



**Strategy for Preventing and Managing
Human-Wildlife Conflicts
in Ontario
(EBR PB06E6017)**

OR



**Strategy for Preventing and Managing
Human-Deer Conflicts
in
Southern Ontario
(EBR PB06E6018)**

Priority: URGENT

BY FAX

Date: November 12, 2006

To: Ministry of natural Resources,
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From: Greg Lapienes and Paul Harris,
Spokespersons
Volunteer Wildlife Custodians (VWC)

Re: Response to Draft EBR Registry Number PB06E6017 & PB06E6018

Copy: Members, VWC

POSITION STATEMENT:

As a group which includes former wildlife custodians and foster parents, concerned residents, and supporters of humane wildlife legislation and regulations, we favour a strategy that focuses on preventative techniques to humanely and effectively manage human-wildlife conflict. The document entitled "**Living With Wildlife**" **Toward An**

Ontario Strategy To Manage Human-Wildlife Conflicts, which was the supporting basis for the data, strategy, goals, objectives, and recommendations contained in these EBRs, reflects effective political lobbying by farmers in Ontario, particularly southeastern Ontario. Even granting that such a conflict exists, a point we do not concede, the incomplete information contained in the EBR, along with distorted statistics, and misrepresentation of available information shows a complete lack of regard for and a disinterest in dealing with the root causes of this alleged conflict. Certainly, the EBRs dismiss or ignore multiple viable solutions to address this ‘conflict’.

The recommended actions and the implementation strategy calls for and strongly encourages an aggressive harvesting approach while there is little regard for pursuing positive preventative action.

Despite involving “*several provincial Ministries and a diverse group of interested stakeholders*”, the approach to managing human-deer and all human-wildlife conflicts supports and focuses solely on the demands of the farmers and hunters to escalate harvesting. The EBRs present this approach as a desirable panacea to resolve the conflict while downplaying and minimizing more effective and proven methods. This, along with incomplete and misrepresented information, is discussed below to challenge the Ministry’s recommended strategy and action. The EBR sections challenged are either quoted or paraphrased and can be identified by the use of *italics*.

NOTE: Since there are two EBRs, tied by similar goals, we will address both. Where we say ‘Human-Wildlife’, we are referring to your document *Strategy for Prevention and Managing Human-Wildlife Conflicts in Ontario*. Where we say ‘Human-Deer’, we are referring to *Strategy for Prevention and Managing Human-Deer Conflicts in Southern Ontario*.

OVERVIEW

In reviewing a wealth of published information pertaining to the three areas of concern noted in the EBRs ...

Economic: crop damage, vehicle collisions and abatement and mitigation of expenses

Ecological: intensive foraging in natural areas that affects forest regeneration, and species at risk and other biodiversity objectives, and finally,

Social: public safety risks from vehicle collisions, potential health concerns associated with deer diseases, damage to gardens and landscape vegetation in the urban environment

... we will show that: many effective options exist; the statements noted above are designed to create fear-mongering strategies by implying there is a greater risk here than in other occurrences of daily living; the triteness and pettiness of some of the Ministry’s positions.

3.0 GUIDING PRINCIPLES (per Human-Wildlife and Human-Deer)

Of the ten principles listed in the EBRs, three are particularly noteworthy:

Effectiveness of prevention and management strategies is dependent on implementation of a variety of practical solutions through collaboration and discussion of stakeholders,

Effective outreach and education are important for minimizing human-wildlife conflict, and

Prevention is achieved through proactive effort and an adaptive management approach.

First, it is evident that the catalyst behind these EBRs is the agricultural lobby in southeastern Ontario. They have identified a ‘crisis’ which the MNR implies can be easily remedied with the involvement of hunters. Naturally, hunters would applaud the increased availability of hunting tags, expansion of the harvest to include does, and encouragement of rural owners to welcome the hunt on their property.

However, despite a comprehensive array of literature available from reliable and reputable sources to educate the urban and rural public on the tools, techniques, strategies and equipment that even the Ministry and associated Ministries have referenced in their written discussions around this conflict, the EBRs ignore all of these tools and this expertise in favour of a ‘kill the victim’ approach. For surely the encroachment of agricultural and urban life on wilderness areas is the root of this problem, with the displaced wildlife being the real victims — not the farmers who could readily protect their crops, not the hunters who might wither away without the opportunity to go out and shoot things.

