

August 23, 2021

Public Input Coordinator
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Sent via email to: wildlifepolicy@ontario.ca
and submitted online via the [Environmental Registry of Ontario \(ERO\)](#)

To Whom It May Concern:

Re: Environmental Registry # 019-3977: Financial penalty for failing to submit a mandatory hunter report

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to provide comments regarding ERO # 019-3977. OFA supports the Ministry of Northern Development, Mines, Natural Resources and Forestry's proposal to establish a financial penalty for hunters that fail to submit a mandatory hunting report.

From an agricultural perspective, wildlife can cause significant economic losses for Ontario farmers, causing significant crop, livestock and poultry damage and losses. OFA acknowledges the importance of hunters in the Ontario landscape. Hunting is an important management tool to control wildlife and is used as part of sustainable agricultural practices in Ontario.

Hunters that have purchased or have been issued a tag for certain species are required to complete a hunter report at the end of the species-specific hunting season. Information provided by hunters through mandatory hunter reporting helps to manage wildlife in Ontario by monitoring wildlife populations, tag quotas, and helps to determine the availability of additional tags, changes to seasons, bag limits, and inform management policies. OFA supports policies and programs

which are evidence-based and data-driven; Data derived from hunter reports promotes a sound wildlife management policy and decision-making framework.

To maintain and improve participation in mandatory reporting, OFA supports implementing a mandatory financial penalty for hunters who fail to submit a hunter report. A financial penalty will promote and improve hunter reporting compliance and improve reporting data that supports sustainable wildlife management. As we do not possess the necessary expertise or data to make an informed decision, OFA is unable to provide input on an appropriate penalty amount. However, OFA recommends the Ministry determine a penalty fee that provides the necessary incentive for hunters to submit reports and increase response rate but isn't too burdensome or creates a financial barrier to participation in hunting activities. OFA also supports maintaining a process to consider waiving penalties in limited, exceptional circumstances such as sudden injury, illness, or an error in the fish and wildlife licensing service.

OFA would like to reiterate that a significant number of Ontarians do not have suitable broadband access. Maintaining alternative reporting options, such as in-person and by telephone would help maintain and improve compliance with mandatory hunter reports.

OFA welcomes the opportunity to present our agricultural-based perspective on financial penalties when hunters fail to submit a mandatory hunter report. OFA believes that mandatory reporting supports responsible wildlife management in Ontario.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors