



November 17, 2016

Wildlife Section
PUBLIC INPUT COORDINATOR
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
Wildlife Section
300 Water Street
Peterborough Ontario K9J 3C7

Re: *Wildlife Management Strategy Discussion Paper (EBR No. 012-8249)*

Dear Public Input Coordinator,

Thank you for the opportunity to provide comments to the Ontario Ministry of Natural Resources and Forestry (MNR) on the discussion paper, *Building a Wildlife Management Strategy for Ontario*. We are submitting this letter in our respective capacities as Wildlife Conservation Society (WCS) Canada scientists specializing in wildlife ecology, landscape ecology, conservation biology, and cumulative impacts. A national organization, our research and conservation priorities in Ontario are largely focused on the Far North, endangered species policy and legislation, and environmental assessment.

It is difficult to see the value of this discussion paper, beyond introducing a change in Wildlife Landscape Zones that will be used to scale up certain decisions related to wildlife management (as far as we can tell). It would have been simpler and preferable (as well as cost-saving) if MNR had issued only that component, with some more details, for public comment in a discussion paper on its own. Otherwise, this paper is heavy on generic content related to the history of wildlife management and threats and “emerging trends”, with several pages devoted to lists and limited descriptions of laws that “govern the protection, management, and use of Ontario’s wildlife populations and habitat”. Any semblance of content related to a strategy begins only on p. 21 of a 34-page document, but is limited to a few pages of goals and principles.

In addition, having a Wildlife Strategy in its own silo that limits its scope to a non-fish species in Ontario that are either used or in conflict with humans (“managed”) perpetuates an artificial distinction between wildlife and biodiversity that is no longer relevant in the 21st century. MNR’s mandate is to protect biodiversity, and even the *Fish and Wildlife Act (1997)* has a broader definition of “wildlife” (including “specially protected species”, mentioned only once) than this discussion paper allows. Although it is necessary to have legislation in place that governs hunting and fishing regulations, there is no need for a “strategy” to be similarly limited, and in fact an overarching biodiversity strategy is already in place and is the more appropriate

framework to bring together managed wildlife, species at risk, and other components of biodiversity together under one coordinated document. The artificiality of the limited scope of this discussion paper is illustrated, at least in part by the time takes to spell out the “drivers”, which are true for all biodiversity in this province, and the known fact that many wildlife species in the province are in decline and/or at risk of extinction. After all, the indicators of success in the MNRF *Horizons 2020* document include 1) Condition of Ontario’s species and 2) Ontario’s ecosystems function within their range of natural variation.

It is for these key reasons that we recommend strongly that MNRF abandon the notion of a formulating a “wildlife management strategy” for the province, and focus its energies and precious resources instead on implementing the Ontario Biodiversity Strategy. In keeping with its role as a member of the Ontario Biodiversity Council that developed this strategy, it would be great to see MNRF demonstrate leadership by making proper investments to better ensure its success and Ontario’s own stated commitments to biodiversity conservation. Wildlife could then be appropriately integrated as a key element of biodiversity, as it is already in MNRF’s plan *Biodiversity: It’s in Our Nature*.

In addition to this one principal recommendation, we have the following comments regarding the content of this discussion paper:

Wildlife landscape zones. We have nothing against the suggestion to add another broader-scale management unit, although we note that this discussion paper does not contain sufficient detail to enable scientific review of the Ministry’s proposed approach. Judging from the information that is provided, we have three concerns:

- 1) The discussion paper does not explain very well how these new units will be used in decision making, and how this scheme will improve administrative efficiency, given that it adds to the existing management unit scheme. The paper offers no indication of how decision-making processes will evolve once these boundaries are established.
- 2) We feel strongly that the zonation must include a species at risk/biodiversity lens. Given the unclear distinction between wildlife and biodiversity (e.g., when wildlife becomes a species at risk), it is increasingly clear that species at risk accumulate in areas where they share a common suite of threats and habitats. Zonation that is informed by such patterns would support the creation of integrated multi-species recovery/management strategies and implementation actions.
- 3) Although the paper makes much of the importance of establishing ecologically-based boundaries, it offers no explanation why Wildlife Landscape Zones in the Far North do not follow eco-regional boundaries. They seem to mimic Ontario’s Fisheries Management Zones which are not based on ecological boundaries.

