

# 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](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)

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**E-MAILED**  
03/07/16

Ontario Pollinator Health  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Food Safety and Environmental Policy Branch  
1 Stone Road West, Floor 2  
Guelph, Ontario  
N1G 4Y2

Dear Sir or Madam:

Subject: EBR Registry Number 012-6393: Draft Ontario Pollinator Health Action Plan

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we have reviewed Ontario's Draft Pollinator Health Action Plan. In general, the OFAH supports initiatives that aim to protect and promote pollinator health, but have identified some concerns related to the draft plan.

## **Background**

Pollinators have significant ecological functions in the natural environment and in agriculture. As Ontario's oldest conservation organization maintaining functioning, healthy ecosystems is a cornerstone of our core values. As hunters, conservationists, agriculturalists, and nature enthusiasts, OFAH members and supporters have significant interests in pollinator health. The OFAH promotes the development of land use strategies, wildlife management, and resource management based on science with appropriate evaluation to measure effectiveness. A well written plan is necessary to develop strategies for healthier pollinator populations. With these principles guiding our analysis we submit the following comments related to the draft plan.

The OFAH would like to see an action plan that clearly states the vision and prime objective/outcome, promoting pollinator health and habitat, followed by logical goals and specific actions to meet those goals. These actions should be measureable, well defined, and explicitly engage the stakeholders necessary to ultimately meet these goals. We are very encouraged to see that several of the partners mentioned, such as the Alternative Land Use Services (ALUS) and University of Guelph, in the plan are not only actively involved in pollinator research and management already, but ecosystem and agriculture management, as well. We encourage the government to partner with groups like ALUS and the University of Guelph - Faculty of Agriculture, to determine how existing programs and initiatives can support the goals and objectives of this action plan. This will help facilitate more direct, timely, and effective actions towards realistic and tangible goals. There may not be a need to create an entirely new and untested program.

The plan does have a number of actions proposed that will help pollinators, especially those related to urban protection, like the pollinator education actions, and urban wildflower and pollinator promotion initiatives; however, the OFAH believes many of the proposed actions are vague and may be challenging to implement and evaluate. We recommend an identified target for the total hectares of headlands, wetlands, hedge-rows, marginal forests and brushland, and naturalized grasslands that is critical for pollinators. Not only will these lands significantly help with the health of both wild and managed pollinators, but they will also help other ministries like the Ministry of Natural Resources and Forestry reach targets related to biodiversity and species at risk management.



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**Accurate Information and Credibility**

It is critical that the information in the plan be accurate in order to maintain credibility with the biological sciences and agricultural research communities. Statements in the draft plan like “Managed honey bees in Ontario visit and pollinate a broad range of crops including apples, apricots, asparagus, blueberries, squash, and *canola*” are misleading. Though bees can help with canola hybrid breeding, it is common knowledge that cereal and oilseed crops primary pollination mechanism is wind (i.e. insect pollination is negligible). Therefore, the pollinator relationship with canola is that bees are more dependent on canola than canola on bees. These statements have the potential to erode the confidence of the agricultural community and the potential credibility of any strategies to come from the plan. Though the majority of the target audience for this plan may not be well versed in the subject matter, it should be noted the agricultural industry, and agricultural community as a whole, is very passionate and generally knowledgeable about pollinators. Therefore, it is imperative that the information remain accurate enough to maintain the respect of the agricultural community.

Other areas of concern related to agriculture and public messaging are the sections describing habitat loss and nutritional impact on pollinators. The plan should take more time to explain the issues with nutritional problems resulting from modern agricultural practices (e.g. largescale monoculture), and better explain the potential mitigation strategies that can benefit both managed and wild pollinators.

Statements in the draft such as, “Other bacterial diseases, like fungi and viruses, are a recurring issue faced by beekeepers” and “Isolated, fragmented habitats lead to loss of genetic diversity, which in turn increases the chances of inbreeding” are inaccurate and undermine the action plan’s scientific credibility.

Although many portions of the plan are accurate, logical, informative, and very well written, these sections are followed with content that is incomplete, contradictory, inaccurate and even difficult to follow at times. We are concerned that these issues may ultimately distract from the true value and messages of the plan.

**Conclusion**

The OFAH understands the importance of pollinators, managed and wild, and the necessity to protect their ecological services for the long-term sustainability of agriculture and the environment. As such, the OFAH would like to see a Pollinator Health Action Plan that takes a stewardship approach. This approach must integrate existing knowledge and action that promote pollinator health, as well as new strategic investment that will enhance current initiatives and fills identified gaps.

Going forward, the OFAH would strongly urge the province to involve the mentioned partners, as well as new potential partners, and promote inter-ministry cooperation in the development and implementation of this plan. The Government of Ontario must coordinate all interested stakeholders to fully engage and inform all Ontarians on the issue and what can be done. Conservation groups, the agricultural industry, and academia all understand the importance of pollinators, and can make significant and meaningful contributions towards healthy populations.

We look forward to receiving feedback on our current contribution, and would welcome any invitation to contribute to the Pollinator Health Action Plan in the future.

Yours in Conservation,



Robert Cole  
Land Use Policy and Habitat Specialist

RC/gh

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