



December 20, 2018

FOCA provides the following Comments related to the proposed double-crested cormorant hunt in Ontario **EBR Registry Number: 013-4124**

<https://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTM2NTE1&statusId=MjA4MDQ4>

FOCA is the Federation of Ontario Cottagers' Associations, a member-based organization representing over 500 local community groups across rural and northern Ontario. Waterfront property owners represent one of the single largest rural constituencies – over 250,000 families, located in hundreds of Ontario municipalities and who collectively own and steward 15,000 kilometers of the Province's shorelines, and over 50,000 hectares of economically and environmentally important lands.

FOCA's members are local stakeholders, landowners, and outdoor enthusiasts, and are involved and interested in the state of our waterways, shorelands and our biodiversity. As members of Ontario's Biodiversity Council FOCA maintains an active role in promoting thriving ecosystems and sound policy when it comes to managing our lands, waters and wildlife.

FOCA has some significant concerns with the proposal which we outline, below.

As representatives of rural and waterfront families, FOCA has some fundamental safety concerns about this proposal. The proposal allows for unrestricted shooting in Ontario, both in terms of season and location. An open season especially during the busy spring summer and fall seasons poses a significant public safety risk. The proposal to permit hunting from a motorboat in particular increases the risks to rural residents, boaters and other water enthusiasts.

FOCA's mission is *To protect thriving and sustainable waterfronts across Ontario*. As part of achieving this, FOCA recognizes that wildlife biology can be complex and by definition the management of species in complex systems requires careful consideration and the use of the best available science. This proposal should be science-based.

We also appreciate that there are concerns about double-crested cormorants and their local impacts, including from some of our members. With respect to the proposed policy and changes to the Fish and Wildlife Conservation Act and related regulations:

The proposal does not appear to include an ecosystem-based approach to wildlife population. The proposal fails to quantify the potential impact of the hunt on the population of Double-crested Cormorants in Ontario, or the potential impact on other wildlife species which could be affected. There are a considerable number of other bird species which could be disturbed from humans on or near colonies; and hunting activities will be detrimental to wildlife adjacent to cormorant populations.

Among other things, there appears to be no population management objective (population target) provincially or regionally. From the proposal, the objective of reducing overall populations (from what number, to what target number?) seems unsupported by the MNRF's existing data that indicates that the species' population is already stable or declining.

Nor does it describe a timeframe over which the proposal would be in place. The MNRF should have a full and detailed rationale to provide justification for this proposal, including population level targets, describing how the cormorant population will be monitored (and this monitoring funded) to determine effects of the hunt and an evaluation of the negative impacts on non-target species. Should this proposal proceed, how will the impact on other species be monitored?

Non-lethal management, deterrence and knocking down nests are not considered in this proposal, though according to the literature on the subject, these local, small scale management (such as deterrence and targeted culling) may be most appropriate.

Nesting failure caused by a cull may result in the dispersal of adults to other sites, and to the establishment of new colonies. There is no mention of this risk in the proposal.

There may be significant rationale for MNRF to consider a more tightly controlled, focused management approach, which would include the opportunity to consult the public. Such targeted local action would allow for data to be collected (i.e., date, location, the number of birds shot); a target of the number of birds to be killed would be articulated; and disposal would properly occur, versus the current proposal which allows for spoilage of dead birds.

We hope that these comments are useful and will help to develop a more robust management strategy for cormorants in Ontario

Terry Rees
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