

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org

OFAH FILE: 333H/452
March 13, 2017

E-MAILED
03/13/17

Ms. Cassandra Carter, Climate Change Intern
Ministry of Natural Resources and Forestry
Policy Division
Strategic and Indigenous Policy Branch
Priorities and Planning Section
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Ms. Carter:

Subject: EBR Registry Number 012-9499: Naturally Resilient: MNRF's Natural Resource Climate Adaptation Strategy (2017 -2021)

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 Naturally Resilient: MNRF's Natural Resource Climate Adaptation Strategy (2017-2021) (hereafter the Strategy).

Anglers, hunters, and trappers understand the effects of climate change first-hand and the impact that these changes can have on our natural resources and recreational activities. The OFAH has been an active member of the Ontario Biodiversity Council, the body largely responsible for guiding implementation of Ontario's Biodiversity Strategy, and more recently a member of the Climate Adaptation Network for Ontario's Ecosystem (CANOE). While there is general support for introducing a strategic framework to guide the MNRF in taking appropriate actions to continue sustainable management (and use) of natural resources in a changing climate, we are not convinced the proposed adaptation actions are adequate.

General

The strategy is very high level and would benefit from having more specific goals/objectives that are measurable, action-oriented, relevant, and time-bound (SMART). As written, the actions are far too broad to be informative for the public. As far as we can tell, the proposed actions are not quantifiable and their success cannot be measured in any way. At best, the listed actions could serve as the basis for creating more specific actions that can be implemented and evaluated. The absence of timelines for delivering on the proposed actions is also a concern. We recommend that the MNRF establish specific adaptation actions that are realistic, achievable, associated with timelines, and able to demonstrate how they meet the goals and objectives of the Strategy.

The Strategy should also clarify how/which adaptation actions will be integrated in the areas of policy and information and/or implemented (i.e. through operations and service delivery) to help offset the adverse impacts of climate change. This can be done while maintaining a broad scope (e.g. describing the creation of multi-branch committees, committing to modelling and monitoring to encourage adaptive management, etc.).

In other goals, the Strategy describes examples of initiatives and work that has been completed or are currently underway. The Strategy should not only describe how the MNRF has already been following the themes described, but also how the MNRF intends to continue to implement these actions.

Ms. Casandra Carter
March 13, 2017
Page Two

We recognize the role of the MNR in mitigating climate change and its impacts through resource management. However, we feel it is necessary to note that any climate change mitigation action that jeopardizes biodiversity, disrupts hydrologic functions, or impacts other ecological values (including hunting, angling, and trapping values) is unacceptable as it undermines Ontario's natural resiliency. For instance, it is imperative that the MNR take steps to ensure projects like hydroelectric dams, solar arrays, and industrial wind turbines are installed where, and in such a way that negative ecological impacts are avoided, fully mitigated when avoidance is not possible, and only offset as a last resort and where appropriate. Additionally, other initiatives like those proposed in *Ontario's Crown Forests: Opportunities to Enhance Carbon Storage* related to forestation of regions needs to be approached carefully to ensure ecological integrity. Ontario has a premier forest management system in place under the *Crown Forest Sustainability Act*. While there may be opportunities to encourage better practices or increase utilization that will further greenhouse gas management and climate change mitigation, these actions need to be undertaken within the natural disturbance and function emulation that is the cornerstone of sustainable forest management under the CFSA.

The OFAH has a direct stake in the specific Goals, Actions, and Examples presented in Section 3 of the Strategy. This breakdown of the Goals is to provide context to our specific comments on merits, opportunities and concerns, and encourage conversation on how the Strategy could be further developed.

Goal 1: Mainstream Adaptation

The OFAH supports the MNR taking action to ensure climate change adaptation is a key consideration when updating existing policies and programs, and developing new policies and programs. We also believe initiatives like "Natural Resource Climate Lens" could be beneficial for use by MNR policymakers and natural resources managers, to provide guidance on how to consider and integrate climate change adaptation into natural resource management planning, policy development, programs, and practices. Changing climate and ecosystem conditions may cause stresses on some species, while providing advantages to others, and other pieces of legislation, and the tools of hunting, angling, and trapping provided in them, could be used to help manage the resources.

For example, small shifts in thermal regimes can increase the abundance and range of bass. In some cases, this will result in overlap between bass and trout, where the interactions between the two can result in reduced trout recruitment. By liberalizing bass fishing regulations (e.g. longer seasons, increased limits) anglers are not only able to take advantage of climate-induced abundance increase, but also help to mitigate some of the climate change impacts on trout. Implementing a strategy of enhanced fishing opportunities provides important ecological and socio-economic benefits. Another example is the northward expansion of white-tailed deer range, which is a concern where deer populations overlap with moose and caribou populations. Management of deer populations through enhanced hunting opportunities (e.g. additional deer seals) may help mitigate risks like parasite transfer, over-browsing, and other direct and indirect impacts to species like moose and caribou. These specific cases provide examples of how existing resource management policy is already enabling from a climate change adaptation perspective. In these cases, we can use existing policy tool kits to address the changing conditions without developing new policy specific to climate change.

