

OCA Position Paper – Strategy for Wolves

January 4, 2005

Ministry of Natural Resources
Fish and Wildlife Branch
Wildlife Section
300 Water Street
5th Floor, North Tower
Peterborough , Ontario
K9J 8M5

Re: EBR Registry Numbers RB04E6020 and RB04E6012

On behalf of both the Ontario Cattlemen's Association (OCA) and the Ontario Sheep Marketing Agency (OSMA), please find below our comments in response to the Proposed Provincial Strategy for Wolves in Ontario and regulatory amendments under the Fish and Wildlife Conservation Act (FWCA) to enhance wolf conservation in specific areas.

For introductory purposes, OCA and OSMA represent over 20,000 beef producers and 4,200 sheep producers in Ontario respectively. The vast majority of our members maintain their livestock in an outdoor or extensive production setting, many within remote rural areas of northern and central Ontario where land is better suited for grazing livestock than cash crops. Our members are farmers who work within the natural environment and recognize the importance of wildlife within a dynamic ecosystem. Wildlife population changes that impact on the health of native ecosystems are considered of real concern and require practical, science-based solutions.

In our interpretation, both the Proposed Provincial Strategy for Wolves and related regulatory amendments were developed by the Ministry of Natural Resources (MNR) in response to a potential future concern that the integrity of the Eastern and Gray wolf populations may be negatively impacted over time by a number of factors. It is our understanding from provincial biologists and relevant wildlife conservation bodies that there is no demonstrated need for additional protection of Ontario wolves, and in fact populations have been healthy and stable for the last thirty years. The "Backgrounder on Wolf Conservation in Ontario " that accompanies the new regulations states that "wolves probably still occupy 85% of their historic (precolonization) distribution in Ontario ." It also states that " Ontario continues to have more wolves than any other state, province or territory in North America ", and "it is likely that wolf numbers in most areas of the province have been either stable or increasing since 1993." However we do respect the intent and premise presented within the enhanced wolf strategy for the purpose of management planning. That being said, we ask MNR to consider future actions that will impact on our members within the context of preserving livestock agriculture in rural Ontario as economically viable.

As you would anticipate, OCA and OSMA share in the primary concern that regulatory amendments, with the objective to enhance wolf conservation, will negatively impact on predation issues within our sectors. Both wolves and coyotes prey on livestock in addition to preying on deer, moose and other small wild prey. Farmers consider their right to protect livestock more important than receiving compensation after a predation loss. Compensation cannot cover the worry, frustration and sleepless nights that a farmer goes through when predation becomes severe. The time and logistics required to collect compensation on predation losses often negates a claim. In addition, particularly with young lambs on pasture, no carcass is found, so no claim can be made. The Ontario Soil and Crop Improvement Association in a 2002 report stated that "between 20% and 30% of provincial livestock losses were recovered through current municipal and provincial compensation plans." Many farmers spend large sums of money to protect their

livestock through methods such as predator resistant fencing and guard animals but these preventative measures can be ineffective in areas of high predation pressure. We noted that Strategy 10 of the proposed Strategy for Wolves in Ontario makes reference to exploring effective and low-cost options to reduce livestock losses due to predation by wolves. OCA and OSMA have worked closely with the Ontario Ministry of Agriculture and Food, often in partnership with the Ontario Soil and Crop Improvement Association, in developing a number of such management tools and we would encourage MNR to pursue this further. We were pleased to note that the guiding principles of the Proposed Strategy for Wolves in Ontario included the protection of human life and property.

However, we are concerned with the challenge presented to farmers when they must reconcile Section 31 of the FWCA with proposed regulatory amendments outlined in EBR- RB04E6012. In previous correspondence with the MNR our organizations have expressed concern with the right to protect property not only during active predation but also when a situation has the potential for damage. Despite statements from MNR that Section 31 of the FWCA provides coverage for farmers that must protect their livestock, we feel that wording such as "wildlife that is damaging or is about to damage a person's property", is unclear and open to interpretation. Does the predator actually have to be in the field about to attack the livestock before it may be destroyed? Section 31 also contains the phrase "on the person's land" This would imply that the owner of the livestock cannot trap or hunt on surrounding land, even with the landowner's permission. Coyotes will frequently travel several miles from a den to take lambs. Indeed, if trapping is limited to the farmer's own land most likely only the animals caught will be the farmer's own guard dogs. These restrictions would impose such severe limitations on the rights granted under Section 31 as to make them virtually worthless, despite assurances from the provincial government that the new regulations will not interfere with a farmer's right to protect their livestock. We would request that under Section 31, wording ensure that farmers or their agents have an automatic right to protect livestock without the requirement for a seal or bag limit, or restrictions on where they may operate, provided they have the landowner's permission. Managing predation can be time-sensitive and the task of processing a permit can cause an unnecessary and costly delay in the on-farm response time.

In reference to proposed amendments within the Wildlife Management Units (WMU), limiting hunters to two wolves, or even more problematically two coyotes, per year completely ignores the reality of a litter of pups with equal capacity to cause harm. During the winter season, in many agricultural areas of the province, groups of hunters are responsible for reducing the wolf/coyote population to manageable numbers. A seal limit of two per hunter is likely to result in an out of control predation problem in the following summer, and greatly increased compensation payments by the province. Furthermore, a closed season from April 1 to September 14 disregards the issue of managing predation before a livestock mortality is realized. In agricultural areas, the proposed regulations will seriously restrict farmers in their ability to protect their livestock and livelihoods. Therefore within the proposed list of WMUs, we ask for a full exemption for Manitoulin Island, south Temiskaming, parts of Cochrane and Kapuskasing, areas near the Sault/Iron Bridge, two areas in Nipissing (Powassan and Verner), part of Sudbury District, and the northwest: Thunder Bay, Rainy River and Emo from all proposed regulatory amendments where there will be little impact to the goals of the wolf strategy.

In closing, we recognize the Province of Ontario 's commitment to implementing a provincial strategy for wolves and the initial step in proposing preliminary conservation actions in selected WMUs. However, we are deeply concerned that a provincial wolf strategy incorporates coyotes as a default addition within the first set of regulatory amendments without adequate justification. Coyotes are a separate species posing a serious threat to livestock, in most agricultural areas serving as the major predator to both sheep and cow herds. We feel strongly that within the proposed Wolf Strategy, there is not adequate scientific evidence or rationale for the inclusion of coyotes and we therefore request that coyotes be struck from reference within EBR – RB04E6012.

Best Regards,

Ron Wooddisse, Ontario Cattlemen's Association
President John Hemsted, Chair, Ontario Sheep Marketing Agency

cc: The Honourable Steve Peters, Minister of Agriculture and Food
Ontario Federation of Agriculture
Ontario Soil and Crop Improvement Association
Ontario Federation of Anglers and Hunters