



Toronto Ornithological Club

Ministry of Natural Resources and Forestry

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Re: MNRF Proposal to Allow Open Season Hunting on Double-crested Cormorants

This letter is in comment to the Ministry of Natural Resources and Forestry's (MNRF) proposal to allow open hunting of the Double-crested Cormorant (*Phalacrocorax auritus*). The Toronto Ornithological Club (TOC) is hereby submitting a formal objection to the proposal as it is not based in science, is cruel, inhumane and immoral.

The TOC is one of the oldest birding clubs in Canada established in 1934 and we are committed to the ongoing conservation initiatives of migratory birds in Toronto and the surrounding areas, with a sound basis in contributions to scientific projects and studies.

The proposal as it stands is essentially a cull disguised as a hunt. Cormorants are a native species and their numbers have only recently recovered from being close to endangered and a significant amount of money was invested to create a healthier environment for these birds to encourage population growth.

There is no scientific evidence to suggest that Cormorants are the reason for a decline in sport fish numbers when in fact it has been shown that Round Goby (*Neogobius melanostomus*), an invasive species, have reduced populations of Ontario sport fish as they eat eggs, young and compete for the same food source.

Items in the proposal that TOC rejects include:

- The proposed reclassification of Double-crested Cormorants to game birds as they are not game birds and are largely considered to be inedible.
- The provision in the *Fish and Wildlife Conservation Act* which would exempt hunters from being required to properly dispose of the deceased birds and allow for the carcasses to spoil on site. The possible public health issues associated with the dead birds as well as the aesthetics and impact it will have on waterfront recreation remain a concern which would be shared by most communities;

- No overall bag limit and 50 birds/day.

The proposed hunting season would also cause disturbance to other sensitive species that co-nest with Cormorants. These birds are protected under the *Migratory Birds Convention Act* and include: Black-crowned Night-Heron (*Nycticorax nycticorax*), Great Blue Heron (*Ardea herodias*), and Great Egret (*Ardea alba*) as well as other species which co-nest with cormorants in Ontario such as the Ring-billed Gull (*Larus delawarensis*), Herring Gull (*Larus argentatus*), Common Tern (*Sterna hirundo*), Caspian Tern (*Hydroprogne caspia*). The TOC is also very concerned that the Common Loon (*Gavia immer*), which looks very similar to the Cormorant could be taken by accident. The MNR has not provided any mitigation to ensure that there would be no impact to these co-nesting species and there simply has been no research conducted to conclude that there would be no negative impacts.

Both members of a pair of Cormorants are required for nest success. The killing of either a male or a female during the breeding season will result in their chicks starving to death even if the other parent is present. How will this inhumane approach be handled? If a population cull is determined to be necessary through scientific study and evidence, a controlled, local cull in early spring before nesting season by the MNR would avoid these situations.

In summary, the TOC strongly believes that this proposal is flawed and request that it be rejected as it stands.

Toronto Ornithological Club



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Conservation Councillor

John Nikishawa
President