

OFO's Response to ERO 019-1806: Proposal to expand the live capture of wild raptors (birds of prey) by licensed falconers

OFO is opposed to the proposal as currently described to expand the capture of wild raptors for falconry in Ontario. We are not opposed to the practice of falconry or use of raptors as working birders to manage birds at airports; however this proposal risks harm to wild bird populations without providing sufficient rationale for the necessity of expanding the live capture of wild raptors in Ontario.

OFO is also a signatory to Ontario Nature's letter of October 8th and endorses the position of the Niagara Peninsula Hawkwatch submission which thoroughly outlines the current declines in most wild raptor populations in Ontario.

With over 1,700 members, the **Ontario Field Ornithologists** (OFO) is the provincial organization dedicated to the study of birds in Ontario. OFO publishes the journal Ontario Birds journal and the newsletter OFO News, operates the provincial rare bird listserv Ontbirds and Birdnews message service, runs field trips and workshops across the province, and oversees the OBRC which adjudicates the official provincial bird checklist. OFO is one of the five partner organizations of the third Ontario Breeding Bird Atlas. For more information, visit: www.ofo.ca.

The Ministry of Natural Resources and Forestry (MNRF) is proposing to increase the capture of raptors from the wild by at least four times the current limit of 25 per year. Moreover, the proposal adds Goshawks to the capture list with a limit of five per year.

OFO is opposed this proposal for the following reasons.

1. While OFO supports the practice of falconry and use of raptors as working birds, there is no justification proposed for the need to increase wild capture to support these activities. Why is such a large increase – from 25 birds per year to 200+ justified?
2. The proposal states that the population of species allowed for capture: Red-tailed Hawk, Cooper's Hawk, Sharp-shinned Hawk and Merlin are abundant and secure populations. There is no evidence presented for this assertion. In fact, current observations from hawkwatch sites indicates that most raptor species are experiencing a steady decline in numbers. OFO recommends waiting for the results of the third Ontario Breeding Bird Atlas in 2025 to determine if the increase in taking wild raptors can be accomplished without damaging wild populations overall and in specific regions.
3. The proposal does not explain how impacts on wild populations are assessed or how the capture will be monitored.
4. The proposal states that Northern Goshawk populations are stable without providing any basis for this assertion. The first two Ontario Breeding Bird Atlases documented population declines for this species. OFO cannot support adding Northern Goshawks to the allowed capture list unless the results of the third Ontario Breeding Bird Atlas indicate that the population is stable.

5. The social benefit for this proposal is not justified. As stated above, OFO supports the practice of falconry, but there is no justification provided for the need to increase the capture of wild birds or how falconry in Ontario will suffer if the take remains as it is currently at least until populations can be assessed with information from the third atlas.

In closing, for the reasons outlined above, we strongly urge the MNRF not to proceed with this proposal.

Lynne Freeman, President
OFO Board of Directors