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Peggy Bluth
Wildlife Section
Public Input Coordinator
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
435 James Street South
Thunder Bay, ON
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Dear Minister,

ERO 013-2587 – Seeking Advice on the Future of Caribou in the Lake Superior Coast Range

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

Woodland Caribou are ecologically and culturally significant to northern Ontario's boreal forests. Farmers are both stewards of their land and stewards to those species that may pass through their land. Though caribou are significant ecologically, they can present some key risks from an agricultural perspective.

New farming practices that cause more crop residue to remain available for animals, like the woodland caribou, have unlocked new potential food sources for them in the hard winter months. Experience has shown that the population increase of similar species, such as white-tailed deer and elk, have expanded grazing areas to overlap with farm land. It is possible that a population increase in woodland caribou may result in more instances of caribou entering farm land for grazing opportunities and possibly altering their diet to prefer new food sources found on farms. This will result in crop and property damage.

Because woodland caribou are a threatened species and protected under section 9 and 10 of the ESA, it is difficult for farmers to respond to intrusions while completely avoiding the "killing, harming, or harassing" of woodland caribou, as outlined in section 9 of the ESA. Issues with woodland caribou can be avoided by adopting a similar strategy to that of the *Strategy for Preventing and Managing Human-Deer Conflicts in Southern Ontario* (2007). Like the southern Ontario strategy, farmers who experience crop losses or property damage because of problem caribou should be adequately

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compensated for the associated costs through incentives for crop protection methods, improved insurance coverage, or direct compensation.

Section 5 of the Caribou Conservation Plan (CCP) addresses the need to manage predator and prey densities within caribou ranges. Not only can the management of these animals be beneficial to caribou populations, but it can also benefit farmers. Deer may damage crops, and animals such as wolves and bears may prey on livestock. Therefore, section 5.5 of the CCP should recognize the benefits that would be added to caribou conservation efforts if farmers are assisted with removing problem animals like deer, wolves, and bears, from their land.

This could be conducted in accordance with section 31 of the Fish and Wildlife Conservation Act (1997) which permits protection of property from wildlife damage. As suggested in the *Seeking Advice on the Future of Caribou in the Lake Superior Coast Range* document, indirect control of prey species, such as deer, would in turn lower the number of predators hunting woodland caribou. Farmers should be assisted in the removal of both predators and prey animals from their properties, which would benefit both the farmer and the range's caribou population.

We appreciate this opportunity to respond to this discussion paper and thank you for consideration of our comments.

Sincerely,

Clarence Nywening,
President, Christian Farmers Federation of Ontario