The information referenced elsewhere by the MNR and other Ministries ranges from simple to complex, with costs varying from nothing to more expensive. In proportion to the overall cost of farming, prevention would go a long way. Yet as we see in this document the MNR does not promote even a basic educational tool kit. Much of the urban, rural, and safety issues would not arise if a proactive approach was already in place.

Potential solutions have been underscored by the primary focus on harvesting, a particularly distasteful euphemism. The EBRs present a clear message: the only acceptable concrete action is:

- (a) *increase harvest quota*
- (b) *encourage harvesting*
- (c) *expand the profile of harvester and geographical areas*

To be fair, the EBRs do suggest “*evaluating and refining the effectiveness of harvest management as a tool to influence changes in deer populations relative to other variables.*” Unfortunately, the wildlife will be dead at that point and if it turns out not to have been the proper solution, there is little the MNR can do to correct its blunder.

In an effort to cover up the real intent of this EBR, it is full of ‘feel-good’ but meaningless terminology like ‘education, literature review, public service advertisements, community-based stewardship’. But it is clear the MNR looked at one solution only: the killing of wildlife, the instant gratification that provides for farmers and hunters, and not jeopardize the revenue it generates for the MNR.

4.0 GOALS AND OBJECTIVES (per Human-Wildlife and Human-Deer)

The goal and objectives of the strategy are little more than motherhood statements.

What is meant by ‘collective and effective action,’ or ‘dedicated support’ and who are the ‘stakeholders’? The consultation process for “**Living With Wildlife” Toward An Ontario Strategy To Manage Human–Wildlife Conflicts** omitted the majority of pro-wildlife organizations, such as the Ontario Wildlife Coalition, Animal Alliance, Earthroots and Peaceful Parks, among others. The outcome of the consultative process was clearly manipulated to support the Ministry’s intent to placate a very powerful lobbying group in southeastern Ontario, and to sell tickets to kill wildlife.

INTEGRATED SOLUTIONS FRAMEWORK (per Human-Wildlife) and **STRATEGIES** (per Human-Deer)

The majority of the strategies noted and the section summation are vague and easily manipulated to support biased outcomes. Rephrasing in plain English rather than in dubious abstracts would force accountability, transparency, and consistency in approach and implementation.

To address some of the specific strategies outlined in the EBR — and the word ‘specific’ is used guardedly here since there are few specifics given:

Objective 1 - Strategy 2 (re: Human-Deer)

Define the issues and establish solutions at the appropriate geographical scale

It has already been identified that this refers to southeastern Ontario. It shouldn’t have been so hard to say so.

Objective 2: To develop and implement a prevention program that incorporates effective tools, coordinated delivery and the achievement of timely results? (re: Human-Deer)

So what does this mean? According to the MNR’s Deb Stetson, this EBR was anticipated by February 2006. And it was to be brought back to a focus group which included VWC. Neither of those things happened. Is this what the MNR considers to be the achievement of ‘timely results’?

Neither of those things happened. Is that what the MNR considers to be the achievement of 'timely results'?

There are three general approaches to address conflicts between humans and deer:

- *modify the factors that created the problem;*
- *increase public tolerance so the conflict is reduced or eliminated; and*
- *alter deer population densities.*

Conflict is only attributed as such when it is driven by a complaint, and the more powerful the complainer, the more attention it will be given. To modify the factors that created the problem would essentially mean the reforestation of land, the prevention of further deforestation by prohibiting approval of requests for 'Possible Land Use Change' – an all-too-prevalent sign in and around London, Middlesex County, and the encatchment counties.

Deforestation for commercial development and residential expansion has eroded the habitat and food source for wildlife, including deer. What responsibility will the Ministry take for this problem since it is one created by humans. Will it speak out to stop the spread of urban sprawl? Economically, that may not be viable, so you propose short-term and short-sighted solutions.

Hunting is the most commonly employed tool to manage deer abundance.

While it may be common, two questions must be asked: is it effective; and, what is the definition of deer abundance?

