



OFAH FILE: 452/794
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Public Input Coordinator
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SUBJECT: ERO #019-8896 - Graduated financial penalties for failing to submit mandatory hunter reports

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 700 member clubs. The OFAH Big Game and Small Game Advisory Committees have reviewed the proposed *Graduated financial penalties for failing to submit mandatory hunter reports* and submit the following comments for consideration.

Mandatory Reporting

The OFAH endorses a mandatory reporting system that supports effective wildlife management, healthy ecosystems, and sustainable hunting opportunities. Hunters are at the forefront of conservation in North America and wish to see wildlife and the habitats that support them flourish and be present for future generations. The information that hunters provide supplements government programs (e.g., aerial surveys) and is crucial for not only estimating harvest and hunter effort, but also for tracking population changes which can be driven by a whole host of other factors, including climate, habitat, predation, human activity, and disease. Hunters are the eyes on the ground and contribute to keeping Ontario's broader ecosystems healthy.

The OFAH has been involved in the review of the allocation of hunting opportunities for many years, especially for big game species such as moose and deer. We have seen first-hand how low hunter response rates can lead government wildlife managers to be conservative with tag allocations in order to prevent overharvest. Mandatory hunter reporting and the resulting higher response rates help ensure maximum sustainable hunting opportunities while at the same time supporting the long-term conservation of these species. In short, mandatory reporting can be a win for both wildlife and hunters. With hunters doing their part, the onus is on wildlife managers to leverage that information in a timely fashion to make sure the benefits to wildlife and hunters are realized.

The Current Approach

In recent years, the government established a graduated penalty approach for mandatory hunter reporting where a hunter receives a \$25 surcharge penalty for each failure to submit a mandatory report in accordance with the requirements and timeframe in regulation. The penalty must be paid before the hunter can purchase any relevant draw application, licence or tag for that species. If a hunter fails to submit a hunter report on two consecutive occasions for the same species, they are prevented from purchasing any relevant product for that species for one year. After one year, the penalties reset, and the hunter would be subject to the \$25 penalty if they subsequently fail to submit their report again. To our knowledge, the 'prevent from purchase' penalty has never been imposed on an individual in Ontario. As such, it is impossible to assess its effectiveness in promoting compliance.

The Proposed New Approach

The OFAH agrees with the overarching goal of keeping people hunting but insists that meaningful penalties are in place to ensure compliance with the law; in the absence of meaningful consequences, reporting rates will decline over time.

A graduated penalty approach better aligns with the goal of the mandatory reporting system, which is improved information for wildlife management, not punishing hunters who fail to submit their reports. Setting the appropriate value for a financial penalty is challenging, because the amount should reflect socio-economic considerations and human dimensions research on how people will respond to different penalty amounts. The OFAH advisory committees debated the appropriate penalty amounts but could not recommend a specific range of values (although no one was firmly against the proposed penalties). Instead, we place the onus on the government to ensure that the amount is sufficiently high to obtain the response rate needed as part of the graduated response. At the same time, it should not be so high that it creates a financial barrier to participation based on someone's socio-economic status.

One aspect this proposal lacks is a stated goal with regards to response rates. The implementation of mandatory reporting has resulted in approximately 90% response rate across species - mandatory reporting is working. We recommend that the government develop a target response rate for hunter reporting, drawing from the scientific literature on wildlife management and human dimensions. This would provide a benchmark for evaluating the effectiveness of the graduated penalty approach and the quality of the data resulting from it.

We ask that the government develop and transparently share how they will evaluate the benefits and impacts of the proposed graduated penalty approach, the incentives, and the mandatory reporting system as a whole. While the impact on response rates will be evident, deeper analysis should be conducted to determine who is not reporting, potential drivers of non-compliance, and how penalties are affecting future participation. Such an analysis should consider demography, geography, and how hunters interact with the Fish and Wildlife Licensing System. For example, a correlation between people buying their licences and tags through licence issuers or Service Ontario locations and failing to report may indicate a technological barrier. Also, a pattern of hunters being levied a financial penalty and then not purchasing that licence in subsequent years may indicate that the penalty amount is creating a financial barrier to participation and acting as a *de facto* lockout.

Finally, a concerted communications effort needs to be made by the government to educate hunters on the value of mandatory reporting and clearly demonstrate the outcomes of providing reports. This will increase both reporting rates and confidence that the government is meeting their wildlife management responsibilities. Wherever possible the communications should highlight the benefits to wildlife management and hunters of mandatory reporting using concrete examples. While the entire hunting community would benefit from periodic reminders of the benefits of reporting, it is particularly important to target delinquent hunters with this information (via email/phone reminders to report, for example). We strongly encourage the government to produce updated Status of the Resource reports using the information collected from mandatory reporting. All communications should be transparent about how the data is collected and used, as well as how the monies collected under this system are put to use. We fully support the fact that all funds will be directed to the Fish and Wildlife Special Purpose Account and be used in support of fish and wildlife management. The OFAH would not support any portion of these monies being directed and used elsewhere.

Conclusion

Mandatory reporting does require a consequence for failing to report, but we agree that preventing hunters from hunting is unnecessarily punitive. The OFAH supports the intent of the proposal to improve participation in mandatory reporting provided the changes are implemented in a way that supports effective wildlife management and sustainable hunting opportunities while not presenting barriers to hunter participation. We have offered recommendations that we believe will help with effective implementation to achieve all of these objectives. Thank you for considering our comments.

Yours in Conservation,



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