



**Ontario
Cattlemen's
Association**

Committed to Cattlemen

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Strategic Policy Analysis and Coordination Unit (Toronto)
77 Grenville Street , Floor 11
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8th of April, 2011

Re: Discussion Paper 2: Managing Agriculture –Wildlife Conflicts

Dear Mr. Beitz and Mr. Tremblay,

The Ontario Cattlemen's Association appreciates the opportunity to comment on the Ministry of Agriculture, Food and Rural Affairs' recently released *Wildlife Discussion Paper*. Conflicts with wildlife have been, and continue to be a major issue for OCA and our 19,000 members. While we appreciate the fact that agriculture-wildlife conflict legislation is being updated, there are several points of concern to OCA and our members.

Improve Awareness and Information Resources for Producers

OCA supports the commitment to a one-window source for information both online and in print, and appreciates the government's proposal to explore opportunities for outreach via Ontario's established stewardship programs.

OCA supports the enhancement and development of best management practices so long as they are truly effective for ALL major farm types and sizes; there should not be a one size fits all program. In addition, we oppose the suggestion to add a predation component to an already robust EFP workshop. Improving awareness and providing resources for producers on managing agriculture-wildlife conflicts should be conducted in separate workshops.

Programs and Tools

a) Tools for Wildlife Management

Point one vows to continue to manage wildlife populations but fails to recognize that coyotes, the species primarily responsible for livestock losses, are NOT managed by MNR in any way.

OCA supports the proposal to link wildlife population management objectives to agricultural crop damage, for species such as elk, deer, bear or wild turkey.

b) Strategic Investments

While OCA supports the enhancement and development of BMP's, it is unclear as to where the money would come from to support these investments. We fully expect these funds will not come from the compensation program budget.

c) Production Insurance

OCA fully supports improvements to production insurance to include wildlife damage to crops. To be truly effective, wildlife damage to crops would require a long-term funding commitment, consisting of significant dollars.

Compensation

a) Eligibility

We applaud the expanded list of eligible livestock and eligible predators. However, the absence of livestock guard dogs is unacceptable given the fact that donkeys and llamas are also used as guard animals and are included in the expanded list of livestock eligible for compensation claims. We strongly support including bona fide guard dogs as eligible livestock.

b) Proposed Compensation

The current compensation maximums are both outdated and unreflective of actual livestock values. OCA demands that compensation for a confirmed predator kill be set at 100% of fair market value. In addition, there is a noticeable absence of how newborn calves would be valued under the proposed compensation changes. OCA strongly suggests that OMAFRA retain its current formula 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. This provides some return to producers who lose substantial future value in the loss of a calf.

Despite the number of concerning gaps in the proposed compensation section of this document, it is OCA's understanding that compensation formulas will be developed by the Agriculture-Wildlife Conflict Working Group. We support livestock industry input into the development of a realistic and up to date compensation schedule.

c) Funding

OCA supports a 60/40 cost-shared agreement with the federal government. Moreover, OCA appreciates and supports the proposal to impose no producer premiums.

d) Claims Process

OCA supports the proposal to eliminate the affidavit requirement to be replaced with a producer's signature on the valuation report. In addition, we are encouraged to see that an appeals process for the compensation program will be maintained.

We are concerned however, with the point that states *"any insurance payment received by the producer for death or injury to livestock, poultry or honey bees will be deducted from the compensation payment."* OCA strongly opposes this. Farm insurance policies usually require farmers to obtain compensation from OMAFRA first. If the loss exceeds OMAFRA's compensation, then the farmer's insurance will address it. We support the retention of the current OMAFRA first, private insurance second, as the model for compensation claims moving forward.

e) Municipal Delivery

We applaud the proposal to improve and update valuer training to ensure consistent delivery, as well as the commitment to reimburse a portion of the municipal administration costs for claims processing. A component of the valuer training should emphasize the fact that experienced farmers continue to suffer livestock losses through no lack of effort on their part. To reflect current predation prevalence in areas where predation levels are extremely high, producers should be reimbursed for costs of removing problem coyotes (to bring in license hunters or trappers). This could be time limited, and property specific, in response to a kill, and on the recommendation of the valuer.

Greater Collaboration between OMAFRA, MNR, and Stakeholders

We support the commitment to a collaborative effort among the various stakeholders and would like to thank Minister Mitchell and OMAFRA staff for including OCA in discussions on ways to effectively manage agriculture-wildlife conflicts. Part of this collaboration however, should include discussions about creating a compensation program with the flexibility to quickly adjust in response to changing market conditions.

Additional Gaps and Points of Concern

- The paper commits to improving programs and tools but gives few details.
- It is unclear if compensation would be 100% of fair market value or less.

- **OCA demands that compensation for a confirmed predator kill be set at 100% of fair market value.**
- It is unclear how newborn calves will be assessed.
 - **OCA suggests retaining the current formula which values newborn calves at 70% of the value of a 500lb weaned calf with values increasing at 5% per month up to 7 months.**
- It is unclear whether compensation will differ depending on the predator responsible for the kill.
 - **OCA demands a standard compensation formula which values all predators equally.**
- The proposal does not address the repeated calls to permit the use of non-lethal cable restraints in Southern Ontario. Lethal snares are legal all year round in Northern Ontario, and on a seasonal basis in Central Ontario. Prohibiting the use of non-lethal cable restraints 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.
 - **OCA strongly suggests that the government of Ontario legalize the use of relaxing non-lethal cable restraints in Southern Ontario as an effective measure in controlling coyote induced livestock predation.**
 - **OCA further suggests that the use of relaxing non-lethal cable restraints be limited to licensed trappers and/or producers who satisfy the following conditions:**
 - i. **Are approved and take a comprehensive course on the use of non-lethal cable restraints;**
 - ii. **Check their non-lethal cable restraints at least once every 24 hours;**
 - iii. **Comply with the fact that approved farmers can only utilize the device on his/her property or the property immediately adjacent to their own;**
 - iv. **Comply with seasonal restrictions that would limit use outside of the April-October window in order to minimize interference with hunters.**

The Ontario Cattlemen's Association truly appreciates the opportunity to provide input on the *Wildlife Discussion Paper*. We look forward to having our position reflected in the final version. Please contact me if you have any questions or concerns with any of the above comments.

Yours truly,



Richard Horne
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Ontario Cattlemen's Association