

18 February 2020

Public Input Coordinator
Species Conservation Policy Branch - Wildlife Section
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Peterborough, ON
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Canada

.Dear Public Input Coordinator

Re: ERO #019-1112 Proposed Changes to Black Bear Hunting Regulations.

Re: Proposal to implement a regular spring black bear season and shorten the Bruce Peninsula black bear hunting season.

I am writing to oppose the implementation of a regular spring black bear season in Ontario, and to state that the proposed changes to black bear seasons on the Bruce Peninsula are inadequate. I outline my reasons below.

- 1. Lactating females will be killed in a spring season.** With a spring season for black bears it is inevitable that lactating females will be killed. How many is unknown and was unknown prior to the cancellation of the original spring season in 1999, but it did happen and it will happen in the future. Despite the threat of large fines, regulations prohibiting harvesting of females accompanied by cubs are unenforceable, as they were up to 1999. A hunter, or hunter's lawyer, simply has to state that no cubs accompanied the female when she approached a bait site and was shot and no charges would be laid or would be successful in court. Few charges were laid by OMNR Conservation Officers prior to 1999 because officers knew there was little chance of obtaining a conviction. Nothing has changed to alter that reality – lactating females will be killed during a spring hunt, their cubs will starve to death, or be killed by predators, and no hunter will be charged or convicted. The claim that large fines will ensure no lactating females are killed is a smoke screen. *Regulations to prohibit harvesting of females accompanied by cubs are unenforceable and will be ineffective.*
- 2. Spring season an ethical issue.** Having a spring season does not necessarily create a sustainability issue, though it may if insufficient harvest controls are in effect as is the situation currently in Ontario where there are no quotas for resident hunters and none proposed in ERO proposal 019-1112 . However, a spring season is certainly an ethical issue. Cubs during a spring season are about 5 months old, weigh about 5 kg., and are completely dependent on their mothers. If orphaned in spring, cubs starve to death or are killed by predators such as wolves, coyotes, lynx or other bears. A small research study conducted by OMNR researchers in the early 1980s showed that cubs orphaned

prior to August 1 all died. As Minister Snobelen said in several speeches in 1999, “even the orphaning of one cub in the spring is too many”. Nothing has changed since then. *Most Ontarians consider it unacceptable that young cubs are orphaned in a spring season and left to starve to death.*

3. **Harvest does not reduce human-bear conflict.** Despite the claims of some hunting organizations and of previous Ministers of OMNRF in 2014 when the spring pilot was introduced and in 2016 when it was extended, there is no evidence that harvest of black bears reduces human-bear conflict levels. Rather, variation in availability of natural foods drives black bear demography and human-bear conflict levels via bottom-up ecological processes. OMNRF’s own bear scientist published such results (Obbard et al. 2014. Relationships among food availability, harvest, and human–bear conflict at landscape scales in Ontario, Canada. *Ursus* 25: 98-110.) Similar results have been reported for other jurisdictions such as Wisconsin (Treves et al. 2010. American black bear nuisance complaints and hunter take. *Ursus* 21: 30-42). *Instituting a province-wide spring black bear season cannot be justified as a way to reduce human-bear conflict.*
4. **Little economic return from a spring season.** The argument that a spring season will be an economic boon to northern Ontario is a false one. Following the 1999 spring season cancellation, outfitters adjusted their business model and marketing strategy such that by 2001 or 2002 the fall harvest was similar to the previous combined spring and fall harvests. Re-instituting a spring season did not and will not result in large economic gains to outfitters. If a non-resident hunter previously came in the fall to hunt bears and thereby used the services of an outfitter but now will come to hunt bears in the spring, that hunter will not return to spend more money in the fall. *A spring season mostly moves revenue to outfitters from the fall to the spring with no net gain.*
5. **Suspended baits should be made mandatory.** Research by OMNRF’s own bear scientist showed that even experienced hunters had difficulty correctly identifying the sex of bears coming to bait sites (Obbard et al. 2008. Suspended baits: can they help hunters distinguish male from female American black bears. *Ursus* 19: 33-42.). Results of that study indicated that using baits suspended from a tripod or line between trees, rather than buried in the ground, encouraged a bear to stand at a bait site exposing its ventral surface and providing a hunter with the opportunity to correctly distinguish females from males. It is well recognized that population growth rate in bear populations is most sensitive to survival of adult females. *Therefore, suspended baits should be made mandatory in order to skew the harvest towards males and protect adult females, especially should a spring season be implemented permanently.*
6. **Proposal to protect Bruce Peninsula black bear population inadequate.** The proposed elimination of a fall season and restriction of a spring season to one week on the Bruce Peninsula are a step in the right direction. However, if the government is serious about protecting bears on the Bruce Peninsula it will close the season completely. The ERO proposal states: *Since the mid-2000s there has been ongoing collaborative research conducted on the black bear population on the Bruce Peninsula. Research indicates that there has been a decline in bear numbers and that human-caused mortality should be*

reduced to support sustainability of this genetically isolated population. In fact, OMNRF and Parks Canada began estimating abundance of bears on the Bruce Peninsula in 2001, earlier than suggested in the ERO proposal (Zorn and Quirouette. 2003. Black bear (*Ursus americanus*) population estimate 2001 - Upper Bruce Peninsula. Unpublished report, Parks Canada, Ecological Integrity Monitoring Program, Ottawa, Ontario. 22 p.). As ERO proposal 019-1112 acknowledges, there is strong evidence that the bear population has declined. OMNRF's own research estimated that by 2012 as few as 316 bears (95% CI 225-408) occupied the Bruce Peninsula (Obbard et al. 2016. Estimating the abundance of American black bears (*Ursus americanus*) on the Bruce Peninsula, Ontario. 2016. Science and Research Technical Report TR-13. Ontario Ministry of Natural Resources and Forestry, Peterborough, Ontario. 25 p.). Wildlife management theory indicates that there is no harvestable surplus available from a declining population (Caughley, G. 1977. Analysis of vertebrate populations. John Wiley and Sons, New York. 234 p.). Therefore, by acknowledging that the Bruce Peninsula population has declined, yet proposing a spring season, albeit a short one, the government is ignoring long-established wildlife management principles. In addition, there are major concerns about genetic diversity in the Bruce black bear population, particularly in the matriline. Research conducted by OMNRF provided evidence of reduced mtDNA diversity in the Bruce Peninsula population (Pelletier et al. 2011. Small-scale genetic structure of American black bears illustrates potential postglacial recolonization routes. Journal of Mammalogy 92: 629-644.). Only 2 mtDNA haplotypes were found on the Bruce Peninsula. These were not distinct in the sense that they were found elsewhere in the province; however, the fact that only 2 haplotypes were found on the Bruce out of 36 found elsewhere in the province speaks to the lack of diversity. In a subsequent paper (Pelletier et al. 2017. Determining causes of genetic isolation in a large carnivore (*Ursus americanus*) population to direct contemporary conservation measures. PLoS ONE 12: e0172319.), OMNRF researchers and collaborators speculated that wide spread forest fires on the Bruce in the early 1900s resulted in a large reduction in the bear population leading to the low diversity, which has not recovered, and speculated that periodic introductions of bears from elsewhere in the province would be needed to increase diversity. *The hunting season on the Bruce Peninsula should be closed completely to halt further declines in the number of bears in the population and to halt further declines in genetic diversity which would be a threat to the long-term viability of the population.*