

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Ms. Andrea Pastori
Cabinet Liaison and Strategic Policy Coordinator
Ministry of Energy
Strategic, Network and Agency Policy Division
Strategic Policy and Analytics Branch
77 Grenville Street, 6th Floor
Toronto, Ontario
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Dear Ms. Pastori:

Subject: EBR Registry Number 012-8840: Planning Ontario's Energy Future: A Discussion Guide to Start the Conversation

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 Planning Ontario's Energy Future: A Discussion Guide to Start the Conversation (hereafter the Guide). We recognize the importance of energy security for the continued high quality of life and economic and social growth of Ontario, and we strongly agree there is a need for the development of a strategic plan for growth and development of sustainable and responsible energy. Ensuring sustainable growth provides long-term ecological and social health, and is an integral part of ensuring our environmental rights, as Ontarians and Canadians, is protected.

Long-term planning for energy growth and development must incorporate environmental considerations and provide direction to help ensure the protection of healthy ecosystems and protect the habitat of fish and wildlife from the risks associated with energy development. While it is important to reach greenhouse gas emissions targets, it is imperative that decisions and actions to reduce emissions do not come at the expense of other environmental services and functions related to biodiversity on both landscape and site specific scales. It is equally important to ensure that decisions take all stakeholders into consideration and do not negatively impact natural heritage and cultural activities, specifically angling, hunting and trapping. We wish to provide the following feedback on areas of particular interest to our organization, our members, and outdoorsmen and women across the province.

Ontario's Long-Term Energy Plan should operate with other guiding provincial statements and initiatives, and most notably among these other pieces is Ontario's Climate Change Action Plan (Action Plan). To accomplish the emissions goals of the Action Plan there will need to be a transition from higher carbon output fuels to low carbon output. The Guide predicts an increased reliance on electricity as the key energy source for all purposes, from transportation and distribution to residential and commercial temperature control (heating and cooling). With many consumer initiatives manipulating demand-side economics to lower the use of higher carbon fuels/energy, coupled with provincial commitments to use low carbon electricity, the production expansion of solar, hydroelectric, wind turbine, and biofuel production is likely.

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While low carbon energy sources are also called "Green Energy," these sources often have their own suite of social, economic, and ecological concerns. Lowering local biodiversity, soil degradation, environmental services disruption, land use conflicts, habitat degradation/fragmentation, intermittent energy production, direct mortality of wildlife, the removal of land from agricultural production, and many other issues have been observed from Green Energy sources/practices. Therefore, it is imperative that these technologies are continually improved on for efficiency, have appropriate mitigation strategies in place, and are only strategically installed where it is economically and ecologically sustainable to do so (e.g. as close to demand locations as possible). The first round of Large Renewable Procurement installations has increased the amount of low carbon energy in Ontario, but significant local and broad-scale ecological impacts have been observed. Therefore, it is important to remember that even with current mitigation, some projects (e.g. wind turbines, hydroelectric, etc.) have the potential to seriously compromise our terrestrial and aquatic ecosystems, including the fish and wildlife they support.

Decision-making criteria for this provincial strategy must include ecological rationale, specifically at the landscape and site specific level, as a fundamental consideration in addition to social, economic, and political concerns. In conjunction with site specific considerations, improvements in cumulative effects and integrated land management is necessary to ensure each project is not considered in isolation and fits appropriately into a broader strategy for determining where, when, and how energy projects will be established in Ontario. Other fundamental considerations that need to be included are heritage and cultural uses like angling and hunting. The suspension of the next round of Large Renewable Procurement agreements should also be used to better evaluate the impacts of previous installations and advance technologies, in regards to both the actual production of electricity and mitigation procedures for observed impacts, in order to be able to produce ecologically sustainable low carbon energy at a landscape level.

The OFAH appreciates the opportunity to review the Planning Ontario's Energy Future: A Discussion Guide to Start the Conversation and participate in the conversation about the long-term security of energy and the environment in Ontario. We look forward to working with the province further on this and any future initiatives.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

RC/jb

cc: OFAH Board of Directors
OFAH Land Use, Access, Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
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