

Open Letter

Regarding Fall Harvest of Double-crested Cormorants

To: Minister John Yakabuski, Minister of Natural Resources and Forestry
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Cc: Premiere Doug Ford (doug.fordco@pc.ola.org), Honourable Jonathan Wilkinson, Minister of Environment and Climate Change Canada (Jonathan.Wilkinson@parl.gc.ca), Ontario's Regional Director General's Office (ec.grandslacs-greatlakes.ec@canada.ca)

September 1, 2020

Dear Minister Yakabuski;

On July 31, 2020, the Government of Ontario announced a 106-day fall hunt on double-crested cormorants (*Phalacrocorax auritus*) where a hunter can take 15 birds per day. As ecologists, fisheries scientists and natural resource managers, we are concerned at the lack of scientific examination associated with the announcement. The hunt originates from, and is regulated, by the Ministry of Natural Resources and Forestry (MNRF) whose mandate is to “sustainably manage Ontario’s fish and wildlife resources” and as such, the justifications provided for cormorant management should be science-based and backed by rigorous analyses. To sustainably manage a resource, populations objectives must be identified¹ to ensure persistence of the population through time.

No rationale is provided as to why a provincial wide hunt is being adopted instead of targeted localized management approaches.² This is especially important for addressing fish populations believed to be impacted by cormorants and impacts to habitat because, if they are occurring, such impacts are a result of site- and time-specific conditions. The U.S. Environmental Impact Statement on cormorant control rejected hunting as an option noting, “The proposed action [depredation orders] is preferable to hunting largely for ethical reasons. From purely biological and economic perspectives, hunting might prove an effective way to kill numerous DCCOs at minimal expense to the government. However, we have serious reservations about authorizing a

¹ Connelly, J.W., J.H. Gammonley and J.M. Peek 2005. Harvest Management. In: Techniques for Wildlife Investigations and Management. C.E. Braun, Grouse Inc and School of Natural Resources, University of Arizona (Eds). The Wildlife Society, Maryland.

² See Ontario Ministry of Natural Resources. 2006. Review of the status and management of double-crested cormorants in Ontario. Fish and Wildlife Branch. Wildlife Section. Peterborough, Ontario. 76 p.

non-traditional species to be hunted when it cannot be eaten or widely utilized and feel that there are more responsible and socially acceptable ways of dealing with migratory bird conflicts.”³

This hunt departs from two of the seven principles of the North American Model of Wildlife Conservation.⁴ First, that wildlife should only be killed for a legitimate, non-frivolous purpose. Second, that scientific management is the proper means for wildlife conservation.⁵

The hunt is problematic on many other fronts. While the announcement provided an estimate of the 2019 breeding population of cormorants, no assessment was provided that identified the replaceable and sustainable level of cormorant harvest. If 0.5% of small game hunters reached the daily limit for ten days that exceeds the estimated breeding population in Ontario.⁶ Further, there was no indication that reporting by hunters will be required, so how will the numbers of cormorants taken in a fall harvest be assessed?⁷ Without such reporting, two factors are of concern. The first is the inability to coordinate total numbers of cormorants killed with the U.S. Fish and Wildlife Service on their proposed and probable control efforts.⁸ Second, there will be no data on the incidental take of migratory species that look similar to double-crested cormorants in flight such as the common loon (*Gavia immer*).⁹

The fall harvest was stated to “...help address concerns about impacts to local ecosystems by cormorants, a bird that preys on fish, eating a pound a day, and that can damage trees in which they nest and roost.” Yet, the approaches used to assess cormorant-fisheries interactions¹⁰ indicate that the MNRF will be unable to assess how the removal of an unknown number of cormorants from locations where no problems may even exist will be linked to the state of

³ U.S. FWS 2003. Environmental Impact Statement: Double-crested cormorant management. Quote is from pg 107, chapter 4, section 4.3.6 Alternative F: Regulated Hunting Season.