Status of wildlife and effectiveness of policies. The discussion paper provides no analysis of the state of Ontario’s wildlife populations that would provide appropriate context to sections 3, 4 and even 5. It falls back in section 3 on lists of policies that have been created over the years, with no introspection about their respective roles or effectiveness to date. It would seem from

this (and our experience) that the province really has minimal understanding of what is working or not. No connections are made between the issues and trends described in section 4 and the laws and policies listed in the previous section. Some references to policies or laws are self-congratulatory when there is little evidence to support this, such as the *Endangered Species Act* 2007 (ESA) “making Ontario a North American leader in protecting species at risk and their habitat”¹. Some statements made about existing policies are wrong, e.g., that the *Crown Forest Sustainability Act* provides habitat for caribou, given the forestry exemption under the ESA that has been in place since the passage of that Act. Before developing any “strategy”, MNRF should conduct a critical review of how these policies have delivered on the MNRF’s indicator of success, specifically the condition of Ontario’s species and Ontario’s ecosystems function within their range of natural variation as described in Goal 2 of the MNRF’s *Horizons 2020* strategic vision.

Monitoring. Monitoring is critical for adaptive management and managing and mitigating risks associated with development, climate change, and other shifting circumstances. Although both are enshrined in the 6 principles, the need for monitoring is barely mentioned. Although MNRF recognizes monitoring is important to “support the best decision making” under Goal 2 of healthy ecosystems in *Horizons 2020*, “Monitoring” is missing from the diagram in Figure 2 of this discussion paper, and there is no mention of monitoring in the 6 Principles. We know the MNRF has reduced its investment and efforts over the last decade or so in tracking the condition of most wildlife, species at risk, or biodiversity in general, and that this has had consequences. For example, in spite of the significant resources the province has spent over the years in managing black bear conflict, it has not devoted sufficient dollars to evaluating the success of its management policies, leaving it in a hopeless position to defend claims that bear populations have escalated. This has led to an expensive, conflict-ridden and reactive shifting of policies over almost 20 years that is fundamentally uninformed and in violation of Goal 3 of this discussion paper. Similarly, lack of investment in boreal caribou population monitoring for the past 5 years renders the province practically mute in the heated discussions in northern Ontario around conflicts between forestry and caribou recovery.

“Ecosystem/Landscape Approach”. We have seen many references to this approach in the context of the Ministry’s transformation over the past four years. The main question that keeps coming up for us relates to how this “approach” translates into integrated decision making at relevant scales, let alone increased effectiveness (and efficiency). Effective management of natural resources in Ontario in this age of cumulative impacts will require deliberate coordination within the Ministry (e.g., across districts, regions and programs), and between Ministries.

Public trust and governance. It is important to stress to the Minister that wildlife conservation is losing ground in North America, for many reasons that are acknowledged in the discussion

¹ The most recent report of the Environment Commissioner of Ontario -- *Small Steps Forward Environmental Protection Report 2015/2016*-- once again challenges such a notion.

paper through mention (albeit superficial) of a host of drivers, albeit with no connection to the condition of species that are the focus of the paper. Key indicators of wildlife management concern in Ontario include: 1) increasing numbers of listed species at risk, 2) overabundance of many human-subsidized species, 3) habitat protection being outpaced by conversion (e.g., wetlands) and fragmentation, 4) increasing number of invasive species, and 5) increasing disconnection between people, especially children, and nature. All this has bearing on how the province manages wildlife and engages the public trust. To quote from a recent paper of Daniel Decker (a professor at Cornell University) and colleagues regarding the necessity of public engagement “To address this trend, the wildlife conservation institution (i.e., all customs, practices, organizations and agencies, policies, and laws with respect to wildlife) must adapt to contemporary social–ecological conditions.”² This will involve far more than simply adjusting the management units, and we think it requires a fundamental shift in governance that considers a large and growing array of social values around wildlife, land use, and ecological change. There is no indication in this discussion paper that the MNRF has any notion of what it might actually take to truly modernize in this regard. We also suspect this discussion paper enables MNRF to frame its reliance on others (e.g., NGOs, Conservation Authorities, citizen groups) to actually deliver management and conservation outcomes in Ontario.

We urge you to consider our recommendation to refocus the Ministry’s efforts and resources on implementation of the Biodiversity Strategy, placing management of wildlife that are the subject of this discussion paper in its proper context. Success will require an honest analysis of the effectiveness of existing policies and commitment to integrated and coordinated decision making, including with other Ministries.

We would be happy to discuss these comments further. Please feel free to contact us if you have any follow-up questions or comments.

Sincerely,



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² Decker, D. et al. 2016. Governance principles for wildlife conservation in the 21st century. *Conservation Letters* 9: 290–295.