

February 18, 2020

Public Input Coordinator  
Species Conservation Policy Branch - Wildlife Section  
300 Water Street  
5th Floor, North tower  
Peterborough, ON  
K9J 3C7

Dear Public Input Coordinator,

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

We, the forty undersigned organizations, are writing to express our strong opposition to the reintroduction of the spring bear hunt across Ontario. There is no sound rationale to reintroduce the hunt, but there are solid reasons not to, as outlined below.

**Human-bear conflicts**

The ERO posting references two spring bear hunt pilots, an earlier one conducted from 2014-2015 and a current one from 2016-2020, both to assess the impact of the hunt on human-bear conflict. Despite the obvious relevance of the pilots to this proposal, the ministry did not mention or release findings from those studies. We understand that findings from the first pilot were never released and that the 2016 pilot (which saw the spring bear hunt expand from eight to 88 Wildlife Management Units) hasn't yet concluded. Consequently, the results which should accompany any decision about continuing the hunt are not publicly available. We further understand that the pilots have so far confirmed what Ministry of Natural Resources and Forestry (MNR) biologists already knew and presented in a peer-reviewed journal<sup>1</sup> in 2014 - i.e., that the spring hunt would have no positive impact on human safety. For transparency and to inform public comment on this proposal, the ministry should have released relevant findings from the pilots.

The public has a right to know that the human safety argument, often made by proponents of the spring bear hunt, has no merit. After Ontario's spring bear hunt was cancelled in 1999 MNR established an independent Nuisance Bear Review Committee to review the issue. In its 2003 report, the committee concluded that "there was no evidence that spring harvest reduced nuisance bear activity." Other studies likewise point to the lack of evidence demonstrating that hunting is an effective means of reducing human-bear conflict.<sup>2</sup>

**Economic benefit and certainty**

The ERO posting states that the economic consequences of the spring bear hunt are "expected to be neutral to positive," but provides no information to back that claim. It is highly

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<sup>1</sup> Obbard, Martyn E. et al. (2014), "Relationships among food availability, harvest, and human-bear conflict at the landscape scales in Ontario, Canada," *Ursus* 25(2): 98-110.

<sup>2</sup> See Garshelis (1989), "Nuisance bear activity and management in Minnesota," M. Bromley Ed. *Bear-people conflicts: Proceedings of a symposium on management strategies*: 169-180; and Treves et al. (2010), "Hunting for large carnivore conservation," *Journal of Applied Ecology* 46: 1350-1356.

unlikely that there would be any significant financial benefit. Rather, those who used to hire outfitters in the fall to hunt black bears would be hiring them in the spring instead. A spring season would simply move money spent in Ontario from fall to spring.

The ministry's chief argument for the spring hunt seems to be that moving from a temporary pilot to permanently reinstating the hunt will address uncertainty. But of course, permanently cancelling the hunt would provide the same level of certainty. This argument has no merit.

### **Opposition to the spring bear hunt**

The ERO posting states that the social consequences of the proposal are expected to be both positive and negative but fails to acknowledge a key negative social impact: that thousands of Ontarians are opposed to the spring hunt. The ministry has chosen to ignore public sentiment on this issue.

Our organizations are not opposed to hunting if it is conducted in a sustainable and ethical manner. But this is not the case with the spring bear hunt. Most participants are non-residents who hunt by baiting bears, and many of these hunters, even at bait stations, are unable to distinguish between male and female bears. An Ontario study of bait hunting conducted by MNRF biologists indicated that important descriptors for assessing sex (enlarged nipples, penis, neck size and shape, body shape and proportions) “were infrequently or never used by hunters.”<sup>3</sup>

Females have been and will continue to be killed during the spring bear hunt, including nursing mothers. As a result, orphaned cubs – about five to six months old and typically weighing about five kilograms – starve to death or are killed by other predators. This is an ethical issue – clearly recognized as such not only by the public, but by the government itself which prohibits the killing of females accompanied by cubs. The problem with the government's approach, however, is twofold. First, it does nothing to protect nursing mothers unaccompanied by young cubs who are often sent up trees while their mother forages for food. Second, despite the threat of large fines, this prohibition is unenforceable: a hunter simply has to state that no cubs accompanied the female when she was shot approaching the bait site, and no charges would be laid or would be successful in court.