According to the information supplied by the Humane Society of the United States in *Hunting: Learn the Facts About Hunting*, hunting to prevent wildlife overpopulation is not effective.

"Wildlife to a large degree will naturally regulate its own populations if permitted, eliminating any need for hunting as a means of population control. (Hunters) often claim that hunting is necessary to control deer populations. Heavily hunted states like Pennsylvania and Ohio ... are among those experiencing higher deer densities than perhaps ever before. **When an area's deer population is reduced by hunting, the remaining animals respond by having more young, which survive because the competition for food and habitat is reduced.** Since one buck can impregnate many does, policies which permit the killing of bucks contribute to high deer populations. If population control were the primary purpose for conducting deer hunts, hunters would **only** be permitted to kill does. This is not the case because hunters demand that they be allowed to kill bucks for their antlers."

So how will the expansion of the harvest significantly control this population. The EBRs state that scientific and empirically proven data will be key in analyzing the results of the strategies employed. Is there really a need to reinvent the wheel when it already exists? The response appears to be 'yes' when the 'empirical data' is not to the Ministry's liking.

Strategy 4

Investigate and improve methods of reducing the economic impacts of deer damage to the agricultural industry...

Five strategies are listed to explore, investigate and evaluate how to reduce or mitigate some of the economic loss by farmers. These ideas are not new. Information abounds on preventative measures such as fencing options, electric and non-electric, scented, as well as other technological innovations.

Other initiatives have already been presented to the provincial government by the Wildlife Action Program. The Ontario Soil and Crop Improvement Association, through their *Probing Problem Wildlife* was tasked with "Investigating measures for preventing wildlife damage to agricultural crops and livestock, evaluate costs and explor(ing) compensation options for Ontario." As stated by the OSCIA:

Resolving the wildlife control issue is not a simple one-step process, nor does the solution rest within a single industry or government department. ISCIA recognizes merit in a four way approach including education, technological innovation, legislation and cost- share. How effectively these four are blended and who delivers them need careful consideration.

Our understanding is that the program was in effect for a 2 year period.

Strategy 5

Improve and apply site-specific tools to deal with landowner and community problems.

Of particular interest are items 2 and 5:

- *investigating improved mitigative measures to reduce deer-vehicle collisions;*
- *reviewing and refining the use of site-specific additional deer seals as a tool to manage deer populations during deer hunting seasons."*

The information contained in the Appendices on Vehicle Collisions is sadly lacking as the critical data has not been presented. Some of the powerful statements pulled out of this report and quoted or paraphrased from pages 14 and 15 include:

- *collisions with wildlife have been increasing since 1988;*
- *there is a motor vehicle/wild animal collision every 38 minutes;*
- *in 2003 there were 13,729 reported wildlife collisions*
- *collisions with deer can result in serious vehicle damage, personal injury or even human mortality*

Information from one of the source documents, *Characteristics of Motor Vehicle –Wild Animal Collisions – An Ontario Case Study* by U.M. Elzohairy, Senior Research Advisor, Ministry of Transportation of Ontario, reports that data collected from 1996–2001 shows that **74.6%** of all collisions are **Property Damage Only**, 25% result in some level of

injury, while **only 0.4% are fatal collisions**. In the seven-year period from 1994 to 2001, a total of 42 fatalities occurred in Ontario. How does that measure up to accidents attributed to speed, alcohol, poor driving, etc. that don't involve wildlife? Those statistics involving PDO, Injury and Fatalities are far more damning with the responsibility lying exclusively with the driver. For example, in 1994 there 226,996 reportable accidents, resulting in 90,030 injured persons and 990 fatalities. **Now, let's start focusing on real issues that relate to more than 99% of all vehicle accidents.**

An analysis of the benefits and drawbacks of a variety of preventative techniques such as active signs, special crossings, overpasses and underpasses, scent barriers, etc. were explored in Elzohairy's report and some have been piloted in other parts of Canada. However, the research concludes that "there is still no substitute for a defensive driver." And according to a survey completed by auto insurer State Farm in June 2005 "attentive driving is still the best deterrent for such accidents. It would appear that **'better drivers would equate to less collisions'**."

