

OFAH FILE: 405/794
February 18, 2020

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To Whom It May Concern:

Subject: ERO #019-1112 Proposed changes to black bear hunting regulations

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the proposed changes to the black bear hunting regulations and offer the following comments for consideration.

The OFAH supports the full return of spring bear hunting in Ontario

We applaud the Government of Ontario for proposing to regularize the spring bear hunt. We acknowledge that the spring bear hunt remains a contentious issue, but commend the government for following the scientific evidence showing that the spring hunt is sustainable, rather than letting emotional rhetoric and targeted disinformation campaigns dictate wildlife management in the province. This reaffirms one of the core principles of the North American Model of wildlife management - that science is the proper tool to guide wildlife policy. Allowing emotion to dictate wildlife management decisions in the province is a slippery slope. Those who advocate for the cancellation of the spring hunt based on personal opposition to hunting fail to realize that, by deviating from the principle of science guiding policy, they are opening a door that would allow other emotional arguments to influence wildlife management in the province. There are those who view black bears as vermin that should be exterminated, which is an equally emotional response. Neither of these extreme views should dictate wildlife policy if our goal is to have sustainable bear populations in the province.

In 1999, Dr. Martyn Obbard, Ontario's leading black bear scientist, described the orphaning of cubs by hunters as an "extremely rare event," due to a combination of black bear behaviour and hunting regulations. Female bears do not produce their first litter until they are at least five years old and, due to the fact that offspring stay with the female until they are 16-18 months of age, give birth to cubs no more often than every other year. This means that only a small proportion of female bears has cubs in any given year. In the spring, those female bears with cubs are relatively sedentary, meaning they move less than other bears and tend to avoid areas where they are likely to encounter other bears. This reduces their susceptibility to harvest (Kolenosky and Strathearn, 1987).

Additionally, cubs and females with cubs are protected by Ontario's hunting regulations. It is illegal to kill a cub or a female with cubs in the spring season and doing so carries severe penalties of up to \$25,000 in fines and/or up to a year in jail. Ontario's hunters are some of the most highly trained in the world and a key component of this training is knowing your target and ensuring you are harvesting a legal animal. This philosophy has been evident in the results of Ontario's pilot spring bear hunt. The Ministry of Natural Resources and Forestry's (MNRF) Enforcement Branch, which dedicated significant resources to enforcement activities during the spring hunt, has confirmed that no charges have been laid for the shooting of a cub or a female with cubs since the pilot was initiated. A comprehensive study of Manitoba's spring black bear season (Hristienko et al., 2004), which is similar to Ontario's, found that the number of cubs orphaned by hunters was less than 2% of the estimated number that die each year from natural causes. In reality, many factors other than hunting can lead to the orphaning of cubs including: abandonment by the sow due to limited milk supply, human disturbance at the den site, the death of the mother in vehicular- and nuisance-related incidents, and cannibalism of the sow by other bears. Despite this, animal rights activists attribute all instances of orphaned cubs to hunters and continue to promote a false narrative around the spring bear hunt in an attempt to deceive the public.

The pilot project has demonstrated that the province's black bear population can support both spring and fall seasons sustainably. The MNRF has determined that approximately 10% of the province's black bear population can be harvested annually and has estimated that the provincial black bear population is between 85,000 and 105,000 bears. Even if we assume that the population is at the lower end of this range, the combined spring and fall harvest has been below the 10% threshold for all years of the pilot project for which we currently have harvest data. Ontario is well prepared to sustainably manage black bear harvest going forward and, through investment in the provincial barbwire hair strap study and new mandatory reporting requirement, has the tools to identify and address any conservation concerns if or when they arise.

For these reasons and the benefits that it provides, the OFAH fully supports the full return of the spring bear hunt. This has been a major advocacy priority of the OFAH since the spring hunt's abrupt cancellation in 1999. We fought the cancellation in court for three years and have kept it at the forefront of our advocacy efforts ever since, lobbying successive provincial governments. We fought for the limited pilot spring season that was introduced in 2014 and then advocated to have it expanded in 2016. With the pilot set to sunset on June 15, 2020, we fought to secure the certainty for our members and the hunting community at large.

