



December 11, 2023

Paula Brand  
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Canadian Wildlife Service  
Environment and Climate Change Canada  
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Email: [LEPreglementations-SARAreductions@ec.gc.ca](mailto:LEPreglementations-SARAreductions@ec.gc.ca)

Dear Paula,

**Re: *Canada Gazette, Part I, Volume 157, Number 45: Order Amending Schedule 1 to the Species at Risk Act***

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Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *Canada Gazette, Part I, Volume 157, Number 45: Order Amending Schedule 1 to the Species at Risk Act*. BFO represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO strongly supports the principle and the act of protecting and recovering Ontario's species at risk. Approximately 68 per cent of wildlife habitat capacity within agricultural lands in Canada is supported by the land managed by beef producers, especially agricultural grasslands. Beef farmers are proud of the role they play in providing and maintaining habitat for wildlife on their farms, and the continued presence of species at risk on Ontario beef farms is a testament to the preservation of natural habitats on farms, like grasslands that take the form of pastureland and hay land.

Conflicts with wildlife, particularly wolves and coyotes, continue to present major issues for beef farmers and other livestock farmers across the province. In the 2021 and 2020 government fiscal years, approximately 90 per cent of Ontario Wildlife Damage Compensation Fund approved claims related to predation of cattle were caused by coyotes and wolves, resulting in over \$700,000 in compensation payments through the Program to cattle producers alone. The extent of the predation problem is, however, greater than current reports would indicate, given that compensation numbers do not reflect ineligible claims or unreported incidences, nor the fact that the current provincial compensation scheme fails to incorporate the replacement value of a lost animal or the carrying costs associated with maintaining an unproductive cow as a result of a lost calf. The bottom line is that predation events caused primarily by coyotes create significant costs for farmers and the broader Ontario economy.

In response to the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) recommendation made in 2015, it is our understanding the proposal to reclassify the Eastern Wolf from a status of species of special concern to threatened would automatically extend protections to the Eastern Wolf and provide general protections, as outlined in the *Species at Risk Act*, on federal lands. The proposal also states the reclassification of the Eastern Wolf would also provide the Minister with the ability to take action on non-federal land, if the Minister is of the opinion that

further protection is warranted. As is outlined further below, current prohibitions exist in Ontario for private property owners who reside in townships that are a part of the Eastern Wolf's range and that surround certain provincial parks. The ability to extend protections on private property is a major concern for BFO and our members, as a result of predation of livestock by coyotes and wolves.

We would like to remind ECCC of the current protections that exist for the Eastern Wolf in provincial legislation and regulations, and the impacts for private landowners. In 2016, protections were created for the Eastern Wolf when it was re-classified from special concern to threatened under Ontario's *Endangered Species Act* (ESA) and followed by subsequent changes to the *Fish and Wildlife Conservation Act* (FWCA). This change was in response to the Committee on the Status of Species at Risk in Ontario (COSSARO). The ESA provides an exemption for a person who is hunting or trapping in accordance with the FWCA and its relevant regulations; however, this exemption does not apply to provincial parks, Crown game preserve, and a number of municipal townships that surround certain provincial parks where the Eastern Wolf's range is. The prohibition for hunting and trapping Eastern Wolves also extends to coyotes within the townships outlined in the FWCA, which continues to be a big concern for beef farmers within these areas due to predation of their livestock. Farmers are operating in a complex legislative and regulatory landscape, and we do not support duplicative actions or additional regulatory burden on farmers.

In addition, COSSARO published its Risk Evaluation Report for Eastern Wolf in 2022 that states the Eastern Wolf population is currently stable. In its report, COSSARO maintained the Eastern Wolf status of threatened. The report notes Ontario represents the majority of the global range of Eastern Wolf and the current Ontario distribution of the Eastern Wolf is in central Ontario, with core concentrations in Algonquin Provincial Park and surrounding townships. The report also states that while the threat from hunting and trapping to the Eastern Wolf remains a concern, this threat is not increasing in central and southern Ontario, and more importantly, populations at this time seem stable. COSSARO's report also cites a recent study, which states the competitive imbalances between the Eastern Wolf, coyote, and gray wolf may result in losses to Eastern Wolf populations, particularly with the coyote dominating throughout much of the Eastern Wolf range. These competitive disadvantages are also a factor in the species' recovery potential.

Beef farmers are proud of the role they play in maintaining and managing their land, such as pastureland and hay land, for their cattle and for the variety of species that also utilize these spaces. At the same time, the impacts of predation on livestock are real and are a constant concern for livestock farmers. Thank you for the opportunity to provide feedback on behalf of Ontario's beef farmers.

Sincerely,

A handwritten signature in black ink, reading "Richard D. Horne". The signature is fluid and cursive, with the first name "Richard" and last name "Horne" clearly legible.

Richard Horne  
BFO Executive Director