



OCA Position on Managing Agriculture-Wildlife Conflicts (*Predation*)

i. Compensation

The current compensation maximums are both outdated and unreflective of actual livestock values. Compensation maximums must be periodically updated at minimum, bi-annually, to ensure values are current. Ultimately, the Ontario government must commit sufficient dollars to livestock compensation programs to meet demand. OCA supports a 60/40 cost-shared agreement with the federal government as is the case in other provinces. Moreover, OCA appreciates and supports no producer premiums.

The proposal that would require producers to attend regular control workshops if they make more than two claims in five years is simply unrealistic. This is unreflective of current predation prevalence as it fails to acknowledge areas where predation is high. It also fails to recognize the fact that experienced farmers continue to suffer livestock losses through no lack of effort on their part.

In addition, the point stating that “payments would be linked to the lesser of 80 per cent of the market value of the animal or 80 per cent of the prescribed maximum” is simply punishing producers for having livestock that is susceptible to predation. There is nothing to be gained for producers who suffer livestock losses due to predation. Therefore this “co-insurance approach” is insulting and unfair. Recognizing the vulnerability of calves to predators, OCA supports the current legislation which values newborn calves at 70% of the value of a 500lb weaned calf with values increasing at 5% per month up to seven months, assuming compensation levels are updated to reflect current values. This provides some return to producers who lose substantial future value in the loss of a calf.

ii. Valuation Process

It is unacceptable that when evidence of predation is deemed “probable” by a valuer, that compensation is cut by 50% for lack of certainty. Valuers’ discretionary authority reduces both the consistency and integrity of the compensation process. Given that valuer training is extremely inconsistent, if not absent entirely in Ontario, a mandatory valuer training program should be developed.

Furthermore, it is difficult to decipher what is deemed ‘reasonable’ with regard to a producer’s effort in preventing wildlife damage from occurring. The word ‘reasonable’ should be removed as it denotes a subjective determination of one’s effort in preventing wildlife-conflicts.

Additionally, under the proposed regulations there is no mention of an appeals process in a case where a producer disagrees with a valuer's assessment. Given the subjectivity surrounding valuation and inconsistency of training, an appeals process must be included in these changes.

iii. Proposed Program/Tools

An expanded list of eligible livestock is commendable but must also include livestock guard dogs that are becoming increasingly at risk to predators. In addition, OCA supports the expanded list of predators but it must also include birds of prey such as ravens and black vultures, and cougars which have been identified as an active species in Ontario by the MNR.

OCA supports best management practices workshops so long as they are truly effective for all major farm types and sizes; there shouldn't be a one size fits all program. It is unrealistic to think that all prevention programs can be applicable to all farms in Ontario.

OCA supports strategic investment funding as it could be extremely beneficial for producers looking to implement best management practices related to agriculture-wildlife conflicts. However, we are concerned that funds directed toward this initiative will reduce the Ministry's capacity to fund the compensation program.

iv. Discussion Question Responses

1. Are there any specific information materials you would like to see developed?

- Farmer targeted factsheets on the behavior of specific wildlife predators (cougars, coyotes, wolves, bears), and effective measures for reducing conflicts with cattle.
- Information booklet for rural non-farmers on the benefits of trapping and hunting nuisance wildlife.

2. What are other tools OMAFRA, MNR and industry can work together on?

- Directing funds toward population control rather than reactive predation payments would be a beneficial long-term strategy. The increasing incidents and payouts indicate the **need** for controls on predator populations
- Allowing predator control tools, specifically non-lethal snares for Southern Ontario.
- Snares are legal all year round in Northern Ontario, and on a seasonal basis in Central Ontario. Prohibiting snares in Southern Ontario in a region with the highest livestock population and arguably the highest coyote density places area farmers at a distinct disadvantage from the rest of the province. The use of non-lethal snares *should* be reinstated in Southern Ontario as an effective measure in controlling the coyote population
- Snares could only be used by licensed trappers or producers who satisfy the following conditions:
 - i. Be approved and take a comprehensive course on snaring
 - ii. The snares would have to be checked at least once every 24 hours
 - iii. The approved farmer could only snare on his/her own property or property immediately adjacent to it
- Additionally, snaring would only be allowed from April 15th-October 15th to minimize interference with hunters.
- Provide an abbreviated training course for farmers on the use of traps/or non-lethal snares for effective predation control.
- Provide for the return of predator control officers (situated throughout the province) who can supply site-specific advice to producers on ways and means to mitigate predation losses, and also provide contact information for skilled hunters and/or trappers to remove problem predators.
- Exempt farmers who use bona fide livestock guard animals from municipal “dog” by-laws, number limits, noise from barking, license fees, etc.

3. What are the key priorities in designing an appropriate compensation framework for livestock losses?

- Compensation levels that reflect current livestock values.
- Ensure valuers remain current with respect to regulations and values.
- Ensure proposed best management practices truly are effective for the farm type and size

4. Do you see a role for industry in developing or delivering the best management practices workshop?

- OCA sees a role for industry in collaboration with government and other commodity organizations in the development of best management practices workshops and any subsequent workshops.
- It should be recognized that only so much can be done to protect ones livestock from predation. The sheer size of some beef operations in Ontario make it nearly impossible to prevent predators from entering ones property.

5. **Are there any other improvements that are needed to improve program delivery for wildlife compensation programs?**

- Improved communication between the province, municipalities and valuers in order to ensure all parties are working from the same guidelines (there are too many instances of local inconsistencies).