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**TO:** Honourable David Ramsay  
Minister of Natural Resources

**c.c.** Ms Gail Beggs, Deputy Minister  
Mr. Kevin Wilson, Assistant Deputy Minister  
Ms. Deb Stetson

**FROM:** Liz White, Animal Alliance and Ontario Wildlife Coalition,  
Barry MacKay, Animal Protection Institute,  
Melissa Tkachyk, Earthroots,  
Ainslie Willock, Canadians for Snowgeese and Canadians for Bears  
Stephen Best, Environment Voters  
Donna DuBreuil, Ontario Wildlife Coalition  
Peaceful Parks Coalition  
Paul and Debbie Harris, Volunteer Wildlife Custodians  
Melissa Ryall and Julie Woodyer, Zoocheck Canada

**SUBJECT:** Comments on the Ministry of Natural Resources document titled,  
Living With Wildlife: Toward an Ontario strategy to manage human-  
wildlife conflicts (Draft – July 27, 2005) a regressive approach to  
developing a human-wildlife conflict strategy for Ontario

**DATE:** September 28, 2005

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Dear Mr. Ramsay,

We are writing to you to express our concerns about the Ministry's background document, *Living With Wildlife: Toward an Ontario strategy to manage human-wildlife conflicts*. The strategy is heavily weighted toward negative assessments and solutions for human-wildlife conflicts and ignores a very progressive approach to human-wildlife conflicts developed in the late 1980s under the previous Liberal government as set out in the document, "Looking Ahead: A Wild Life Strategy for Ontario".

As well, the consultation process to date has excluded all the organizations who have opposed the Ministry's approach to species it classifies as "over-abundant".

**Recommendations: Therefore, we recommend that the Ministry:**

- 1) scrap the *Living With Wildlife* discussion document;
- 2) return to the Ontario Wildlife Working Group's report *Looking Ahead: A Wild Life Strategy for Ontario* as the foundation for the Ontario human-wildlife conflict strategy that was based on a wide consultation process that is now being ignored;
- 3) commit to developing a human-wildlife conflict prevention strategy that is humane, ethical, cost-efficient and effective such as the Ministry has done with its Bear Wise programme; and
- 4) agree to consult broadly.

**Overview:**

The loss of political leadership within the Ontario Government on behalf of progressive environmental goals is evident by contrasting the recent announcement by the Ministry of Natural Resources for a "Nuisance Wildlife Strategy" with a similar undertaking by another Liberal government fifteen years ago.

In the late 1980s a Liberal government, with Lyn McLeod as Minister of Natural Resources, undertook a broad and inclusive public consultation that resulted in a report, "Looking Ahead: A Wild Life Strategy for Ontario". The consultation and the Report's recommendations were endorsed by a wide range of environmental, animal protection and conservation organizations as a progressive new direction that had reached consensus with consumptive users, as well.

In quoting from the Report, it states "The Strategy poses a number of challenges to the people of Ontario and their government. It calls on them to accept responsibility for the stewardship of all living nature. We have highlighted this challenge by replacing the word "wildlife" with "wild life" to symbolize the broad definition we recommend be adopted. We urge the implementation of the Strategy through an ecosystem approach to ensure the conservation of the diversity of life in Ontario. The Working Group believes that the time has come to demand a more responsible and respectful attitude toward nature, at all levels from the total environment to individual plants and animals."

The Strategy was solidly anchored in recognizing the importance of biodiversity; in understanding the substantial and negative impact of urban development on wildlife and wildlife habitat along with the responsibility for mitigating that impact; in maintaining wild life habitat diversity on agricultural lands in a manner compatible with agricultural practice; in developing a comprehensive strategy and program to address human-wild life conflicts with emphasis on public education and extension programs. Workshop participants, for example, endorsed the view that the subjective and outdated term "nuisance wildlife" be replaced by the term "human/wild life conflict" in dealing with wild life problems that, for the most part, were caused by human actions.

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Unfortunately, the former Liberal government's attempt to use the Report to bring the provincial wildlife program into the 21st century by re-orienting and revitalizing its direction failed due to a change in government, lack of leadership within the Ministry, and resistance by those MNR staff who represented the interests of a narrow group of clients.

