



Wildlife Section
Public Input Coordinator
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough Ontario
K9J 8M5
Phone: (705) 755-1940

December 28, 2018

Ladies and Gentlemen,

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

Ontario Nature and the David Suzuki Foundation strongly oppose the proposal to establish a hunting season for double-crested cormorants in Ontario. According to the posting on the Environmental Registry, the Ministry of Natural Resources and Forestry (MNRF) is responding to “concerns expressed by some groups” (commercial fishing industry, property owners) about impacts of cormorants on fish populations, island forest habitats, other species and aesthetics. This so-called “population management tool” is lacking, however, in any scientific justification or evidence. The extreme bag limit allowing an individual to kill 50 birds 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 species.

Ontario Nature is a charitable conservation organization that protects wild species and wild spaces throughout Ontario. Established in 1931, we represent more than 155 member groups and over 30,000 individual members and supporters across the province.

The David Suzuki Foundation, through a combination of sound science and active public engagement, motivates Canadians to take action on the environmental challenges we collectively face. Since 1990, DSF has worked with communities, government, business and conservation allies to help people find solutions for living within the limits of nature.

For the reasons outlined below, our organizations urge the Government of Ontario to withdraw the ill-advised proposal to establish a hunting season for double-crested cormorants.

1. No science-based justification for the hunt.

Cormorant populations have rebounded from historic lows in the 1970s, after the species suffered steep declines because of exposure to environmental contaminants. Their recovery is considered a Great Lakes conservation success story. As recognized by MNRF, cormorant populations in the Great Lakes have stabilized or declined slightly since the early 2000s. This fact alone would suggest that the proposed hunt is unwarranted.

Further, this purported “population management tool” is lacking in any scientific justification or evidence. There is no information provided about the current cormorant population size, the population management target, the rationale for the high daily bag limit, or the plan to monitor and assess impacts. The proposal fails to consider the complex interactions of double-crested cormorants with other aquatic and terrestrial species, including fish populations.

Regarding the concern that cormorants are impacting fish populations, Professor Gail Fraser at York University notes that there are many factors that could impact the abundance of a fish population, including predation by humans, fish and other waterbirds, competition with other prey, water temperature and climate change. Consequently, in order to understand these relationships “rigorous scientific studies are required for each fish population consumed by cormorants.” (<http://gsfraser.blog.yorku.ca/research/conservation/proposed-cormorant-hunt-dec-2018/>).

Some studies indicate that cormorants can have a negative impact on local fisheries, such as yellow perch (Brian S. Dorr and David G. Fielder, <http://wildlife.org/the-rise-of-double-crested-cormorants-too-much-of-a-good-thing/#prettyPhoto>). According to the Canadian Wildlife Service, however, 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’ such as lake trout or salmon (Environment Canada, 1995, Fact Sheet: “The rise of the Double-crested Cormorant on the Great Lakes: WINNING THE WAR AGAINST CONTAMINANTS”). A study on the Niagara River showed that up to 85 percent of the cormorants’ diet during the breeding season consisted of the invasive, non-native round goby (Jeremy T. H. Coleman et al., 2012. “Eating the Invaders: The Prevalence of Round Goby (*Apollonia melanostomus*) in the Diet of Double-Crested Cormorants on the Niagara River,” *Waterbirds*). Professor Jim Quinn from McMaster University likewise confirms that studies he has been involved with show that cormorants are feeding mostly on problem fish such as non-native round goby and alewife (<https://www.thespec.com/news-story/9059210-nature-not-bullets-should-control-cormorants-mcmaster-biologist-says/>).

2. Inconsistency with standards and norms for wildlife management and hunting under the Fish and Wildlife Conservation Act.

The proposed hunt is inconsistent with basic standards of wildlife management and hunting. Notably, it would allow hunting to occur throughout the breeding season and at breeding colonies, likely leading to nest failure and chick starvation. Since both members of a cormorant pair are required for nest success, the killing of either parent would result in chick starvation.

The proposed hunt also includes a plan to amend the *Fish and Wildlife Conservation Act* which currently prohibits anyone who kills game wildlife from allowing the meat to spoil. The Ministry intends to add provisions so that hunters could allow cormorant carcasses to spoil. Permitting this wastage of a 'game' species would be unprecedented in Ontario. Though classifying cormorants as game is questionable in and of itself, since the bird is inedible.

3. Potential to cause significant harm to double-crested cormorants, a wild native species in Ontario.

We challenge the government's misleading claim that "the anticipated environmental consequences of the proposal are expected to be neutral." Anyone with a small game hunting license will be able to kill up to 50 birds a day, with no possession limit, from March 15 until December 31 each year. That's potentially more than 14,000 birds per hunter per season – essentially unlimited killing. As noted by Bird Studies Canada, "such a level of hunting would lead to local and/or regional extirpations, as well as reduction provincially to token remnant populations."

4. Potential to harm other wildlife species in Ontario

As noted by Professor Gail Fraser and by Bird Studies Canada, the proposed hunt poses a risk to other waterbirds, particularly those nesting with cormorants such as great blue herons, great egrets, black-crowned night-herons, Caspian terns, common terns and great black-backed gulls. Because the hunt is to be allowed throughout the breeding season and at breeding colonies, other nesting birds may be displaced or even killed.

The proposed hunt also endangers common loons, as they are difficult for many to distinguish from cormorants on the water.

5. Lack of enforcement capacity.

Given the scope of the hunt (nine-and-a-half month duration, high daily bag limit, no possession limit, permission to let carcasses rot) the enforcement capacity of MNR would need to be greatly expanded to enable monitoring and ensure effective enforcement of the law. Additional resources for monitoring and enhanced enforcement are unlikely to be available given the government's ongoing efforts to cut back on public expenditures.

6. Risk to public safety and enjoyment.

The government is proposing that hunters be able to shoot cormorants from stationary boats throughout the open water season – when boaters, cottagers and other outdoor recreationists are also out on the water. This poses a safety risk as the hunting season will overlap with the peak period of outdoor water-based recreation (spring and summer).

7. Property owners already have the power to address concerns about property damage.

Regarding concerns about property damage, the proposed hunt is unnecessary as property owners already have recourse, under section 31 of the Fish and Wildlife Conservation Act, to harass, capture or kill cormorants if they're causing property damage:

Protection of property

31 (1) If a person believes on reasonable grounds that wildlife is damaging or is about to damage the person's property, the person may, on the person's land,

(a) harass the wildlife for the purpose of deterring it from damaging the person's property;

or

(b) capture or kill the wildlife. 1997, c. 41, s. 31 (1).

In closing, we agree with the assessment of Birds Studies Canada that "the proposed bag limit of 50 Double-crested Cormorants per day per hunter with no possession limit over a nine and a half month open season is exceptionally high, unsustainable, and without precedent under the Fish and Wildlife Conservation Act for its failure to address the need for population sustainability."

We urge you to abandon the proposed hunt.

Yours truly,



Dr. Anne Bell
Director of Conservation and Education



Rachel Plotkin
Ontario Science Project Manager
The David Suzuki Foundation