



October 8, 2020

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

Dear Public Input Coordinator,

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

On behalf of Ontario Nature, the Ontario Field Ornithologists and the Ottawa Field Naturalists Club, we would like to express our strong opposition to the proposal to expand the capture of wild raptors for falconry in Ontario.

Ontario Nature is a charitable conservation organization that protects wild species and wild spaces across the province through conservation, education and public engagement. We represent over 30,000 individual members and supporters and over 150 member organizations. We are a member of the Provincial Falconry Advisory Committee.

With over 1,700 members, the Ontario Field Ornithologists (OFO) is *the* provincial organization dedicated to the study of birds in Ontario. OFO publishes the journal *Ontario Birds journal* and the newsletter *OFO News*, operates the provincial rare bird listserv *Ontbirds* and *Birdnews* message service, runs field trips and workshops across the province, and oversees the Ontario Bird Records Committee which adjudicates the official provincial bird checklist. OFO is one of the five partner organizations of the third Ontario Breeding Bird Atlas.

The Ottawa Field-Naturalists' Club, founded in 1863 and incorporated in 1879, is the oldest natural history club in Canada. Over 800 members participate in many aspects of the natural world, from birding to botanizing, investigation to publication, conservation to cooperation.

The Ministry of Natural Resources and Forestry (MNRF) is proposing to increase the take of raptors from the wild more than four-fold, without any formal risk assessment of the potential impact or any solid rationale for the increase. Currently, the total number of raptors that can be taken from the wild is 25 per year, based on a lottery system. The proposal is to allow all licensed falconers (approximately 200) and licensed apprentices (unspecified number in the ERO posting) to take one wild raptor per year. In addition, the proposal is to open up the take to include northern goshawks (up to five per year, based on a lottery system).

Our reasons for opposing this increased take of raptors from the wild are as follows:

1. *No justification of need:* The proposal fails to explain why the current limit of 25 wild raptors is not sufficient for Ontario's 200 falconers. The species that are currently allowed to be taken (red-tailed hawk, sharp-shinned hawk, merlin and Cooper's hawk) live between 8 and 20 years in the wild, depending on the species. The current limit is more than enough to ensure that falconers have wild birds at hand. Quadrupling the limit speaks more to greed than need.
2. *Lack of meaningful provincial oversight:* The proposal does not address provincial oversight and long-term monitoring of populations, a concern especially given the ministry's limited capacity for oversight and enforcement of the regulations.
3. *Northern goshawk is uncommon in Ontario:* Northern goshawks occur widely but sparsely in Ontario and are less abundant overall than the other species taken by falconers. Across Ontario, the probability of observing a northern goshawk dropped between the first (1985) and second (2005) Ontario Breeding Bird Atlases, with a significant decline of 54 percent in the northern shield. Allowing the capture of northern goshawks would be unwise until at least the results of the third Breeding Bird Atlas are known (in 2025), when we will have a better sense of raptor populations, including by region.
4. *No consideration of cumulative impacts:* Birds across North America are experiencing significant challenges due to a variety of human-induced threats including habitat loss, climate change, pesticide use and collisions with buildings and other structures. Increasing the take of raptors needs to be considered in light of these other threats to these species. For example, according to Audubon scientists, northern goshawk is predicted to lose up to 60 percent of its range across Ontario due to climate change: <https://www.audubon.org/field-guide/bird/northern-goshawk>.
5. *Highly questionable social benefit.* MNRF anticipates that there will be positive social benefits from the increased number of raptors taken from the wild. This claim is

unsubstantiated. Based on the number of members and supporters in our three organizations alone, for every falconer who supports the proposal, there are 150 who would be opposed. Given the fact that birding and birdwatching are increasingly popular pastimes, the actual difference is likely much greater. In other words, there will be a net negative social impact should the proposal go forward.

In closing, for the reasons outlined above, we strongly urge the MNRF not to proceed with this proposal.

Yours truly,



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