



August 22, 2016

Wildlife Section & Species at Risk and Biodiversity Protection Section
PUBLIC INPUT COORDINATOR
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough, ON K9J 8M5

To Whom It May Concern,

Re: EBR #012-8104 & EBR #012-8105

The Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on EBR #012-8104, *amendments to wolf and coyote hunting and trapping seasons under the Fish and Wildlife Conservation Act in response to amendments to Ontario Regulation 230/08 (Species at Risk in Ontario List) under the Endangered Species Act, 2007 for Algonquin Wolf*, and EBR #012-8105, *amendment of Ontario Regulation 242/08 (General Regulation - Endangered Species Act, 2007) in response to changes to the Species at Risk in Ontario List*. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

The regulatory amendments being proposed under the *Fish and Wildlife Conservation Act (FWCA), 1997* in response to proposed amendments under the *Endangered Species Act (ESA), 2007* for the Algonquin Wolf will create damaging economic consequences for beef farmers who manage beef operations within the affected townships. As such, BFO is troubled by the regulatory amendments proposed by the Ministry of Natural Resources and Forestry (MNRF).

Conflicts with wildlife, particularly wolves and coyotes, continue to present major issues for beef farmers and other livestock farmers across the province. In the 2015 government fiscal year, 830 of the 900 reported cattle killed or injured in the province were caused by coyotes or wolves, resulting in over \$1 million in compensation payments through the Ontario Wildlife Damage Compensation Program to beef producers alone. The extent of the predation problem is, however, far 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.



The proposed regulatory amendments will only add to this problem by protecting a thriving coyote population for the sake of the Algonquin Wolf – a species that is supported by an existing wolf management system and that the Committee on the Status of Species at Risk in Ontario claims has a stable population.

Banning the hunting and trapping of coyotes and wolves and eliminating the right for farmers to protect their property from predators preying on their livestock in the noted townships will increase the amount of compensation the province will have to pay to producers in these areas. The proposed ban threatens the economic viability of beef operations in the affected townships, and hampers our industry's efforts to increase production in response to the Premier's 2013 Growth Challenge to double the agri-food sector's annual growth rate and create 120,000 jobs by 2020.

The Ontario beef industry is big business in this province. In 2015, beef farm gate sales revenue exceeded \$1.5 billion, in addition to the \$3.5 billion in processing and \$9 billion in retail sales revenue. The Ontario beef industry is also a major employer, responsible for 9,500 jobs in primary production, 9,000 in processing and more than 43,000 in retail. BFO simply cannot support regulatory proposals that fail to appropriately balance the public, social and economic interests of the province and the Ontario beef industry.

We are also concerned with the potential for regulatory creep, given the precedent these amendments may have in future decisions on the classification and protection of other livestock predators, and the potential for additional townships to be included in the Algonquin Wolf's habitat zone. The economic consequences of this potential regulatory creep would be significant for the province's livestock sectors.

The most significant concern to BFO and our members is the proposed elimination of the right to protect one's property, guaranteed under Section 31 (1) of the *Fish and Wildlife Conservation Act, 1997*. The act states that if a person believes on reasonable grounds that wildlife is damaging or is about to damage the person's property, the person may, on the person's land, harass the wildlife for the purpose of deterring it from damaging the person's property, or capture or kill the wildlife. Eliminating this basic right as a property owner is unacceptable, and in BFO's opinion, it is in contradiction to the Government of Ontario's *Regulator's Code of Practice*, which states that regulators should encourage economic progress when developing new regulations.

The proposal to completely remove the ability of farmers to address imminent conflicts with wildlife in protection of their property needs to be revisited by regulators.

- **BFO recommends that any amendments to the FWCA or the ESA must allow farmers in all wildlife management units in Ontario the right to protect their property from coyotes, wolves and other predators without restriction.**

Removing farmers' right to protect their property, in addition to banning hunting and trapping, would represent a clear failure by MNRF to balance public, social and economic interests and is something BFO does not support.

There have been hunting and trapping prohibitions in Algonquin Provincial Park and the surrounding townships for approximately 14 years. Prior to the implementation of these harvest bans, Algonquin Wolf populations appeared to be stable or growing. Park authorities at the time confirmed the Algonquin Wolf population had remained stable for the previous 30 years.



- **BFO recommends that prior to any consideration of an expansion of the hunting and trapping prohibition, it must be shown that existing hunting and trapping restrictions have generated a significant benefit to the genetic integrity and/or abundance of Algonquin Wolves. If a 14-year hunting and trapping ban has not generated a demonstrable benefit based on irrefutable science, then further restrictions are not defensible.**

- **BFO recommends that a comprehensive cost-benefit analysis of any proposed management solution be completed before any further contemplation of implementing the proposed regulatory amendments.**

In closing, we ask that the Ministry incorporate our recommendations and work with the agricultural community on a collaborative approach to conservation that balances environmental interests with the economic interests of the livestock industry and broader Ontario economy.

It must be stated that beef farmers take their responsibility as environmental stewards very seriously, but they are also business people who operate in a volatile and extremely competitive market. Additional cost burdens placed on industry must be based on sound, science-based evidence and effectively balance public, social and economic interests.

BFO would like to thank the Ministry of Natural Resources and Forestry for providing the opportunity to comment on proposed amendments to the *Fish and Wildlife Conservation Act, 1997* and the *Endangered Species Act, 2007*. We would be pleased to meet with you in person at your earliest convenience to discuss our comments and the proposed amendments in further detail.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors
Chloe Stuart, MNRF
Adam Meyer, OMAFRA
Rob Scott, OSMA
Don McCabe, OFA

