



September 27, 2020

Public Input Coordinator
MNRF Fish and Wildlife Policy Branch – Wildlife Section
300 Water Street, 5th Floor, North Tower
Peterborough, Ontario K9J 3C7

Re: ERO 019-1806: Proposal to expand the live capture of wild raptors (birds of prey) by licensed falconers

Dear Sir or Madame,

Thank you for this opportunity to comment on the proposal contained in ERO 019-1806.

The North American Falconers Association (NAFA) is the largest membership-based falconry organization in the world, and has represented falconers and falconry in Mexico, the United States and Canada since 1961. On behalf of our many members in Ontario and across North America, NAFA asks for approval and implementation of these important improvements to falconry in Ontario.

In 2010 the United Nations Educational, Scientific and Cultural Organization (UNESCO) added falconry, an ancient and traditional hunting method to its *List of the Intangible Cultural Heritages of Humanity*. One of the traditions and heritages of falconry is to be able to capture, train and hunt in partnership with a wild bird of prey.

Wild raptors are very important to the cultural heritage of falconry, and we recognize that since 2011 the live capture of raptors has dramatically improved falconry in Ontario. Unfortunately, the benefits of this policy are unavailable to many falconers, due to the very restrictive quota. No other jurisdiction in North America uses a quota such as this to limit take of common species of raptors. Most US states follow a system similar to what Ontario is now proposing and allow every falconer to capture up to 2 birds per year. Total numbers taken are far below the theoretical maximum, however. For example, in California from 2006-2010, 575 licensed falconers could have taken 1150 birds per year, but on average took on 108 birds per year. Of these 55% were eventually returned to the wild.

After a thorough examination, the United States Fish and Wildlife Service has formally issued a *Finding of No Significant Impact* (“FONSI”) regarding falconry. A quota of the type currently in place in Ontario is simply unnecessary. Therefore, we strongly support the elimination of the “draw” for the 4 common species, as well as inclusion of the capture under regulation. This will provide far greater certainty and greatly improve the apprenticeship program, by ensuring that all apprentices have an opportunity to capture a red-tailed hawk.

We also support the proposed inclusion of a limited take of northern goshawk. This is one of the most important species in falconry. It has been a key falconry species for thousands of years across the northern hemisphere. Fortunately, the goshawk is very widespread, and is not a species at risk or under review by COSSARO or COSEWIC.

Falconers are active conservationists and citizen-scientists. In recent years NAFA has partnered with the Ontario Hawking Club to fund goshawk nest location efforts in southern Ontario. Allowing a limited take by falconers will encourage more activities of this type and facilitate conservation of this widespread, but sometimes elusive, raptor.

In closing we would like to thank you for this opportunity to comment, and for developing a proposal that would significantly improve Ontario falconry and allow all falconers to fully participate in the cultural heritage and traditions of falconry — in a very sustainable way.

If there is any other information that we can provide in support of this proposal, please do not hesitate to contact us.

Sincerely,



Sheldon Nicolle, President
North American Falconers Association
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Cc: NAFA Board of Directors
Mr. Martin Geleynse, Vice President
Ms. Joan Marie, Corresponding Secretary
Mr. James Maynard, Esq., General Counsel

Millsap, B. A. and G. T. Allen. 2006. **Effects of Falconry Harvest on Wild Raptor Populations in the United States: Theoretical Considerations and Management Recommendations.** *Wildlife Society Bulletin* 34(5):1392-1400.

State of California, Dept. of Fish & Wildlife, 2013, **Final Environment Document Regarding Falconry Regulations**