We support Action 1.4 to develop guidance, products and tools that provide direction for considering and adapting to the impact of climate change. It will be important for this strategy to provide guidance for resource managers to identify opportunities where policy adaptation can be used to concurrently mitigate any potential negative impacts of climate change by using sustainable resource use tools. The examples above illustrate that it is possible to look at climate change from an "opportunity" lens, as opposed to focusing solely on how to address issues.

The OFAH is in support of Action 1.5 to increase the meaningful partnership and communication with all stakeholders in the development and delivery of the projects, plans, and strategies.

Ms. Casandra Carter
March 13, 2017
Page Three

Goal 2: Build Resilience and Biodiversity

The strategy should provide better examples of potential adaptation measures/options instead of merely listing existing initiatives and work (e.g. 50 Million Tree Program and Wetland Conservation Strategy). Further, many of the proposed actions under this goal have already been identified in other strategies and policies. It is not clear what added value this strategy (and its proposed actions under this goal) will provide beyond the existing frameworks (e.g. Ontario's Biodiversity Strategy).

There are also a number of other programs that are being pursued by non-government organizations (NGOs), municipal governments, and private industry that would contribute significantly to the goals to increase the natural resilience to Ontario's diverse ecosystems. Some of these programs have been shown to be very successful due to their approaches that often differ from many agency operated programs. One example is the farmer driven and directed programs under ALUS Canada. Due to this on the ground farmer-to-farmer advocacy, ALUS has been exceptionally productive at creating natural resilient habitats and buffers while maintaining, and even improving the production of remaining prime agricultural lands. These programs, not specifically but in general, should be acknowledged in the Strategy with statements around potentially investing in/supporting these conservation programs.

Furthermore, some of the examples in the Strategy have been oversimplified to the point of being misleading. Specifically, the example about Combating Invasive Species states: "The ministry is also assessing the likelihood that non-native species may survive in Ontario under predicted climate conditions." Consistent and accurate language should be used (i.e. "non-native" being replaced with "invasive species").

Measures to build resilience should also consider existing and potential non-native species (Rainbow Trout, Brown Trout, Hungarian Partridge, etc.) that provide significant social and economic benefits. Some of these species could potentially increase resilience by finding sustainable and beneficial ecological niches under changing conditions.

Goal 3: Increase Science, Research and Knowledge

We support actions aimed at improving our knowledge of the economic implications of climate change for natural resources management and ecosystem resilience (Action 3.1). We appreciate the commitment to examine existing information and address knowledge gaps to ensure adaptation measures and decisions can be informed by the best available science.

We support advanced monitoring and reporting programs to also help identify opportunities for enhancement (Action 3.3). We recognize the importance of conducting studies to better understand and estimate climate change vulnerabilities, assess risk and inform actions (Action 3.5 and 3.6); however, we also strongly believe the MNRF needs to have a broad lens when prioritizing funding and efforts. The Strategy fails to sufficiently explain what criteria will be used to determine vulnerability. The ministry needs consider impacts on all values of natural resources and their management and not just the adaptive capacity and potential for increasing resilience for vulnerable species and habitats when. Although some species and habitats may not be as susceptible to climate change impacts or classified as "vulnerable," even minor changes could have enormous ecological, social, and economic impacts for Ontario. When assessing vulnerability, we must factor in social, culture, and economic values to ensure we are proactively building resilience in all ecosystems, not just focusing on those deemed to be the most "at risk."

Goal 4: Increase Awareness and Motivation

There is support for increased public awareness and information sharing. The OFAH is well aware of the potential for climate change to impact anglers' and hunters' access and use of natural resources. In recent years, the OFAH has communicated with anglers and hunters about how climate change influences fish and wildlife management. The MNRF should consider partnering with the OFAH to develop an education/communication plan to promote awareness of climate impacts and adaptation options.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Ms. Casandra Carter
March 13, 2017
Page Four

Goal 5: Optimize Service and Response

While there is general support the actions under this goal, the language in the actions does not necessarily match the intent of the goal which is to “optimize” services and response. Instead the actions use words like “maintain” and it is not clear what approaches will be optimized to ensure effectiveness in a changing climate.

Conclusion

In summary, the OFAH is in general support of the Strategy, but further work is needed to develop a document that will provide meaningful direction to the ministry, accurate information to the public, and accountability to the people of Ontario. Throughout the Strategy there are calls to action, vague descriptions of goals, and examples of past and current initiatives, but there is a complete lack of deliverables, explicit timelines for the accomplishment of actions, or quantitative metrics to assess progress. These factors are critical to the success of any strategy or framework, as it provides the structure to ensure adaptive management, continual improvement, and can increase internal and external ministry accountability.

The OFAH appreciates the opportunity to review Naturally Resilient: MNRF's Natural Resource Climate Adaptation Strategy (2017-2021) and participate in the conversation about the long-term sustainability of resource management and climate change adaptation in Ontario. We believe this is an important conversation, and the angling and hunting community have important perspectives to share. We look forward to working with the province further on this framework, as well as any other document, policy, plan, or specific strategy related to Ontario's natural resiliency.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

RC/gh

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