



February 20, 2018

Amy Mouganel
Manager
Species At Risk Recovery Section
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON K9J 8M5

Ms. Mouganel,

Re: EBR #013-1813

The Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on EBR #013-1813, *Request for additional information to be considered in the development of the recovery strategy for Algonquin Wolf under the Endangered Species Act, 2007*. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, animal health and welfare, and domestic and export market development.

Conflicts with wildlife, particularly wolves and coyotes, continue to present serious risks 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 government-funded compensation payments through the Ontario Wildlife Damage Compensation Program (OWDCP).

The extent of the predation problem, however, is far greater than OWDCP reports would indicate, given that compensation numbers do not reflect ineligible claims or unreported incidences, nor the fact that the current OWDCP does not compensate for true replacement value. Furthermore, the OWDCP does not require any distinction between species of coyotes and wolves, and the misidentification of wolves as coyotes, and vice-versa, is quite common given the difficulty distinguishing wolves, coyotes and hybrid species from one another. Consequently, we believe it is inappropriate to attempt to minimize the impact that Algonquin Wolf (AW) recovery initiatives or hunting/trapping restrictions may have on livestock operations by using current OWDCP statistics as evidence of the breadth of the problem.

Specific to the recovery strategy, BFO would like to point out that the “*Compensation*” section on page 31 cites predator compensation statutes that were repealed many years ago in favour of current statutes, while ignoring the current OWDCP that was launched in 2013. Despite this oversight, predation events caused primarily by coyotes and wolves create significant costs to farmers and the broader Ontario economy – costs that cannot be sufficiently recovered through the existing OWDCP. To imply that the OWDCP will provide a sufficient safeguard for farmers facing a potential increase in conflicts with predators due to added protections for wolves, coyotes and hybrid species is both inaccurate and dismissive of the real predation risks and mitigation needs of livestock farmers.

130 Malcolm Road, Guelph, ON N1K 1B1
P/ 519.824.0334 TF/ 1.866.370.2333 F/ 519.824.9101

www.ontariobeef.com



BFO's primary concern with the proposed recovery strategy is that it fails to adequately outline how conflicts with livestock on farms located within or directly adjacent to the proposed recovery zone will be mitigated. Notwithstanding the shortcomings of Ontario's current predation compensation program, there is no dedicated funding program that helps farmers offset the costs of implementing mitigation strategies for reducing conflicts with wildlife. To reduce the province's liability under the OWDCP and to help reduce livestock conflicts with the AW, as well as other wolf, coyote and hybrid species, we recommend that a predation mitigation fund be established. Funding should be directed towards predator fencing, guard animals, and noise and light deterrents, as well as trapping and removal services to relocate problem predators.

BFO was pleased to see *Objective 6.5* incorporated in the draft recovery strategy, which recommends research and funding support for actions that reduce conflicts between livestock producers and the AW within the recovery zone. The additional commitment to work with government agencies to reduce the cost of deterrent tools is welcomed by industry and reinforces BFO's recommendation to establish a predation mitigation fund as described above.

While BFO supports the exemption under the *Endangered Species Act (ESA)* that allows protected species to be killed, harmed or harassed if there is an imminent risk to the health and safety of livestock, people or companion animals, we remain concerned that the term "imminent threat" does not provide sufficient legal scope to allow livestock farmers to effectively defend their livestock against threats from coyotes and wolves.

Removing farmers' rights to adequately protect their property, in addition to banning hunting and trapping, represents a clear failure by the Ministry of Natural Resources and Forestry (MNRF) to balance public, social and economic interests. This failure to balance conservation needs with the needs of farmers invites non-compliance from livestock owners, which may counteract recovery goals. At a minimum, livestock farmers should be permitted to hunt and trap predators on their own property as well as the property directly adjacent to their own (with the permission of the adjacent land owners), regardless of whether the predator is protected under the ESA or not. BFO encourages MNRF to develop a livestock exemption to the hunting and trapping ban on AW and other wolves and coyotes within the proposed recovery zone. This will ensure the relatively small number of farms that will be directly affected are not placed at a competitive disadvantage to farms in other parts of the province.

Ultimately, it is our opinion that an expansion of AW and coyote/wolf protection zones into highly modified agricultural landscapes will not benefit the recovery of the AW, but will exacerbate the viability of livestock farmers. 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.

Summary of Recommendations

1. Develop a predation mitigation fund to help livestock producers who are within and directly adjacent to the proposed recovery zone reduce conflicts with predators.
2. Conduct a comprehensive cost-benefit analysis of the impact the proposed recovery strategy initiatives and current ESA restrictions will have on livestock operations within the recovery zone, as well as those directly adjacent to the recovery zone.



3. Pursue the necessary legislative and/or regulatory amendments to allow farmers to hunt and trap predators on their own property, as well as directly adjacent property with permission of the land owners, in an unencumbered manner and regardless of whether the predator species is protected under the ESA.

In closing, we ask that the Ministry adopt our recommendations and work with the agricultural community on a collaborative approach to conservation that balances environmental priorities with the priorities of livestock farmers and the broader economic interests of the province.

BFO would like to thank the Ontario Ministry of Natural Resources and Forestry for providing the opportunity to comment.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors
Ontario Sheep Farmers
Ontario Federation of Agriculture