Now, fifteen years later, the MNR is attempting to impose a human-wildlife conflict strategy that is decidedly negative and dated in its approach.

The invitation to a restricted number of stakeholders to a meeting scheduled less than a month later on September 14 and 15 was mailed on August 16. It requested confirmation of attendance by the following week. Conspicuously absent are any organizations that have publicly challenged MNR wildlife policies with respect to a number of highly contentious public issues these past few years; these organizations include Animal Alliance, the Animal Protection Institute, the Bear Alliance, Canadians for Bears, Canadians for Snowgeese, Earthroots, Environment Voters, International Fund for Animal Welfare, Ontario Wildlife Coalition, Ottawa-Carleton Wildlife Centre, Peaceful Parks Coalition, Pro-Nature Network, Volunteer Wildlife Custodians and Zoocheck Canada.

A coalition of animal protection and environmental organizations have come together to assess the proposed human-wildlife conflict strategy and offer the Minister advice as to how to proceed.

#### **Areas of Concern with the Living With Wildlife document:**

##### ***1. Terminology:***

- a. Despite platitudes about the importance of wildlife to the ecosystem, the "Living With Wildlife" document negatively portrays many wild species as "nuisance animals" who pose human health and safety risks, who cause economic and productivity loss and who negatively impact societal and cultural values. By this description most mammals would be considered "nuisance" at some time. The terminology in describing "nuisance" wildlife in this document is generally negative. The activities of the animals are given a negative value with little or no consideration given to their positive values.
- b. The Ministry's term "cultural carrying capacity" is largely used to describe the level of tolerance of some people who come into conflict with those "nuisance" animals. The Ministry uses this term to justify lethal wildlife management techniques as the preferred control method without any consideration of the validity of the concern or alternative solutions.

##### ***2. Approach:***

- a. Consumptive use - hunting as a management tool: The Ministry states that hunting has been the primary method of wildlife management. The Ministry argues that there are wildlife management consequences with "nuisance wildlife" because of the decline in the number of hunters and because many landowners and municipalities prohibit hunting. In fact, wildlife management is necessary to regulate and prevent the negative impacts of hunting, trapping and fishing and other consumptive wildlife activities on wildlife populations. Non-consumptive wildlife activities, which are on the increase in Ontario tend to be more benign, requiring less "management".
- b. No consideration given to conservation efforts of non-consumptive users: Again, this document fails to recognize the contribution of non-consumptive wildlife users to conservation. And although the report acknowledges that "involvement in wildlife

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organizations is one of the fastest growing wildlife-related activities" it does not acknowledge that most if this growth is connected with non-consumptive programmes and activities.

- c. No real solution: Instead of developing an effective, cost-efficient, ethical and humane solution for human-wildlife conflicts, the Ministry is promoting traditional lethal wildlife control methods such as increased bag limits, extended hunting seasons and special hunting seasons in specific Wildlife Management Units (WMU).

### **3. Definitions:**

- a. The document fails to define key expressions such as "cultural carrying capacity", "nuisance", "significant losses", "abundant wildlife" and "invasive species". The document incorrectly defines invasive species as "the range expansion of native wildlife", a definition not supported by the Biodiversity Strategy or the Wild Life Working Group report and is at odds with the basics of wildlife population dynamics.

### **4. Lack of references:**

- a. The Ministry claims that deer populations have increased 3-4 times since 1980 and Canada goose populations have increased 5 times between 1985 and 1996. No references are given for these statistics.
- b. The Ministry claims that wildlife related vehicular claims are on the increase relative to the increase in collisions. The Ministry adds that these collisions add additional costs to hospitals and health care, cause lost days of employment and are responsible for untold emotional impacts. The Ministry provides no references for these statements. Further, the Ministry does not address the vehicular problems resulting from such issues as the location of highways, road design, speed, traffic and hunting where deer and other large animals are chased across roads.
- c. The Ministry sites a Transport Canada report which claims that between 4-8 large animal-vehicle collisions take place every hour in Canada. The report is not available on the Transport Canada's web site so an evaluation of the report cannot be made at this time. However, questions need to be raised concerning the report. How many of the "large animals" were wild and how many domestic; what is considered a large animal; what percentage of accidents were minor, moderate and major; did they occur in specific areas of the country and were there increases and decreases depending on the season?

