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***Celebrating 35 Years of Wildlife Habitat Conservation
Célébrons 35 ans de conservation des habitats fauniques***

July 23, 2019

Caroline Ladanowski
Director Wildlife Management and Regulatory Affairs
Canadian Wildlife Service, Environment and Climate Change Canada
351 St. Joseph Blvd
Gatineau (Québec) K1A 0H3

Dear Caroline,

This letter serves to provide comments from Wildlife Habitat Canada (WHC) on the 2019 proposed amendments to the *Migratory Birds Regulations* (modernization).

WHC's Board of Directors is generally very supportive of the proposed amendments package. We are also supportive, in principle, of the proposed changes that will allow more flexibility for minors to hunt and exempt them from purchasing a Migratory Game Bird Hunting Permit (with Canadian Wildlife Habitat Conservation Stamp affixed), and are delighted that the federal government recognizes the importance of encouraging a new generation of waterfowl hunters. Through recent human dimensions work, it is clear that migratory bird conservation is complicated and that motivation to participate in waterfowl hunting is not fully understood. Removing barriers to participate is important to WHC with the ultimate goal of creating lifelong Permit/Stamp purchasers and committed conservationists.

As you know, for 35 years, Stamp funds have been transferred to WHC to support wildlife habitat conservation across Canada. Since 1985, WHC has provided over \$50 million to support more than 1,500 habitat conservation projects. Over a 5 year period (2013-2018), each Stamp dollar has leveraged, on average, approximately \$5 in additional partner funds. The return on ECCC's investment is substantial.

The effectiveness of this funding has decreased dramatically over time. The cost of the Stamp has not increased since 1991, and the federal government's February 2018 proposal to increase the price of the Stamp was not implemented. Unfortunately, the cost of conservation has not stayed static. Additionally, we have seen a significant decrease in the number of people buying Permits/Stamps. The net effect is less support for wildlife habitat conservation across Canada.

Waterfowl hunters have a long and proud history of wildlife and habitat conservation in Canada and North America. They are supportive of the Stamp because they know they are contributing directly to "on-the-ground" habitat conservation efforts. We also know that waterfowl hunting generates approximately \$327 million annually for the Canadian economy (2012 Canadian Nature Survey).

If the federal government proceeds with these proposed exemptions, WHC requests that the loss in Stamp revenue does not impact the funding available in our future Contribution Agreement(s). This will assist in ensuring that WHC's wildlife habitat conservation work is not impacted and that the leveraged benefits of this funding model are fully realized. Based on the proposed amendments, a cost savings of \$143,000 for minor hunters through the exemption translates to a \$71,500 reduction to Stamp revenue and the loss of over \$350,000 in wildlife habitat conservation work such as wetland restoration, waterfowl population enhancement, public education and other stewardship activities.

PATRON OF WILDLIFE HABITAT CANADA
Her Excellency the Right Honourable Julie Payette
C.C., C.M.M., C.O.M., C.Q., C.D.
Governor General of Canada



PRÉSIDENTE D'HONNEUR D'HABITAT FAUNIQUE CANADA
Son Excellence la très honorable Julie Payette
C.C., C.M.M., C.O.M., C.Q., C.D.
Gouverneure générale du Canada



Thank you for the opportunity to comment.

Sincerely,

David Lee Harris
Chair, Board of Directors
Wildlife Habitat Canada

Cameron Mack
Executive Director
Wildlife Habitat Canada

cc: Board of Directors, Wildlife Habitat Canada
Susan Milburn-Hopwood, Assistant Deputy Minister, Canadian Wildlife Service, Environment and Climate Change Canada
Julie Spallin, Director General - Wildlife Management, Canadian Wildlife Service, Environment and Climate Change Canada

