

December 18, 2025

Ministry of Natural Resources - Wildlife Section
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SUBJECT: Bear Management Proposal & Public Consultation (ERO 025-0761)

Nature and Outdoor Tourism Ontario (NOTO) appreciates the opportunity to provide comments on the Ministry of Natural Resources' proposed changes to bear management under ERO posting 025-0761.

We would like to begin by acknowledging and thanking Ministry staff for the time and effort invested in consulting with bear outfitters. We appreciate the multiple opportunities provided for engagement, including sector-specific webinars and one-on-one conversations with operators. This level of outreach has been meaningful and constructive, and it has helped ensure that industry perspectives were clearly communicated and considered throughout the policy development process.

We are encouraged to see that several of the recommendations put forward by the operators have been reflected in the proposal. This clearly demonstrates a willingness by the Ministry to work collaboratively and we greatly appreciate the opportunity. Many of our members like the direction presented, and are cautiously optimistic however, there are a few concerns that were brought forward that would need to be addressed:

Population Objectives and Allocation Impacts

While we support many elements of the proposed framework, NOTO continues to have concerns regarding the proposed population objectives and the potential implications for operators across the province.

Specifically, we remain concerned about:

- How population objectives will be set and adjusted, and the pace at which changes may be implemented;
- The short- and medium-term impacts on bear allocations, particularly for operators who may significantly lose or gain allocations as a result of management changes; and
- The potential cumulative effect of allocation reductions on the overall bear population during the initial years of implementation

We believe further clarity is needed on how population objectives will be balanced with social, economic, and conservation considerations, and how transitional impacts on operators will be mitigated.

Concerns Regarding BMA Review and Governance

NOTO also has concerns regarding who will be responsible for undertaking Bear Management Area (BMA) reviews under the proposed approach. We recognize that some BMAs are geographically small or currently vacant, which adds complexity to the review process. We also acknowledge that the District personnel have important local knowledge but will need guidance to implement a review. To address these concerns, NOTO recommends:

- That BMA reviews **are not** conducted solely at the District level;
- That a dedicated, province-wide advisory committee be established to oversee or guide BMA reviews;
- That this advisory body include appropriate expertise and sector representation to ensure consistency, fairness, and transparency across the province.

A committee-led approach would help reduce variability and ensure that decisions are informed by a broader provincial perspective and are implemented in a uniform matter across the province.

Need for Province-Wide Consistency in Implementation

Finally, NOTO strongly emphasizes the importance of consistent implementation across all MNR districts. Operators who work in multiple districts require clear, predictable, and uniformly applied regulations and policies. We are concerned that leaving key elements of interpretation or implementation to individual district offices could result in:

- Inconsistent application of policy;
- Confusion among operators;
- Uneven impacts on businesses and allocations; and
- Erosion of confidence in the new management framework.

To avoid these outcomes, NOTO recommends that the Ministry provide clear, province-wide direction, standardized guidance documents, and consistent timelines for implementation, with limited discretionary interpretation at the district level.

In closing, NOTO appreciates the Ministry's ongoing efforts to modernize bear management in Ontario and thanks staff for their continued engagement with the sector. We look forward to continued collaboration as the proposal is refined and implemented, and we remain committed to working with the Ministry to achieve sustainable bear populations while supporting the long-term viability of Ontario's bear outfitting industry.

We are eager to continue discussions. Please don't hesitate to reach out to our office anytime.

Sincerely,



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