### **5. Involvement of other ministries:**

- a. The Ministry of the Environment should be included.
- b. The document does not address the fact that policies and practices of the other ministries contribute to human-wildlife conflicts and fails to require policy changes by other ministries to begin to reduce such conflicts.

### **6. Assertions:**

- a. The Ministry claims that wildlife damages to Ontario farmers is a concern given the challenges facing the agriculture industry. The claim of \$50 million (damages and prevention costs) in costs to the farmers is referenced. However, the Ministry does not make any attempt to evaluate the cost to the farmer which on average is approximately \$1,000. In an April 27, 2004 report prepared for the Ontario Soil and Crop Improvement Association, Nancy Tilt, the author, writes, "One of the most challenging factors in developing a compensation program for Ontario producers deals with



the distribution of wildlife damage. Of 347 field crop producers in the 1999 survey sample, 30% reported crop damage; 70% did not. Of those reporting damage, 85% indicated yield loss values of less than \$5000, another 14% reported between \$5000 and \$15,000 losses, and 1% reported over \$40,000 loss. In other words, most producers have relatively few problems, but when they do occur, they can be severe.” (Wildlife Damage Who Should Pay?)

More telling is the breakdown of the money spent by farmers on wildlife damage preventive measures. The \$7.5 million cited in the report is on average \$150 per farmer, hardly a significant investment when you consider that all business have responsibility for protecting their assets.

#### **7. Regression and exclusion:**

- a. The 1990 Ontario Wildlife Working Group recommended that the Ministry recognize and foster a wild life rehabilitation program in Ontario, creating a legitimate basis for animal rehabilitation. It suggested “consideration be given to the establishment of a network of reception centers around the province to provide facilities for the public to take sick, injured, and orphaned wild life, and to serve in the referral of these animals to qualified private rehabilitators and capital funding and some operating costs (on a matching basis) of reception centers and for educational programs and materials for rehabilitators and the general public.” Despite the work done in the early nineties, current Ministry staff do not even discuss the need for an active and robust wildlife rehabilitation programme, even though rehabilitators are the front line workers who address and often resolve human wildlife conflicts and who provide help for sick, injured or orphaned wildlife. In fact, the Ministry’s current and proposed regulations with respect to wildlife rehabilitation have eliminated humane, responsible, or internationally accepted standards for wildlife rehabilitation in Ontario, a situation that is producing universal public condemnation.

#### **8. Strategy to benefit OMNR “customers” and other ministries, not wildlife and not the public:**

- a. The proposed strategy is designed to benefit OMNR customers and clients who are largely consumptive users, and other ministries. OMNR clients include anglers, hunters, outfitters, and landowners who regard wildlife as “nuisance”. The development of a negative human-wildlife conflict strategy is also designed to appease other ministries, particularly OMAFRA whose client base is vocal about the impacts of wildlife on agriculture.

#### **9. Hypocrisy:**

- a. Deer: For some reason deer are singled out in a document that claims to embrace the biodiversity strategy. It appears that a “nuisance deer strategy” will be developed separate from the current proposed strategy. Why are deer being treated differently from other wildlife? Why is a separate strategy being developed? And why is the Ministry, who is clearly concerned with the size of the deer population in Ontario still advocating the feeding of deer in the winter?
- b. Invasive Species: The Ministry cites concerns with the introduction of invasive species into the environment, while the Ministry is involved in the release of such species itself. The Ministry has active programmes to introduce non-native fish including salmonids and splake for the anglers and turn a blind eye to the release of other non-native species such as pheasant, Chukar and Bob-white quail for the hunters. Further, the Ministry has regular fish stocking programmes in lakes throughout Ontario without environmental impact studies on those aquatic ecosystems.



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**Conclusion:**

Reviewing the Ministry's record these past fifteen years, there has been little progress in reflecting the broader society's view of wildlife. In fact, given the recommendations of the 1991 Report where there was wide public consultation, there has been considerable regression.

Sincerely,

Liz White, Director

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