



# ATLANTIC FLYWAY COUNCIL

Ontario	Québec	Nunavut	New Brunswick	Newfoundland & Labrador	Nova Scotia	Prince Edward Island
Maine	New Hampshire	Vermont	Massachusetts	Rhode Island	Connecticut	New York
Pennsylvania	New Jersey	Delaware	Maryland	Virginia	West Virginia	North Carolina
South Carolina	Georgia	Florida	Puerto Rico	Virgin Islands		

January 3, 2019

Wildlife Section  
 PUBLIC INPUT COORDINATOR  
 Ministry of Natural Resources and Forestry  
 Policy Division  
 Species Conservation Policy Branch  
 300 Water Street  
 Peterborough Ontario  
 K9J 8M5

Dear Public Input Coordinator:

We thank the Ontario Ministry of Natural Resources (OMNR) for requesting comments on the proposed action to establish a hunting season on Double-crested Cormorants. The Atlantic Flyway Council is a coalition of 17 states, Puerto Rico, 1 territory, and 6 Canadian provinces that works in conjunction with the respective federal governments to manage migratory birds and their habitats in eastern North America. Atlantic Flyway Council states and provinces, cooperating with various federal agencies and non-governmental partners, deliver many of the conservation programs for migratory birds in a significant portion of the eastern seaboard of North America.

The Atlantic Flyway Council expresses its deep concern regarding the proposal to establish a hunting season for the Double-crested Cormorant in Ontario through an amendment to the Fish and Wildlife Conservation Act and supporting regulations.

The Double-crested Cormorant is native to Ontario, but is also a shared migratory resource with the other Treaty signatories of the Migratory Bird Treaty Act. Agencies in the United States also have increasing management issues with Double-crested Cormorants and their impacts on the flora and fauna in certain areas. We have addressed and continue to address these issues through Depredation Permits and Orders. Control of ecological, economical, and general nuisance issues with this species are not, in the opinion of the member states of the Atlantic Flyway, best solved through initiating a hunting season

Double-crested Cormorants suffered from environmental contaminants (notably, persistent organochlorine contaminants) in the Great Lakes region, which led to depressed population levels. Since the removal of many of these toxins into the environment, the population has recovered rapidly in recent decades. While the population has increased significantly in recent decades, OMNR indicates that the population is now stable or declining – a common pattern of growth and stabilization in natural populations – which suggests this proposal to actively and

widely reduce the species' population by hunting or other management action, may not be warranted at the scale proposed.

The Atlantic Flyway Council has a number of specific concerns with the proposed action, as outlined below, including: (1) lack of scientific credibility and justification for the proposed action; (2) deviance from all tenets of the long standing ethic and purpose of hunting; and (3) unknown impacts on Double-crested Cormorant populations, and other native biodiversity and ecosystems;

(1) Lack of scientific credibility and justification

- The proposal fails to demonstrate a sound scientific basis for the need for population reduction through hunting. There is a lack of any detailed information about the species' current population size. Although there is a proposed program to monitor cormorant population and trends in Ontario, it would be some years before any such program could provide solid estimates, leaving the first few years essentially unmonitored.
- There is no quantification of current impacts to habitat, fisheries, or other species by Double-crested Cormorants that would support wide-scale population reduction through hunting. It appears that there are only "concerns" that have been voiced by certain groups.
- The proposal's policy rationale indicates that the species' population is stable or declining, which would seem to decrease OMNR's justification for population reduction through hunting.
- There is no mention of a target population goal for Double-crested Cormorants that would result from the proposed management action. What is the quantifiable objective?
- The proposal fails to address the potential impact of the "hunt" on the population of Double-crested Cormorants in Ontario, or the potential impact on other wildlife species that could be affected. The length of the proposed "hunt" spans the nesting season of all other waterbirds, colonial nesters, and waterfowl. There is no mention of the potential effects of this hunt on the nesting and brood-rearing of these species.
- The proposal fails to adopt an ecosystem-based approach to wildlife population assessments and management, a key consideration for a species with such complex interactions with aquatic and terrestrial species and habitats. The proposal fails to describe a population management objective (population target), provincially or regionally. It also fails to define a timeframe over which the proposed action would occur.

(2) Deviance from all tenets of the long-standing ethic and purpose of regulated hunting

- The proposed hunt is inconsistent with every tenet of wildlife management and hunting ethics associated with The North American Model of Wildlife Conservation, including failure to protect wildlife during the breeding season, and the allowance of wanton waste.
- To call the proposed actions 'hunting' will cast a very poor portrayal of hunting. Migratory bird hunters have been and continue to be leaders of conservation. The proposed action would potentially tarnish their image and sport hunting in general.

- The proposed exemption to the requirement to protect against meat spoilage, coupled with a failure to retrieve or even report carcasses, renders population monitoring and enforcement effectively impossible. As previously stated, these actions are contrary to all established hunting ethic.
- The hunting of Double-crested Cormorants during the breeding season is, as stated previously, inconsistent with wildlife management and hunting principles and ethics; such hunting will inevitably lead to failure of nests and starvation of chicks, which are issues of concern relating to both population management and to humane treatment of wildlife.
- The proposed open season from March 15 to December 31 each year represents the entire duration of the species' natural annual occurrence in Ontario – effectively resulting in no meaningful closed season in the Province.

(3) Unknown impacts on Double-crested Cormorant populations and other ecosystem components

- The proposed bag limit of 50 Double-crested Cormorants per day per hunter with no possession limit over a nine and one-half-month-long open season is exceptionally high, unsustainable, and without precedent under the Fish and Wildlife Conservation Act. This proposal is notable for its failure to address the need for population sustainability. The likelihood that this proposal would have only a 'neutral' impact is not justified.
- The proposal allows for shooting of Double-crested Cormorants on breeding colonies, which could lead to mortality of other colonial waterbird species that often nest in close association with Double-crested Cormorants, such as Great Blue Herons, Great Egrets, and Black-crowned Night-Herons.
- Disturbance by hunters will disrupt other wildlife nesting in and near Double-crested Cormorant colonies, including the above-noted heron family members, as well as other species such as Caspian Terns, Common Terns, and Great Black-backed Gulls.

We thank OMNR for the opportunity to comment on the proposed action and hope that the OMNR will reconsider this proposal and work to develop a science-based and more collaborative solution to addressing real and perceived issues caused by Double-crested Cormorants.

Sincerely,



Rob Hessler  
 Chair, Atlantic Flyway Council