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VIA FAX AND ONLINE SUBMISSION, 1 of 4 pages

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RE: The Proposed Changes to Wolf and Coyote Hunting Regulations in Northern Ontario; EBR 012-6073

Animal Justice Canada Legislative Fund (**"Animal Justice"**) is Canadian non-profit dedicated to animal law; we work to secure legal protections for animals.

Animal Justice appreciates this opportunity to provide comments regarding the Ministry of Nature Resources and Forestry (**"MNRF"**) proposed changes to the regulations under the Fish and Wildlife Conservation Act, S.O. 1997 (**"FWCA"**).

Regulation Changes

As you are aware, the proposed amendments to Ontario Regulation 665/98 under the FWCA are as follows:

a) Removing the game seal requirement for wolves and coyotes in northern Ontario and allowing hunting with a small game licence;

b) Replacing the two seal limit in northern Ontario with an annual harvest limit of two wolves per season;

c) Allowing unlimited coyote harvesting in northern Ontario;

d) Modifying reporting requirements to include mandatory reporting of the harvest component only (rather than hunting activity), throughout all parts of northern and central Ontario where mandatory reporting is currently required.

Provided Justification

The MNRF provides several justifications for the proposed changes to the wolf and coyote hunts, emphasizing conservationist concerns and claiming the measures are necessary given the impact of wolf depredation on declining caribou populations in northern Ontario. Similarly, the MNRF claims that the proposed changes will work to ensure the sustainability of wolf and coyote populations in northern Ontario, while preserving protections for the at risk Eastern wolf population in central Ontario. The MNRF also justifies the changes as being in response to hunters' concerns over the present seal requirement.

Commentary

Animal Justice submits that the proposed amendments are contrary to the province's conservationist goals, failing to address the declining moose population, and threatening to destabilize wolf and coyote populations. Animal Justice also submits that the welfare of wolves and coyotes must be taken into consideration.

Increased Hunting Threatens the Conservation of Moose, Wolves and Coyotes

Ontario's declining moose population has re-emerged as an area of concern in recent years. Though Ontario's moose population has remained "healthy overall", several areas in northern Ontario have seen a noticeable decrease in moose numbers.[1] Though no single factor has emerged as the chief cause of this decline, an Ontario government website observes that the moose population in southern Ontario, where hunting seasons are "very limited" has "fared better" than in northern Ontario where hunting seasons are longer.[2] Indeed, the government site identifies the central concerns with the declining moose population as being the low numbers of calves entering breeding age, and "the breeding period for moose, relative to the timing of hunting seasons."[3] Given that Ontario permits the hunting of moose calves, both concerns are clearly linked to the moose hunt. Beginning this year the MNRF shortened hunting seasons in northern Ontario to protect the moose population.[4] Though the moose hunt may fail to fully account for the declining numbers of moose (climate change and habitat destruction have been identified as other casual factors), the moose hunt is a significant contributing factor that could easily be controlled by ending the moose hunt, including the calf hunt.

Conversely, killing more wolves and coyotes through hunting will likely have little to no effect on moose numbers while increasing gray wolf and coyote populations, and threatening eastern wolf populations. Regarding the first point, decades of research on predator management programs across Canada have shown that these programs fail to create long-

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[1] Ontario Government, "Factors that affect moose survival" (Fact Sheet) (1 October 2015), online: <https://www.ontario.ca/page/factors-affect-moose-survival>.
[2] *Ibid.*
[3] *Ibid.*
[4] Ontario Government, "Moose population management" (Fact Sheet) (17 December 2015), online: <http://www.ontario.ca/page/moose-population-management>.

term ungulate population growth.[5] Targeting a few predator species to combat moose population decline fails to acknowledge that other animals, such as black bears also prey on moose and may even have a greater impact on moose numbers than the targeted predator species. The raw number of moose killed by wolves also does not accurately reflect the impact of such predation; the impact of wolves on moose populations is moderated by the fact that wolves are unlikely to hunt breeding-aged moose except in circumstances where hunting has resulted in fewer calves and elderly moose.[6] Additionally, changing hunting and trapping regulations to allow a greater wolf harvest will not decrease overall predation on moose as the number of moose wolves kill correlates with moose density, not the size of the wolf pack.[7] Finally, increased lethal control of wolves may simply lead to their role in moose fatalities being taken on by other predator species in the area, or "immigrating" wolves from other regions. Thus, moose will not benefit from increased wolf slaughter.

