



**ONTARIO
RIVERS
ALLIANCE**

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Public Input Coordinator
Species Conservation Policy Branch
300 Water Street, Floor 5N
Peterborough, ON
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By email: WildlifePolicy@ontario.ca

Re: ERO 013-4124
Proposal to establish a hunting season for double-crested cormorants in Ontario

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, private and First Nation members who have come together to protect, conserve and restore Ontario riverine ecosystems.

ORA is writing to oppose the proposed listing of the double-crested cormorant as a game bird, and the creation of a hunting season for population management and related changes in Ontario.

This proposal represents a wholesale slaughter of the cormorant population, which is being blamed for destroying the “sport” fishery in Ontario. This is in spite of the first paragraph of the ERO posting, which states that “their numbers began to increase rapidly from the 1970s to the early 2000s, with the latest information indicating Great Lakes populations have since stabilized or declined slightly.”

The government points out that it is responding to “concerns expressed by some groups” as a result of the impacts of cormorants on fish populations; however, the Canadian Wildlife Service has clearly demonstrated that cormorants do not eat “sport” fish in any significant numbers. No explanation is given to why a stable or slightly declining population should be opened to a massive slaughter.

This disturbing proposal would allow the killing of 50 cormorants per day from March 15 until December 31 each year, which would potentially mean the killing of more than 14,000 birds per hunter, per killing season. Additionally, both members of a nesting pair are required for nesting success; therefore, the killing of either the male or female during the nesting season would result in their chicks starving to death. The government also proposes to amend the Fish and Wildlife Conservation Act to allow killed cormorants to be left to spoil, but suggests that if this proposal proceeds it may be accompanied by regulations to require retrieval and disposal of the



carcasses. This entire proposal is unacceptable, irresponsible and unjustified, and presents an increased risk to cottagers and recreational boaters and fishermen.

No scientific justification or data has been presented to support a drastic culling of this wild native cormorant population whose populations in the Great Lakes have been shown to be stable or slightly declining since the early 2000s. This proposal has offered no evidence-based rationale or information on the current population size or management target, and no plan or strategy to detail its potential impacts on the ecosystem. How will this killing season be monitored or assessed, and what about the collateral damage/risks to other bird and aquatic populations and, more importantly, to the public at large?

According to the [Canadian Wildlife Service](#), cormorants feed primarily on small, largely non-commercial, shallow-water fish (e.g., non-native rainbow smelt and alewife). Only a small percentage of their diet consists of “sport fish,” which is one of the reasons given for the hunt.

ORA objects to the proposed policy to establish a hunting season for double-crested cormorants when there is already provision under Section 31 of the Fish and Wildlife Conservation Act, to harass, capture or kill cormorants if they’re causing property damage.

The extreme bag limit allowing an individual to kill 50 cormorants a day for nine-and-a-half months of the year, including the breeding season, is without precedent and could cause significant harm to this and other native wildlife populations.

This proposal goes far beyond what any ethical hunters would consider reasonable and appropriate. It is difficult to believe that any environmental or sport game/fishing group would support such a proposal for a full-on slaughter of any wild native species.

ORA urges this government to abandon this ill-considered proposal when there is no reasoned or evidence-based data to support it. Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
(705) 866-1677

Cc: Minister John Yakabuski, Minister of Natural Resources & Forestry