



Zoocheck Inc.

788 ½ O'Connor Dr.
Toronto, Ontario
M4B 2S6

Ph: 416.285.1744
Toll Free: 1-888-801-3222
rob@zoocheck.com
www.zoocheck.com

Wildlife Section
Public Input Coordinator
Ministry of Natural Resources and Forestry
Policy Division, Species Conservation Policy
Branch 300 Water Street
Peterborough
Ontario K9J 8M5

January 2, 2019

To Public Input Coordinator:

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

On behalf of Zoocheck's many thousands of members, supporters and constituents across the province, I would like to express our strong opposition to the proposal to establish a hunting season for double-crested cormorants in Ontario.

According to the Environmental Registry, the Ministry of Natural Resources and Forestry (MNRF) is responding to "concerns expressed by some groups" about impacts of cormorants on sport fish populations, island and headland forest habitats, other colonial waterbird species and aesthetics. We have many concerns about the MNRF proposal including the fact that no scientific evidence has been provided to substantiate, either wholly or partially, the "concerns expressed by some groups."

We are especially concerned that no information has been provided about the current cormorant population size in Ontario, the government's proposed population target number, the reason for the 50 bird daily bag limit, and how hunting can be monitored and controlled given the lack of resource capacity in the MNRF. The proposal also seems to ignore the fact that double-crested cormorants are a native Ontario waterbird species that, because of its biology and behaviour, is conspicuous and vulnerable to harassment and hunting.



The proposal also fails entirely to consider the complex interactions of double-crested cormorants with other colonial waterbirds, fish populations, and both aquatic and terrestrial habitats and we are alarmed that there is no analysis whatsoever of the ecological benefits cormorants bring to the habitats in which they live.

The entire proposal appears to be rooted in myths, misconceptions, innuendo and false assumptions about double-crested cormorants in Ontario. As such, it is heavy handed, unnecessary and will almost assuredly result in irreparable harm to cormorants in Ontario, to other colonial waterbirds that benefit from the presence of cormorants, to other waterbirds that are similar in appearance to cormorants and to the aquatic and terrestrial environments in which cormorants and other colonial waterbirds live.

It should be noted that recent evidence shows that the double-crested cormorant population in Ontario is stable and decreasing in some regions. On the United States side of the border, cormorant numbers have already naturally decreased by 30% or more. There is nothing to suggest that the Ontario situation is different and there is nothing supporting the claim that the number of cormorants currently in the province is excessive.

Should the proposed hunting season be implemented, given the number of small game hunting licenses issued annually in Ontario, along with the daily bag limit of 50 cormorants per day for the entire season, the provincial limit for cormorants legally able to be killed would be approximately 2.7 billion birds. For a cormorant population that probably numbers between 125,000 – 200,000 birds in the province, most of them existing in highly conspicuous situations, the proposed hunting season could very easily force cormorants back to a position of endangerment or worse.

Finally, we would like to note our additional concern regarding public safety. The proposed hunting season includes those times of year when recreational open water usage, for boating and other activities, is at its highest. Since hunters targeting cormorants will be allowed to shoot from stationary boats throughout these high-use times, the potential risk to human safety is substantive, as is the possibility of conflict with recreational open water users.

We strongly urge you to abandon the proposed double-crested cormorant hunt. It is unethical, unscientific, unnecessary, unsafe and cruel.

Sincerely,



Rob Laidlaw
CBiol MRSB, Director