The return of the spring bear hunt provides hunters, northern and rural businesses, the general public and the bears themselves with benefits that have been lost for the past twenty-one years. Hunters benefit from a unique season that provides healthy meat, valuable hides and time spent with friends and family. Ontario's economy benefits from the estimated \$50.6 million that bear hunting contributes annually, \$13.8 million of which is from the spring hunt and which will likely increase as tourist outfitters invest in a season they know will exist in the future. The general public, who will interact with bears in a wide variety of circumstances from nature viewing to human-bear conflict, benefit from a comprehensive suite of black bear management tools where education is complemented with regulated hunting to ensure ecologically, culturally and socially sustainable bear populations. Finally, the bears themselves benefit from increased funding for their management and increased social tolerance. All revenue from hunting licences directly fund wildlife management in the province and bear licences on their own contribute over \$2 million annually. The relationship between the public and bears has fluctuated significantly over the past hundred years. Prior to 1961, black bears were considered vermin in Ontario and shot under a bounty system. It was the OFAH's lobbying effort that led to them being recognized, managed and valued as a big game species. Since the cancellation of the spring bear hunt, the pendulum has started to swing back in the other direction, as members of the public perceive conflict in the absence of benefits. This is a worrisome trend and the OFAH sees the return of the full spring bear hunt as a major step in addressing it.

Black bear hunter reporting requirements

The OFAH supports the changes to the reporting framework, where black bear hunters will be only required to submit a single annual report, regardless of when they bought their licence, as the current system has caused some confusion among hunters. We recommend that the MNRF clearly communicate to hunters what information will be required on the report in order to ensure that information is not lost or forgotten, especially for hunters who hunt both the spring and fall seasons.

Black bear hunting on Bruce Peninsula

To address a declining black bear population on the Bruce Peninsula, the MNRF has proposed to reduce the spring season to one-week (May 1st to May 7th) and close the fall season in wildlife management units (WMU) 82A, 83 and 84. The OFAH's first priority is the conservation of the resource and, therefore, we do not support any actions that would put the future sustainability of Bruce Peninsula's black bear population in jeopardy. In order to inform our position on the proposed changes, we have requested from the MNRF additional information that unfortunately was not received in time to inform this response. We strongly feel that answers to the following questions are critical in ensuring sustainable management of the Bruce's bear population:

1. *What aspects of the current black bear harvest on Bruce Peninsula are unsustainable? Is the overall harvest too high, is the sex ratio of the harvest skewed too heavily towards adult females, or is it a combination of factors?*
2. *What supporting evidence (i.e., harvest records, telemetry data, etc.) do you have that indicates that the one-week spring season will effectively address these concerns? While the OFAH does not want to see sustainable hunting opportunities unnecessarily restricted or lost, we also do not want to see a season that allows overharvest by not being as restrictive as needed.*
3. *If these objectives are achieved, what specific effect do you expect it to have on the Bruce's black bear population and why? A management plan should have an expected outcome against which its success is measured.*
4. *Is this expected effect sufficient to ensure the long-term sustainability of the population given its isolated nature or are other measures needed? Research conducted by Pelletier et al. (2017) highlights the long-term genetic diversity challenges faced by this population. It is the OFAH's hope that the MNRF would take any additional measures needed to ensure this population's sustainability and not limit their actions to regulating hunter harvest.*

Without answers to these questions, the OFAH cannot develop an informed position on the proposed changes to black bears seasons on Bruce Peninsula other than to say that we support wildlife management decisions that result in sustainable hunting opportunities while ensuring the long-term conservation of the local black bear population.

Special non-resident hunting opportunities and resident guiding requirements

The OFAH does not have any specific comments related to the elimination of special black bear hunting opportunities for non-resident landowners or the requirement for individuals or businesses to have a "Licence to Provide Black Bear Hunting Services" when providing guiding services to residents within a Bear Management Area. We do question the need to restrict the special hunting opportunities for non-resident immediate relatives. The current regulations allow non-resident immediate family members to hunt black bear without the services of a tourist outfitter. Recognizing that the number of hunters who take advantage of this opportunity is very low (approximately 10 or less per year), the OFAH would prefer to see this opportunity remain in place. This would allow family members to continue to hunt together, maintaining traditions and the bonds fostered by participating in an important heritage activity. We live in a time where many people move within Canada and beyond for employment opportunities and we should be doing what we can to strengthen, rather than weaken, these bonds. Hunting through an outfitter is not the same as hunting with family and may not provide the type of hunting opportunities they are seeking.

Future black bear management needs

The OFAH will continue to work with the MNRF to ensure that future management needs for black bear are addressed. We continue to advocate for expanded fall black bear hunting opportunities in WMUs that currently do not have them. Expanding black bear hunting brings the same benefits associated with the return of the spring hunt as described above, especially the increased tolerance. We frequently hear from members of the public in areas without black bear seasons about their frustration with unmanaged bear populations. Given that regulated hunting is recognized as an important tool in the bear management tool box and that hunting increases the social tolerance around black bears, we strongly recommend that the expansion of hunting opportunities be seriously explored. Two wildlife management units where we hear particular concerns are 78A and 78B, immediately to the south of Lake Simcoe.

As always, the OFAH stands ready as a partner in sustainable bear management in the Province of Ontario. Thank you for the opportunity to provide input into this important proposal.

Yours in Conservation,

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