

Hon. John Yakabuski

[Natural Resources and Forestry](#)

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Dear John Yakabuski - Minister of Natural Resources and Forestry,

We are writing to you on behalf of ProtectNatureTO to express our strong objections to Proposal to establish a hunting season for double-crested cormorants in Ontario, posted by Ministry of Natural Resources and Forestry on Nov 19, 2018, <https://ero.ontario.ca/notice/013-4124#proposal-details>

ProtectNatureTO is a coalition of over 20 nature- and stewardship-based groups advocating for the protection of wildlife and improvement of natural areas across the City of Toronto.

In our opinion, this proposal represents a regressive and ill-conceived attempt to control population of a native species of double crested cormorants, while completely lacking of scientific credibility and justification.

The proposal fails to adopt an ecosystem-based approach to wildlife population assessments and management, a key consideration for a species as double-crested cormorants with such complex interactions with aquatic and terrestrial species and habitats. Among other things, it fails to describe a population management objective (population target) provincially or regionally.

It also seems that this Proposal is rather protecting the interests of the stakeholders, such as commercial, sport and recreational fishing, aquaculture and Ontario Federation of Anglers and Hunters, instead of addressing the issue of double crested cormorants along an ecosystem-based approach to wildlife population assessments and management, while focusing on the actual stressors on the Great Lakes ecosystem to protect this global treasure.

According to GLEAM - Great Lakes Environmental Assessment and Mapping Project, Great Lakes stressors were divided into seven categories:

- *Aquatic habitat alterations: Changes to aquatic habitat from diverse causes, such as shoreline hardening and erosion control structures, port and marina development, and tributary dams*
- *Climate change: Changes to seasonal, average, and extreme temperature, precipitation, and ice cover*
- *Coastal development: Land-based human development near lake margins, such as residential and commercial development and industrial activities*
- *Fisheries management: Changes to Great Lakes ecosystems resulting from fishing pressure, stocking activities, and aquaculture*
- *Invasive species: Changes to Great Lakes ecosystems from invasive and nuisance species in abundances not previously seen*
- *Nonpoint source pollution: Nutrients, sediments, and waterborne contaminants transported from watersheds to the Great Lakes by streams and rivers and atmospheric deposition*

- *Toxic chemical pollution: Chemical pollutants from industrial and agricultural sources*

<http://greatlakemapping.org/about-us> GLEAM - Great Lakes Environmental Assessment and Mapping Project

There is no substantive body of evidence proving that cormorants are depleting fish stocks or causing any ecological problems whatsoever. The studies conducted into this subject over the past approximately 20 years have documented no evidence in this respect, rather confirming that:

“Invasive species, most notably alewife, round goby, and white perch, contributed over 80% and 90% of the diet of cormorants by biomass and number, respectively. No salmonine species were detected suggesting that negative effects on this important fishery would likely occur only via direct competition for prey (e.g., alewife).” Invasive species sustain double-crested cormorants in southern Lake Michigan

<https://www.sciencedirect.com/science/article/pii/S0380133015002750>

The reality is that cormorants are a natural part of Ontario’s rich biodiversity and an ecologically beneficial species, being major predators of invasive fish species, like round gobies and alewives, attracting other waterbirds to their nesting sites, and serving other important functions in the ecosystems they inhabit.

Majority of double-crested cormorants colonies in Ontario are found throughout the Great Lakes, while some also inhabit inland lakes and rivers in Ontario. The Great Lakes contain about 20% of the earth’s fresh surface water and are considered a global treasure.

“The Great Lakes support a diverse array of plants and animals, with rich ecosystems that are unique in the world. The lakes provide us with fresh drinking water, food and recreational opportunities. They also supply the province with sources of electricity and numerous other economic advantages that give Ontario a valuable competitive edge.”

<https://www.ontario.ca/page/ontarios-great-lakes-strategy#section-2>

Cumulative impacts from this Proposal, if it was to become Law, could be devastating not just for the double crested cormorants but for many other non-target wildlife and aquatic species, potentially intensifying existing stressors on the entire Great Lakes ecosystem.

Mandate of Ministry of Natural Resources and Forestry is to protect Ontario’s biodiversity while promoting economic opportunities in the resource sector and supporting outdoor recreation opportunities and sustainably manage Ontario’s fish and wildlife resources.

We believe that the proposed changes pose significant harm to a native Ontario wildlife species, have the potential to negatively impact other wildlife species and habitats, and lack scientific rationale or justification.

Consequently, ProtectNatureTO expresses this way our strong opposition to the proposal.

Sincerely on behalf of ProtectNatureTO,

Lenka Holubec

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Background Information and research relevant to this letter available upon request.