<https://www.fws.gov/migratorybirds/pdf/management/double-crested-cormorants/CormorantFEIS.pdf>

⁴ Organ, J.F., V. Geist, S.P. Mahoney, S. Williams, P.R. Krausman, G.R. Batcheller, T.A. Decker, R. Carmichael, P. Nanjappa, R. Regan, R.A. Medellin, R. Cantu, R.E. McCabe, S. Craven, G.M. Vecellio, and D.J. Decker. 2012. The North American Model of Wildlife Conservation. The Wildlife Society Technical Review 12-04. The Wildlife Society, Bethesda, Maryland, USA.

⁵ Organ et al. 2012. n. 4 above.

⁶ There is an estimated 197,000 small game licence holders in ON; 0.5% = 1000 hunters*15 birds*10 days.

⁷ It is inadequate to simply count nests in the following cycle because young of the year and non-breeders will be part of the harvest and cormorants have delayed reproduction.

⁸ Proposed Rule, Migratory Bird Permits: Management of Conflicts Associated with Double-Crested Cormorants (*Phalacrocorax auritus*) Throughout the United States, and the supporting Draft Environmental Impact Statement, Management of Conflicts Associated with Double-Crested Cormorants.

<https://www.federalregister.gov/documents/2020/06/05/2020-11988/migratory-bird-permits-management-of-conflicts-associated-with-double-crested-cormorants>

⁹ See also Ontario Ministry of Natural Resources. 2006. The OMNR notes that the population of Great cormorants (*P. carbo*) declined by 50% during a double-crested cormorant hunt in PEI. Pg 52

¹⁰ Wires, L. R. 2014. The Double-crested Cormorant, Plight of a Feathered Pariah. Yale University Press. This peer-reviewed book provides an excellent summary of the approaches required to study fisheries and cormorant interactions as well as a summary of related studies up to 2014. To assess cormorant impacts “requires a variety of data on both cormorant and fish populations” and the “impacts result from site-and time-specific conditions, and so results from one location or time period should not be extrapolated to another.” Wires also emphasizes that studies “may be confounded by simultaneously occurring changes in aquatic systems.” Pg 220.

various fish populations across Ontario. On that basis alone, targeted, localized management approaches must be adopted instead of a hunt.

Minister Yakabuski, we call on you and the MNRF to provide a science-based, detailed and peer-reviewed approach to resolve conflicts with cormorants. At a minimum, the report should include:

- Data on Ontario's cormorant population (numbers of breeding birds and colonies) and population goals, including analyses on various take levels, the incorporation of ongoing management activities in the province (e.g., cull on Middle Island Point Pelee National Park¹¹) and an estimate of how the population will respond to targeted localized management actions to ensure a sustainable population.¹²
- Detailed rationales and objectives for proposed localized management activities¹³.
- An explanation on how the MNRF will coordinate with the U.S. Fish and Wildlife Service in managing the interior and migratory population of cormorants.

Cormorants are a species native to Ontario.¹⁴ A significant amount of financial resources was invested in creating a healthier environment which allowed them to recover; their abundance is a conservation success story.¹⁵ To avoid the species becoming endangered again, the population needs to be managed using the best practices in wildlife management and their populations carefully monitored, particularly in conjunction with the USFWS. A hunt is not the approach that should be utilized to ensure maintaining a sustainable population of cormorants in Ontario.

Sincerely,

¹¹ Dobbie, T and J. Kehoe 2012. Point Pelee National Park of Canada Middle Island Conservation Plan Summary Report 2008-2012. Parks Canada.

¹² Connelly et al. 2005. n.1 above

¹³ Culling for example. See n. 9 above.

¹⁴ Dorr, B.S., J.J. Hatch and D.V. Weseloh 2014. Double-crested cormorant (*Phalacrocorax auritus*), v. 2. In *The Birds of North America* (P.G. Rodewald, Ed.). Cornell Lab of Ornithology, Ithaca, New York. McIlwraith, T. 1894. *The Birds of Ontario*. Briggs, Toronto.

¹⁵ Weseloh, D.V. and B. Collier 1995. The rise of the double-crested cormorant on the Great Lakes: Winning the war against contaminants. Environment Canada, Great Lakes Fact Sheet.

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