With regard to the second point, studies indicate that increased lethal control destabilizes pack structure, leading to a rise in the number of sexually mature wolves breeding, larger litter sizes, and a resultant increase in hunting.[8] Coyotes have similar pack structures to wolves, and similarly experience higher reproductive rates when faced with increased lethal control.[9] Attempts to control coyote population levels through lethal control have proven futile as coyote populations are able to fully recover following a 75 percent reduction in population.[10] Thus, hunting may actually serve to ultimately increase the number of wolves and coyotes in Ontario.

Last, although the government plan claims that eastern wolves will remain protected, permitting the expansion of the coyote and wolf hunts will invariably lead to more eastern wolves being mistakenly shot as eastern wolves are frequently mistaken for coyotes.[11] Indeed, hunting and trapping had to be completely prohibited in the 30 townships around Algonquin Provincial Park to effectively protect eastern wolves.[12] Given that eastern wolves have been assessed as a species of special concern due to their dwindling numbers, the Ontario government has an obligation to pay particular attention to the threat posed to them by this plan.

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[5] *Supra,* at note 1.
[6] *Ibid.*
[7] *Ibid.*
[8] RB Wielgus and KA Peebles, "Effects of Wolf Mortality on Livestock Depredations" (2014) 9:12 PLoS ONE e113505.
[9] Alberta Agriculture and Rural Development, "Coyote Predation Control Manual and Study Guide" (March 2010), online: <http://www1.agric.gov.ab.ca/general/progserv.nsf/all/pgmsrv403/$FILE/manual-study-guide.pdf> at 8.
[10] *Ibid.*
[11] Ontario Ministry of Natural Resources, "Backgrounder on Wolf Conservation in Ontario" (June 2005), online: <http://www.web2.mnr.gov.on.ca/mnr/ebr/wolves/backgrounder.pdf> at 6.
[12] Richard P Thiel and Adrian P Wydeven, "Eastern Wolf (Canis lycaon) Status Assessment Report" (November 2011), online: <http://www.fws.gov/midwest/wolf/aboutwolves/pdf/thielwydeveneasternwolfstatusreview8august12.pdf > at 46.

Thus, the moose, wolf or coyote populations cannot be effectively managed through the liberalization of the wolf and coyote hunts.

Wolf and Coyote Interests

Wolves and coyotes are both pack animals with complex social relations. Killing members of a pack disrupts pack cohesion and impedes social learning, causing group instability and creating changes in breeding patterns (as outlined previously). A recent study of wolf populations across Canada has shown that wolves from areas where they are heavily hunted have higher levels of stress hormones, potentially leading to changes in the health and behaviours of both these individuals and their offspring, including changes in reproductive rates.[13] As wolves (and coyotes) are keystone species, such changes would likely majorly impact the ecosystem and in ways that are difficult to predict and therefore manage. Moreover, wolves and coyotes have an interest in living their lives and not being cruelly and needlessly killed.

Conclusion

Given that the liberalization of hunting policies on wolves and coyotes will create both conservation and animal welfare concerns, Animal Justice recommends alternative strategies be utilized. Conservation of moose populations may be achieved by focusing on the human causes of population decline: hunting seasons that enable hunters to shoot moose as well as their young, habitat destruction, and climate change. Scapegoating moose's natural predators will simply serve to further destabilize Ontario's ecosystems, bringing no benefit to either moose or the environment. Accordingly, an approach that focuses on recognizing and responding to human-made contributions to environmental instability is the appropriate course to take. Such an approach will serve conservation goals and demonstrate respect for the life and dignity of all animals in Ontario.

Animal Justice appreciates the opportunity to comment on the proposed changes and hopes that the MNRF will take the concerns highlighted in this submission into consideration in respect of the proposed changes. Please do not hesitate to contact us if you should have any questions.

Yours sincerely,

Camille Labchuk, BA, JD
Executive Director

[13] Heather M Bryan et al, "Heavily hunted wolves have higher stress and reproductive steroids than wolves with lower hunting pressure" (2015) 29:3 Functional Ecology 347-356.