Other literature also suggests that the increase in deer/vehicle collisions may be largely associated with the increase of vehicles on the road, more roadways displacing or intersecting with wildlife habitats or migration patterns, and increased use of road salt during the winter.

As we already noted above, hunting is not an effective tool to prevent overpopulation. Additionally, according to data collected, hunting can actually hurt wildlife populations. According to the information supplied by the Humane Society of the United States, the desire for deer hunters to seek out

trophy sized bucks can and has had detrimental effects on the health of deer herds [by impacting] the social structure of a herd because hunters kill the mature males ... and create a disproportionate ratio of females to males... genetically inferior bucks may be left to propagate the species, thereby weakening the overall health of the herd.

Strategy 6 focuses on the value of hunting: "*expanding the hunt to increase the harvest of female deer, expanding non-resident deer hunting opportunities and incentives for increased harvest rates, and specific mitigation measures to address hot spots*", to list a few. These strategies would no doubt be welcomed by hunters and would be perceived by some as serving a dual function by providing the optics of managing the apparent overpopulation of deer, hence reducing the human-deer conflicts as well as providing additional revenue for the MNR. However, hunting is no longer viewed as a respected sport and continues to be on the decline. More and more, society is regarding recreational hunting as an exercise in cruelty and destruction.

Need we remind you that almost every year some hunter also manages to pick off a citizen or two.

APPENDICES

Further to the comments on Vehicle Collisions under **A.3 Challenges and Issues**, we feel it necessary to respond to other issues noted in A.3.

AGRICULTURAL ISSUES

The first paragraph in this section quotes from a report submitted by the Ontario Soil and Crop Improvement Association, the same report we referenced under Strategy 4. While your comments quote the dollar amount of damage associated with wildlife and the annual cost of abatement, they do not quote the action and multi-pronged approach recommended by the OSCIA. And while the information provided here is taken from OSCIA, it does not quote from their 2002 Wildlife Action Project and present the same balanced perspective.

Brian Smith, a cash crop farmer residing near the Luther Marsh area in Wellington County, is quoted in terms of his strategies in counteracting wildlife damage. His 6-point strategy involves:

- know your fields;
- crop rotation;
- discourage nesting;
- keep your eye on your crop;
- don't swath grains;
- and anticipate (problems).

He adds: "Learn from your experience. If you always do what you always did, you'll always get what you always got."

Be it known too, that orchard farmers in Middlesex Country interviewed for this rebuttal have not experienced ANY problems with deer. Of particular interest, one farmer noted that colleagues in Windsor and Michigan resolved their deer problem by installing affordable fencing and using simple, sustainable measures that are environmentally, ecologically and 'wildlife' safe.

DISEASE TRANSMISSION

The EBR references the potential risk of disease transmission between deer and elk, noting that the diseases of paramount concern are Chronic Wasting Disease, Foot and Mouth Disease, Bovine Tuberculosis and Epizootic Hemorrhagic Disease. But then the report concludes that none of these diseases is present in wild deer in Ontario. Consequently, we may deduce that this is a non-issue regardless of its appearance in the report.

ENVIRONMENTAL IMPACTS

An interesting comment in this section is that *"intensive foraging can reduce species diversity and richness and affect other wildlife dependent upon the forest community..."*.

It almost appears that diversity may only be an issue when it is convenient for the Ministry of Natural Resources. How often have we heard the MNR spout 'let nature take it's course' in regard to all forms of wildlife? We all recognize that principle applies only when convenient for the MNR goals. Looking at this issue seriously and with

compassion, removing the animal does not resolve the problem. The attraction/food source is still there for the foraging of other animals, be it deer or other wildlife, to move in. An effective solution would be to add tree protectors, start modifying the habitat and replace or add deer resistant plants, shrubs, trees, groundcover and bulbs. For example, approximately **300 types** of deer-resistant vegetation have been recorded in The Fund for Animals, Fund Facts, Living with Deer.

RESIDENTIAL AND SUBURBAN ISSUES

The issues identified in this section are the "*foraging of planted vegetation, gardens, landscapes and lawns.*" Conflict resolution is a two way street and as we further encroach on the natural habitat of most animals, more flexibility, acceptance and a healthier attitude will be required. Failing that, resources such as the document listed above and companion documents provides a wealth of information for the home owner to make his/her property less tasty for all forms of wildlife. Homemade repellants and other deterrents also address the problem of unwanted wildlife.

