

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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November 16, 2016

Ms. Terese McIntosh
Biodiversity and Wetlands Program and Policy Advisor
Ministry of Natural Resources and Forestry
Natural Heritage Section
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Ms. McIntosh:

Subject: EBR Registry 012-7675: A Wetland Conservation Strategy for Ontario

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the Ministry of Natural Resources and Forestry (MNRF) Wetland Conservation Strategy for Ontario 2016-2030.

General Comments

The OFAH recognizes the importance of wetlands and we are pleased to see a renewed commitment (and suite of actions) from the Ontario government to conserve wetlands. We also agree a new strategic plan for wetland conservation should complement/align with other provincial and federal priorities/actions. This will increase efficiency and ultimately optimize the supply of benefits that Ontarians receive from healthy wetlands.

There is support for many of the actions in the strategy, but there is no clear commitment to increase support for these actions. A new strategy should be accompanied by adequate resources to carry out the necessary priority actions for wetland conservation.

Vision, Goals, Outcomes, and Targets

There is general support for the strategy's vision and direction for wetland conservation in Ontario; however, we believe the strategy would benefit from having some specific (short-term) objectives and priority actions that are designed to deliver results within a committed timeframe. While we appreciate the two overarching targets for monitoring success, we also recommend that the MNRF include a statement of deliverables identifying when results might be achieved for each priority action. This would also inform progress for the five-year reporting cycle beginning in 2020.

Awareness/Knowledge – We strongly support actions that seek to build understanding and promote awareness of wetland ecosystem services (e.g. green infrastructure) and the cost-benefit of protecting and/or restoring wetlands. Also, the identification and characterization of wetland habitat should be an obvious priority.

Partnership – We agree that there needs to be a commitment to strengthening existing, effective, wetland conservation partnership programs. There is general support for all of the actions identified under this goal. Wetland conservation is a shared responsibility and exploring new opportunities for collaboration (i.e. with industry) will be critical. We also encourage partnerships that will identify and prioritize wetland conservation efforts and help focus resources.

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Policy – We support actions developed under this strategic direction that identify and address where gaps and efficiencies in current policies exist. We also agree a major area of focus should be placed on improving guidance and knowledge on how to better address competing land use interests and conservation priorities.

Net Loss and offsetting policy

There is general support for developing policy approaches and tools to prevent the loss of wetlands in Ontario (e.g. mitigation hierarchy). While we appreciate the intent to develop and implement a wetland offsetting policy, we agree there are several aspects of this approach that need to be assessed to determine how it would work (and its effectiveness) across Ontario. The concept of “no net loss” must be applied to wetland function, and any hierarchy must prioritize avoidance above all else (i.e. avoid, mitigate, compensate).

Furthermore, there are certain wetland habitat types that we agree should be earmarked as inappropriate for development (i.e. mandatory avoidance) because of the temporary loss of productivity and function (before mitigation or offset) and/or through any limitations in the effectiveness of the offset or mitigation measure itself. The metrics used to measure the productivity and value (ecological and otherwise) of functional wetland habitat need to be clearly established. Relative values of wetlands need to be estimated and applied during the deliberation of an approval for development.

We also recommend strong up-front industry engagement, including the creation of an industry standard for development in, or avoidance of, irreplaceable wetland habitats. This could also include a system of identification of habitat types that should be avoided. There must be a greater focus on industry-led innovation related to sustainable development in/around wetland habitat that can truly be considered to be an offset (i.e. an offset that is engineered and sustained for a cost that would reflect the value of development).

Any development proposal related to the destruction or significant modification of wetland form or function should be heavily scrutinized and publicly available (transparent). The level of scrutiny and regulation should not be dependent on the location, proximity to human populations, or proportion of wetland habitat in the surrounding landscape.

In closing, we would like to reiterate our general support for the intent of the proposed wetland conservation strategy for Ontario.

We appreciate the opportunity to comment, and we look forward to seeing a more comprehensive wetland conservation framework.

Yours in Conservation,



Dawn Sucee
Fish and Wildlife Biologist

DS/gh

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff