures, namely the long-term risks posed by low genetic variation due to no immigration of bears into this isolated population. The MNR has stated their goal is to increase the bear population from its current level to act as a buffer against the genetic pressures that it faces. However, the proposal does not include any actions to address the overarching concern of low genetic diversity.

Based on discussions with hunters and farmers in the area, there is widespread belief that the current population size on the Bruce is likely at the social carrying capacity. The area already experiences a significant number of human-bear conflicts and is forecast to grow by over 20,000 people in the next 20 years and will likely lead to increased conflicts with bears. We recommend lowering the population objective to reflect these realities. If we don't address the overarching problem of low emigration, management decisions that only target hunters, like season restrictions or a tag draw, are likely futile. However, we recognize that the translocation of bears onto the Bruce would be a very contentious issue despite its benefits to population genetics.

### Consideration for Moose Populations

A common concern in the hunting community is the impact of increasing bear populations on other wildlife species, particularly the impact of bear predation on moose calves in northern Ontario. As an example, the supplemental information states that black bear populations in many WMUs in northwestern Ontario are below the *draft* population objective range (which are subject to change). Many of these areas have also experienced declining moose populations that the MNR is actively trying to reverse (including recent research) initiatives. Many hunters question the logic of allowing bear populations to increase significantly in areas where moose populations are depressed. We strongly recommend the MNR consider lower PORs in WMUs that are being managed for increased moose populations, including but not limited WMUs 11, 12, and 13.

### Extending Protection for Cubs and Females with Cubs

Feedback from hunters indicates more opposition than support for extending harvest prohibitions to the fall season.

- It is largely unnecessary. As stewards of the resource, hunters inherently understand the importance of selective harvest and protecting the most reproductively valuable components of a population. The vast majority of black bear hunters already exercise this restraint by choosing not to harvest these animals, as do deer and moose hunters.
- It creates an enforcement issue (described in more detail below). It is good practice for governments to avoid creating laws that are unenforceable.

- The scientific literature does not clearly demonstrate a need for these prohibitions. The MNR has failed to produce evidence demonstrating that fall harvest of females with cubs occurs at biologically significant rates or impacts population sustainability. In the absence of convincing evidence, there is no reason to support additional regulation, particularly since hunter behaviour already protects those animals voluntarily.
- The MNR has stated that expanded protections would maximize cub survival and aid population growth. As stated earlier, most bear populations are within or above the draft population objectives, so population growth is not required. Furthermore, bear cubs face mortality from numerous sources such as predation, abandonment, death of the mother, etc., that will persist regardless of harvest restrictions. Anti-hunters will continue to blame every orphaned bear cub on hunting and will simply pivot to saying that hunters are now doing it illegally and call for greater enforcement.

### **Education Over Legislation**

Unnecessary and unenforceable laws pose real risks to the government and the hunting community. First, if the government imposes regulations that can't be enforced effectively and consistently, hunters become frustrated when they don't know how to comply with the regulation and worry they will inadvertently commit an offence and be charged. Second, poorly crafted legislation can result in Conservation Officers making difficult enforcement decisions about whether or not to take enforcement action and make it difficult for them to describe the letter of the law and its intent to hunters.

In this case, the most effective conservation tool is not punitive legislation that creates resentment and confusion, but instead education about the importance of those animals to population health to encourage and educate hunters of the importance of not harvesting sows with cubs in the fall. By reinforcing a hunter's sense of personal responsibility and their important stewardship role, education makes them partners in bear conservation, ensuring that reduced harvest of females is driven by conviction rather than just the fear of a fine.

### **Tag Draw**

While we recognize that increasing hunter numbers and harvest rates could ultimately impact bear populations, hunters are not convinced that a tag draw is necessary at this time except in cases of where populations are far below the POR. However, feedback from hunters indicates a preference for a tag draw over shorter seasons or complete season closure, because a tag draw would allow a level of hunting while a season closure would not.

Hunters have voiced numerous questions and concerns about the structure of a tag draw:

- If a tag draw is implemented in any Wildlife Management Unit, the tag allocation must be communicated well in advance.
- If a tag draw is implemented, the application process should be free of charge.
- If a tag draw is piloted on the Bruce Peninsula, the MNR should consider returning the seasons back to their original length (spring and fall).
- The MNR must clarify how licence validity and party hunting opportunities will function for hunters who hunt bears in multiple WMUs during the year when only some units operate under a draw system.

### **Possession of Bear Bile**

The illegal trade in bear parts undermines legal hunting and damages public perception of ethical hunters. The OFAH supports explicitly prohibiting the possession of bear bile outside of the gall bladder to strengthen enforcement of illegal trade.

## Ecosystem-Based Management

Hunters are growing tired of being the constant target of hunting restrictions while other influential factors are consistently ignored and not managed. Managing hunters through tag and season restrictions might limit harvest, but it does nothing to address the root causes of many population declines, such as habitat quantity and quality, food availability, and, in the case of Bruce Peninsula bears, genetic isolation. By focusing almost exclusively on regulating hunters rather than stewarding the resource, the government ignores the reality that a shrinking "supply" of wildlife cannot be fixed simply by rationing it more strictly. Conservation requires much more than hunter management - it requires an ecosystem lens that considers bears in land use and forest management decisions.

Thank you for considering our comments.

Yours in Conservation,



Mark Ryckman  
Director of Policy

cc: OFAH Membership Board of Directors  
OFAH Big Game Advisory Committee  
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