PUBLIC SAFETY ISSUES

Similar to the section on Agricultural Issues, transmittable diseases such as Chronic Wasting Disease, Lyme Disease and tuberculosis are cited as health concerns in Canada and the United States. Literature exists detailing the misconceptions behind Lyme disease. Lyme disease is spread by the black legged tick; however the agent is a bacterium. According to research (Anderson et al, 1984) "it is carried in the bloodstream of a host who gets infected when bitten by a bacterium-carrying tick. Although the disease is transmitted entirely through tick bites, the disease can be transported to new areas by birds who carry the ticks." Therefore hunting **will not** be an effective tool in mitigating Lyme disease.

A University of Wisconsin–Madison researcher has also dispelled myths about the transmission of Chronic Wasting Disease. This article can be accessed by logging into www.duluthsuperior.com/mld/duluthsuperior/news/local12976580.htm

IMPLEMENTATION 6.0

According to the author(s) of these EBRs, the documents purport to be committed to a collaborative approach with interested stakeholders in addressing the human-deer and other human-wildlife conflict issues.

That sounds nice; experience with the MNR shows it isn't true.

It is significant that groups opposing the Ministry's position were not part of the original discussion group. A belated and token meeting following October 2005 workshops was held to include groups such as Ontario Wildlife Coalition, Environmental Voters, Animal Protection Institute, Earthroots, Peaceful Parks, WSPA, and VWC and so on, who were only reluctantly acknowledged as stakeholders after protesting their exclusion.

The wildlife groups who were invited to participate, amounting to less than half a dozen out of more than 40 known organizations and agencies representing more than 60

perspectives, are those known to be intrinsically linked or dependent upon the provincial government in one form or another.

CONCLUSION

If the plan and strategy involving the next steps of these EBRs only slightly mirror the two-day workshop held in October 2005, the process will continue to be exclusionary and present a biased, unbalanced perspective. Stakeholders involved in this EBR process are generally consumptive **users** of wildlife. And the handful of stakeholders who represented animal welfare concerns were skillfully cherry-picked creating an imbalance in the audience (with one or two notable exceptions who managed to muscle their way into the discussions.)

Furthermore, these EBRs are clearly designed to achieve specific goals, goals that are not obscured by the trite, polite, and vanilla white language of the EBRs. They are designed to:

- support the farm lobby in south eastern Ontario;
- unite farmer, landowner and hunter as a group with complimentary goals and outcomes;
- focus on the expansion of hunting as the primary and, apparently, only method of mitigating damage to vegetation, crops, and residential greenery and other perceived 'nuisance' activities;
- undermine and minimize the impact of other alternatives such as education and environmentally safe alternatives; and,
- embrace a biased interpretation and misrepresent 'scientific' studies (as noted in this document) to justify the intended actions

The next part of the EBR planning process offers little confidence in the outcome. This document shows a complete lack of accountability and transparency. Since there is every expectation that the MNR's predetermined plan and self-serving outcome will not be swayed by submissions to the EBR process, the integrity of the process and the MNR continues to be suspect.

It will be interesting to see if the MNR continues to abuse the EBR process, as identified in the Environmental Commissioner's document: *Broken Promises: the MNR's Failure to Safeguard Environmental Rights, Special Report to the Legislative Assembly of Ontario*, submitted by Gordon Miller, June 21, 2001. So far, there is precious little reason to believe that the MNR is contrite about its own poor performance.

RECOMMENDATIONS

Our recommendations are:

- to establish an inclusionary action plan that represents the interests of all stakeholders;
- explore **all** existing data and information as resource material as part of the decision-making process, for testing, and for implementation;

- implement long-term sustainable solutions for the environment, land and property owner;
- protect the public and environment from real, and not fabricated threats; and,
- ensure that the outcome and actions are accountable stemming from fair, open and unbiased processes.

On behalf the VWC membership, we would appreciate a response.

Respectfully submitted,



Paul Harris



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