



Public Input Coordinator
Ministry of the Environment, Conservation and Parks
Species Conservation Policy Branch
300 Water Street
Floor 5N
Peterborough ON
K9J 3C7

March 3, 2019

Re: EBR Registry # 013-4143: 10th Year Review of Ontario's Endangered Species Act: Discussion Paper

Dear Sir or Madam,

The Ontario Hawking Club was founded in 1984 and represents falconers in the province of Ontario. We have work closely with governments, primarily the Ontario MNRF, and others on matters of falconry policy and raptor conservation. We have participated in peregrine falcon recovery projects and have donated young birds to various peregrine falcon release projects for over 20 years.

We would like to thank you for the opportunity to comment on the review of Ontario's Endangered Species Act. We strongly support the need for effective legislation and adequate funding to protect and recover populations of species at risk, and we believe that Ontario should be a leader in these endeavors. Nevertheless, we believe that the legislation and Ontario's approach to the management of species at risk could be improved in important ways.

Under the current legislation all species are treated the same regardless of their historical abundance or distribution in the province. This has resulted in the listing of wide-spread species, such as the Acadian flycatcher and prothonotary warbler, that historically occurred only very peripherally at best, in Ontario.

Furthermore, the legislation has resulted in the development of a large number of status reports and government response statements, but much less action on the ground. There are few meaningful efforts to recover most species.

After 10 years it is clear that listing a species is much easier than recovering or protecting it, and it should be equally clear that treating each species one by one will never be effective. Habitat loss is one of the most common reasons for species decline. Often this habitat is spread out over a wide area and often it is home to multiple at-risk and declining species. A landscape approach has the potential to be far more effective for protection and recovery.

In addition to the ESA, there are other pieces of legislation, such as the Fish and Wildlife Conservation Act (FWCA) that can have a very positive impact on biodiversity and species recovery. Some of the greatest recovery successes have been species, such as wild turkey and peregrine falcon, that had a long history of use by humans. In these cases, hunters, falconers and conservationists, motivated by their direct stake in the outcomes, contributed heavily to widespread and sustained efforts that resulted in success. A listing under the ESA is incapable, on its own, of generating these types of successes and in fact, can potentially stand in the way.

In summary, we would like to see ESA legislation that does a better job of prioritizing and directing efforts to have a more positive affect “on the ground”. It needs to combine efforts on a landscape basis where possible. It needs to focus on species that had a historically significant range or population in the province. It needs to incorporate innovative ways to mitigate negative impacts and reverse declines, including working with conservation partners and stakeholders, as well as agriculture and industry.

Sincerely,

Louise Engel
President, Ontario Hawking Club