



Ontario Field Ornithologists

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Ministry of Natural Resources and Forestry

EBR Registry Number 013-4124

<https://ero.ontario.ca/notice/013-4124>

Ontario Field Ornithologists (OFO) Response to ERO 013-4124

The Ontario Field Ornithologists (OFO) is an organization dedicated to the study of birdlife in Ontario. Formed over thirty years ago, OFO's 1,200 members include people from all regions of Ontario and all walks of life including scientists, environmental consultants, wildlife biologists and general bird watchers.

OFO is opposed to the proposed hunting legislation for the Double-crested Cormorant. While OFO acknowledges that many people do not like cormorants or their colonies, aesthetic preference in no way justifies a hunt. The proposal ignores much of the scientific evidence regarding cormorants, puts protected bird species at risk and dismisses proven, non-lethal methods of managing cormorant populations.

Apart from the impact on cormorants and other bird species, the legislation potentially puts others who share the waterways during the proposed hunting season at risk. Shooting from boats during the summer months: June, July and August, is not compatible with recreational uses of our lakes and rivers.

Reasons Why OFO is Opposed to the Cormorant Hunting Proposal

1) Killing Cormorants During Breeding Season

With a hunting season extending from 15 March to 31 December, the bill would allow hunting precisely during the regular breeding season of cormorants, approximately April - July. This would include the time when cormorants have young in the nest and when those young are totally dependent upon constant care from their parents. The young of adult cormorants, who would be shot, would die from exposure and/or starvation. No other "game" bird is hunted during its breeding season or on its breeding colonies or while tending its nests.

2) Risk to Protected Bird Species

Cormorants seldom nest alone, by themselves, in single species colonies. In Ontario, they almost always nest with one or more of the following groups of colonial water birds: gulls, terns herons, egrets and pelicans. These species are protected by federal migratory bird legislation or provincial legislation.

Discharging shotguns at or near cormorant nesting colonies, including shooting at flying birds and shooting adults on their nests – both in trees and on the ground, would be an enormous disturbance to all of these co-habiting species. It is almost a certainty that these protected species will be accidentally



killed or will abandon their nests due to disturbance or associate incidental predation and consequently their young would also die. Thus, shooting cormorants on their nesting colony and causing disturbance (or injury or death) to other nearby or interspersed nesting colonial water birds (which would be inevitable) would be a violation of the Migratory Bird Convention Act. This would put provincially licensed cormorant hunters at risk of legal prosecution on violation of federal migratory bird statutes.

3) Public hunting is not the appropriate method for Managing Ontario's Double-crested Cormorant Population

Since cormorants are virtually inedible, the only possible rationale for a cormorant hunt is to attempt to reduce their populations. The evidence is mixed on whether cormorants have a significant effect on sport fish populations.

There is strong evidence that Ontario's cormorant population has stabilized and has even declined in some areas of Ontario (Lakes Huron and Superior) due to regime shifts in their food supply. There is no need to shoot cormorants to stabilize or reduce their population. Population reduction can be achieved through less intrusive methods than shooting, e.g. egg-oiling.

4) Shooting is Not Required to Manage Cormorant Colonies

If management is deemed necessary to restrict colony expansion at specific sites and limit further damage to trees, less intrusive/non-intrusive methods have proven extremely effective and do not harm protected species nesting in, or adjacent to colonies.

Methods which do not require killing hatched birds include: human presence during nest site selection and post-breeding dispersal, egg oiling, provision of ground nesting materials and destroying nests prior to egg-laying. Egg oiling is a very effective means to limit cormorant productivity and has already been used to great success on some ground-nesting cormorant colonies on the Great Lakes.

5) Daily Bag Limit is Unenforceable

The proposed daily bag limit of 50 birds with no possession limit is essentially unenforceable. At the end of a full week, a determined hunter could legally shoot 350 cormorants. What is less certain is how many would be retrieved due to the location of hunting (some might fall into crotches of tree or tangled vegetation) or because of their weight, or because of shooting on open water (some might be lost underwater, etc.). Unretrieved birds would jeopardize a hunter's claim to have stayed within the daily limit, if confronted by a conservation officer requiring proof.

6) Social Impacts

OFO notes that there is a suite of negative social impacts to the proposed legislation. Among these are:

- Loss of confidence in the Ontario government's support for environmental protection, ecosystem management and conservation principles



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- Exacerbation of strife and conflict between hunters and non-hunters
- The mis-conception of this as a "hunting season", which it is not. Classifying cormorants as "game" under the FWCA does not make this proposed activity hunting. Hunting involves eating what is procured.
- Human safety (e.g., shooting from boats, shooting with shotguns over open water, shooting near areas where recreation is occurring during the highest water-based recreation time in the calendar year). This invites conflict with the non-hunting recreational public.

In conclusion, OFO urges the Ontario Government to withdraw the proposal. If a cormorant management strategy is required, it should be founded on strong science and should not impact protected species. Apart from any other consideration, the danger to others, who also use the waterways, should be of foremost concern.

Ontario Field Ornithologists (OFO)

Lynne Freeman
President