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OFAH MEMBERSHIP

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February 13, 2026

Environment and Climate Change Canada
Public Information Centre
351 St-Joseph boulevard
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Subject: Proposals to amend the Canadian Migratory Birds Regulations - 2026: consultation document, hunting seasons 2026-2027 and 2027-2028

On behalf of Ontario Federation of Anglers and Hunters Membership (OFAH), Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 675 member clubs, we have reviewed ECCC's Proposals to amend the Canadian Migratory Birds Regulations and offer the following comments for consideration.

Changes to regulations associated with the Canada Goose season starting the 4th Saturday in February

The OFAH is supportive of the proposal to establish a 7-day, late February Canada Goose hunting season in WMUs 69A, 70 to 73, 77 to 81, and 86 to 93. We are particularly supportive of the proposal to include Snow Geese and Ross's Geese to this season.

The OFAH has long advocated to expand Sunday Gun Hunting (SGH) opportunities to all parts of the province. Given Ontario's modern cultural landscape, in addition to the strains of irregular schedules and a high cost of living, there is no longer any reasonable justification for Municipal restrictions on Sunday gun hunting. For this reason, we support ECCC's decision to divest themselves from the issue of SGH by removing accommodations within the regulations that have inadvertently incentivized SGH restrictions.

Establishing a Sandhill Crane hunting season

The OFAH is very supportive of the proposal to establish a limited Sandhill crane hunting season in Ontario. After decades of advocacy, this season will be a meaningful opportunity for Ontarians to benefit from a true conservation success story.

As indicated in the proposal, recent estimates place the EP Sandhill crane population at 103,098 individuals, 72% above the upper management threshold of 60,000 individuals set by the harvest strategy. The EP population is experiencing exponential growth and, as a result, OFAH members in the Kawartha Lakes, Long Point, and many other parts of Ontario outside of the currently proposed geographic boundaries for the season have reported high concentrations of EP cranes.

While recognizing the need for a conservative approach during the creation of any new season, the OFAH recommends that, when feasible, ECCC and CWS consider expanding the hunt's geographic reach in the future. Given that the highest estimated harvest rate of the proposed season (1,343 cranes between Ontario and Quebec) is projected only to slow, not stop Sandhill crane population growth, geographic expansion appears unlikely to pose sustainability concerns.

Proposal to amend the baiting prohibition to allow baiting up to 14 days before the duck hunting season

We are supportive of the proposal to amend baiting prohibition to align with the original intent of the regulation while ensuring fair and sustainable harvest.

Proposal to phase out the physical Migratory Game Bird Hunting Permit and physical hunting summaries

The OFAH understands ECCC's aim to reduce printing, given Canada's Digital Ambition 2024-25 and Greening Government Strategy. However, efficiencies lack value when they come at the expense of important services, and many hunters will be let down by such an abrupt and significant change. The OFAH has heard from a substantial number of hunters who do not have access to or proficiency with smartphones or even computers. Others describe how valuable the physical stamps have been to them as collectors' items and the artful, physical manifestation of our conservation heritage. Many members even suggest that the stamps are a key reason for their purchase of migratory bird licence during years they do not hunt. This type of contribution from the hunting community should be encouraged rather than restricted.

To ensure fair treatment of all hunters and the continuation of an important conservation legacy, we strongly recommend ECCC retain the current model with an added fee for a physical permit and or licence summary. Hunters know how important licence revenues are for conservation and would be far happier to pay a few dollars more to this cause than lose the choice of a physical licence. We also suggest ECCC consider making migratory bird permits available at Service Canada locations to reduce burden on post office locations and make licensing more accessible for hunters.

Sustainable wildlife management is a responsibility shared by everyone. We thank ECCC and CWS for their continued engagement on important conservation and hunter-related issues and look forward to working together in the future.

Yours in Conservation,



Matthew Robbins
Fish & Wildlife Biologist

cc: OFAH Membership Board of Directors
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