



## Ottawa Field-Naturalists' Club Club des naturalistes d'Ottawa

---

December 24, 2018

Public Input Coordinator  
Species Conservation Policy Branch  
300 Water Street, Floor 5N  
Peterborough ON K9J 8M5  
Canada

Re: Environmental Registry of Ontario, number 013-4124

The Ottawa Field-Naturalists' Club strongly opposes the proposal to create a hunting season for Double-crested Cormorants. The proposal will create major conservation challenges and negative ecological impacts. There are multiple reasons for this, outlined below.

The proposal states that certain groups and individuals have expressed concerns that Double-crested Cormorants are “detrimental to fish populations, island forest habitats, other species and aesthetics.” This statement is problematic and is not supported by scientifically valid evidence. All species interact with their environment and compete with other species; while at times this interaction can have an effect, this is a normal ecological process. As a native species, the participation of Double-crested Cormorants in the ecosystem should not be categorized as “detrimental” but rather as “natural”. While cormorants do eat fish, as do a multitude of other wildlife species, they do not specifically target game fish, and have been shown to put desirable predatory pressure on invasive species such as Round Goby and Alewife. Local tree death can occur in high-density nesting colonies and on some small islands, but on larger islands or within island groups, this is shown to increase the diversity of habitat and the diversity of insects present. Increased biodiversity contributes directly to increased ecological resiliency. “Aesthetics” – whether a reference to the birds or their nesting habitats – is an entirely subjective concept unrelated to sustainability, and cannot be a basis for sound conservation management.

The proposed hunting season (15 March to 31 December) is excessively long and includes the nesting season. Conservation management programs typically protect the nesting season to ensure the sustainability of the managed species; this case should be no different. Historic experience shows that allowing hunting during nesting season can create rapid population declines, as well as lead to full or partial destruction of nests and nestlings, which is unjustifiable from either conservation or animal welfare perspectives. As well, other birds that share the nesting colonies of Double-crested Cormorants, including various species of gulls and herons, would also be disturbed by both hunting and carcass retrieval and thus subject to reduced nesting success. The proposal permits an individual hunter to kill 50 cormorants per day, or a staggering 14,000 birds per hunting season. Given that cormorants tend to

nest in a few dense and often readily-accessible colonies, a handful of hunters could wipe out much of the Ontario Great Lakes population in rather short order.

As well, the proposed hunting season includes the entire summer period, when other recreational uses (including boating, swimming, fishing, and birdwatching) of areas in and around cormorant habitats are common. Having an open hunting season throughout this time creates a significant human safety risk and denies the enjoyment of lakes and waterways to all other recreational users.

Furthermore, the lack of a possession limit will make enforcement of the proposed bag limit and carcass recovery provisions extremely difficult. Allowing cormorant meat to spoil is a waste of a natural resource, and effectively permits wanton slaughter, which is inconsistent with responsible and sustainable conservation management.

Perceived abundance is neither an indication of sustainability nor of a need for control. The recent growth in the population of Double-crested Cormorants is not a new phenomenon, but rather a recovery from severe population declines caused by past persecution and the use of the pesticide DDT. Their continued presence may also facilitate the further recovery various birds of prey, which also suffered steep declines due to DDT but have been slower to rebound. Their recovery is a conservation success, and a return to an ecological role from which the species had been absent. As the proposal indicates, populations have recently “stabilized or declined slightly,” suggesting that adding hunting pressures would cause populations to decline once again. To protect biodiversity and ecological integrity, all of Ontario’s native species should be permitted to thrive in natural environments, including those subjectively disliked by some people.

For the reasons outlined above, the Ottawa Field-Naturalists’ Club encourages the Ministry to reject the proposal.

Sincerely,



Diane Lepage  
Ottawa Field Naturalists’ Club President



Owen Clarkin  
Chair of the Conservation Committee