### **Spring bear hunt on the Saugeen-Bruce Peninsula**

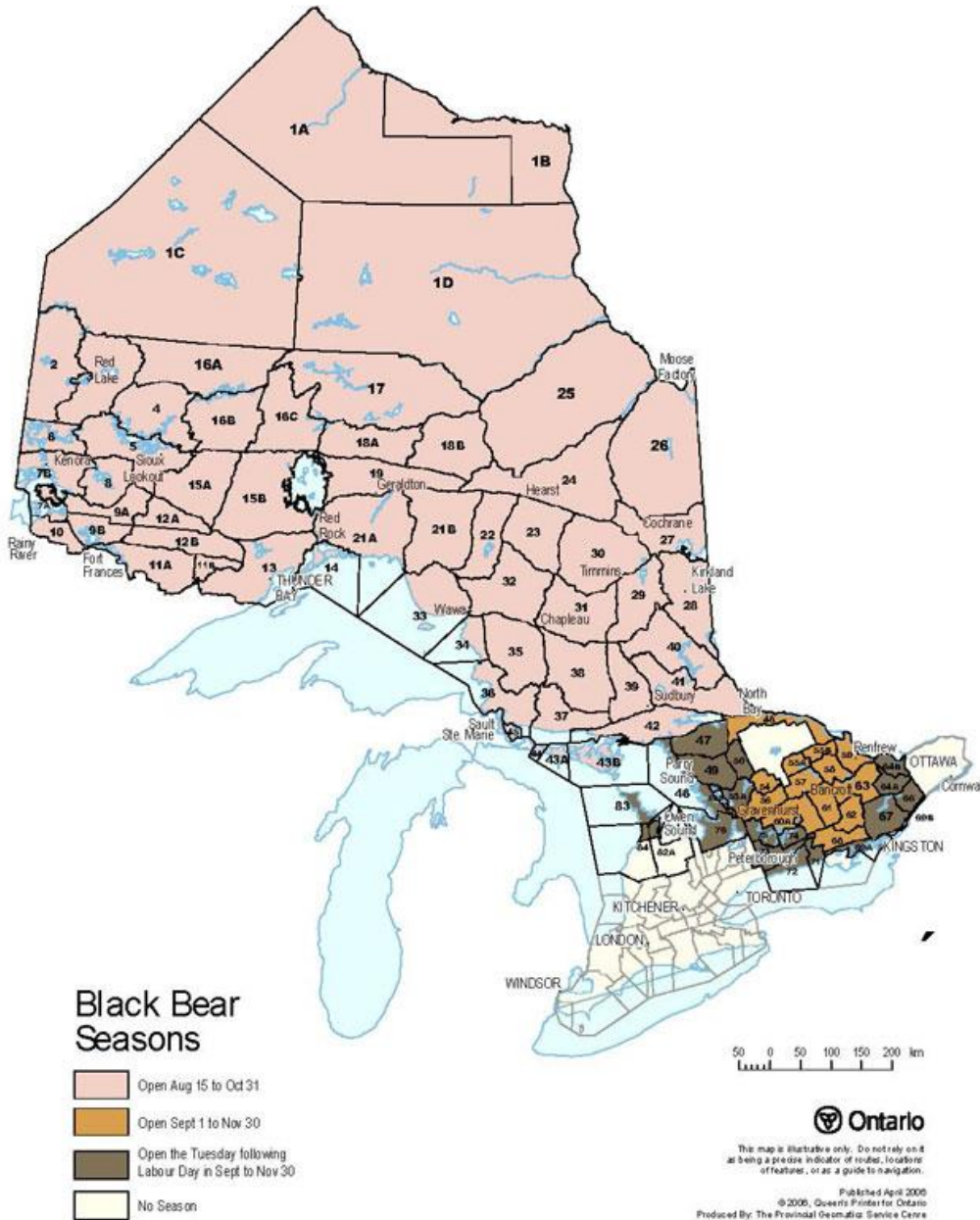
The ERO posting states that there has been a decline in black bear numbers on the Saugeen-Bruce Peninsula and that “human-caused mortality should be reduced to support sustainability of this genetically isolated population.” Accordingly, the ministry is proposing to close the fall black bear hunt in this area and to limit the spring hunting and trapping season to one week.

We fully support the overall intention to reduce human-caused mortality, and the proposal to close the fall season. There are ample opportunities to hunt black bears in nearby areas and across the province in the fall (see map below). However, for the same reasons, there should be no spring hunt. Any human-induced mortality will only act to reduce the genetic diversity of

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<sup>3</sup> Obbard, Martyn E. et al. (2008), “Suspended baits: Can they help hunters distinguish male from female American black bears?” *Ursus* 19(1): 33 – 42.

this isolated population<sup>4</sup> that is known to be in decline. All seasons should be closed completely on the Saugeen-Bruce Peninsula.



We, the undersigned, acknowledge and respect the Aboriginal and Treaty rights that are recognized and confirmed in Section 35 of the *Constitution Act, 1982*. We expect that MNR would be consulting with Saugeen Ojibway Nation and all affected First Nations on this issue

<sup>4</sup> Regarding genetic isolation of this population and the need for conservation measures, see Agnès Pelletier et al. (2017), "Determining causes of genetic isolation in a large carnivore (*Ursus americanus*) population to direct contemporary conservation measures," *PLOS ONE* | DOI:10.1371/journal.pone.0172319.

and will make every effort to address consent and accommodate their rights and interests, including not only their right to harvest bears but also to maintain and restore their cultural and spiritual relationships with them.

In closing, we urge the ministry to abandon its proposal to reintroduce the spring bear hunt. There is no need for the hunt. The human safety argument has been soundly refuted, and the economic and 'certainty' arguments are unfounded.

Thank you for this opportunity to comment on the proposed policy.

Yours truly,

**Anne Bell**

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and Education  
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*Director General, Ontario  
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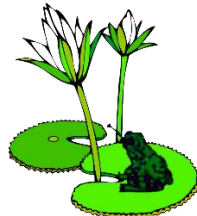
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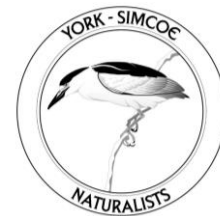
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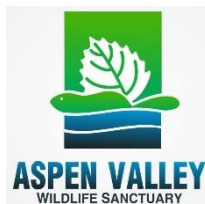
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