

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 420A/794  
June 29, 2016

**E-MAILED**

Ms. Barb Alves, Senior Policy Advisor  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Economic Development Policy Branch  
1 Stone Road West, 2<sup>nd</sup> Floor  
Guelph, Ontario  
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Dear Ms. Alves:

Subject: EBR Registry Number 012-7458: Discussion Paper for Developing an Agriculture, Aquaculture and Food Processing Sector Strategy for Northern Ontario

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 735 member clubs, we have reviewed the Discussion Paper for Developing and Agriculture, Aquaculture and Food Processing Sector Strategy for Northern Ontario (Discussion Paper) and have the following questions, concerns, and comments.

The OFAH actively represents the interests of anglers and hunters during the development of legislation, regulations, policy, and strategies related to land use across Ontario. Agriculture, aquaculture, and food industry development is important for the diversification of industry in Northern Ontario. Sustainable agriculture and aquaculture can not only co-exist with many game species, but can increase area-specific carrying capacity for some of the most popular game species like black bear, deer, moose, and elk. That said, unfettered clearing, draining, and cultivation has historically been the leading cause of habitat destruction and population declines of many species in North America. Escapement from cage and pond aquaculture has resulted in some of the most harmful and costly invasive species introductions, and cage aquaculture has the potential to transfer diseases to native wild fish. Therefore, we are in general support of having a development strategy in place to increase agriculture, aquaculture, and food processing in Northern Ontario, so long as it adequately evaluates the ecological, economic, cultural, and social risks of other important activities and industries in Northern Ontario.

The Discussion Paper explained the intent of the strategy was to be industry/private sector driven while being provincially enabled. This could be accomplished in a number of ways. In-kind support, subsidies, project funding, and streamlining legislative processes are just a few ways that the Province of Ontario can work to increase investment and expand on agricultural and aquaculture opportunities in Northern Ontario. The Discussion Paper had examples of the Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) funding initiatives to clear forested lands and install weeping tiles and other drainage installments. This is contradictory to mandate, policy, and programs of both the Ministry of Natural Resources and Forestry (MNRF), as well as the Conservation Authorities Act and Conservation Authority (CA) under that Act. A coordinated effort should be developed to determine which lands may be applicable for use/development, and whether or not some lands should be available for private purchase.

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Wetland conservation, including conservation of fens and bogs, is becoming a significant provincial, national, and global issue. Therefore, it is important that understanding of the function of specific wetlands in an ecological, hydrological, and hydrogeological sense is important when determining whether or not drainage should occur. Research has shown that activities like drainage installation and wetland destruction are significant factors in extreme river flooding events, aquifer depletion, and in nutrient loading of watersheds. This is due to a loss of water residence time, filtration, and elimination of aquifer recharge area. Investment in the delineation and monitoring of cumulative effects is necessary to ensure sustainable development and proactively mitigate against potential flooding, nutrient loading, and aquifer depletion. This is integral in mitigating the effects of extreme weather and other issues related to global warming, and matches both provincial and federal initiatives, especially the Federal Sustainable Development Strategy. Conservation authorities, specifically the ones in Northern Ontario, will be integral in helping with sustainable land development as it relates to wetland management and regulation. In regions that do not fall under the jurisdiction of a conservation authority it is important that the MNR operates and contributes consistent policy and guidance related to any proposed drainage and management of our water resources.

The conservation of important headlands, woodlands, wetlands, and native grasslands (where they occur) is beneficial biodiversity management. Alternative Land Use Services (ALUS) Canada is an organization that works with agriculture operations across Canada helping to ensure the sustainability of farms and ranches, while enhancing the ecological goods and services on the same landscape. The farmer stewardship approach offered through ALUS Canada has proven to be very effective in providing benefits to entire ecosystems (including species at risk), while maintaining productive and sustainable operations, and offering an excellent resource for farmer-to-farmer engagement and education.

Many best practices ensuring sustainability are difficult for small farming and ranching operations to afford. Technologies and practices like precision fertilizer application and integrated pest management are difficult for operations to utilize due to the inaccessibility to laboratories for analysis, cost of shipment to labs, timelines between when samples are collected and analyzed, etc. Investment in developing more laboratory resources, or through subsidization strategies to make these technologies more affordable using existing laboratory resources could help increase productivity, increase sustainability, and reduce negative environmental impacts. This will be necessary to enable the social, ecological, and economic palatability of expanded agriculture in Northern Ontario. Increasing available information/knowledge resources for livestock producing operations by increasing availability of provincial range management specialists and range agrologists is critically important on both private and public land. With the current existence of Agricultural Land Use Permits on Crown land there is a surprising lack of agricultural expertise in the MNR. The MNR, that has a much different mandate, culture, and point-of-view from OMAFRA, should have agricultural land management expertise in house to ensure Land Use Permit management is consistent with MNR policy, mandate, and principles. The MNR agricultural expertise is necessary to ensure that agricultural use of Crown lands either benefits or does not impact wildlife, fisheries, habitat, access for hunting, fishing, and trapping, or other industries like tourism or forestry.

The OFAH is in full support of the development of policy objectives for the long-term environmental sustainability of commercial-scale cage aquaculture facilities and developing guidance regarding applications for cage aquaculture facilities in Ontario. Informational requirements for new (Type A) or expanding (Type B) operation applications should provide a scientifically-based rationale for any future expansion of the industry. The value of this information will rely on a standard and comprehensive review process.

While the OFAH does not necessarily oppose the aquaculture industries' interest in exploring other species as candidates for cage aquaculture, we suggest that due consideration is given to the potential for escapees to negatively impact the genetic conservation or viability (i.e. through inter/intraspecific competition for resources or spawning habitat) of fish that may be encountered in the adjacent natural environment. Further, when considering fish health management, we would like to reinforce our previous statement that due consideration should be given to the relative costs and benefits of such a risk to the overall resource and all of its users.

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Finally, all cage aquaculture in Ontario should be fully regulated and close management and significant planning should be applied to any new or expanding operation. More thorough comments and perspectives on aquaculture have been submitted to the MNR (EBR 012-5045) and the Ministry of Environment and Climate Change (EBR 012-7186) through recent EBR postings.

In closing, we appreciate the provincial government's dedication to sustainably developing agriculture, aquaculture, and food processing in Ontario, especially in Northern Ontario. Any proposals that will convert Crown lands into agricultural must require a full evaluation of the ecological, social, cultural, and economic trade-offs of this potentially dramatic change in land use. While we acknowledge the importance of pursuing and evaluating all potential opportunities to diversify economies and increase food security, we must not compromise other proven sustainable development activities already occurring in Northern Ontario. Fishing, hunting, trapping, forestry and other resource use industries are incredibly valuable to local, regional, provincial and national economies. All of these sectors rely on Crown lands and their natural resources and therefore, any potential risks to the productivity and sustainability of these activities must be a primary consideration for land use conversion, or proposed development on or near Crown lands. We are not suggesting that these industries cannot grow in Northern Ontario, but strongly believe that any increase must fully respect and consider traditional uses, as well as the ecological integrity, environmental services Northern Ontario lands provide.

The OFAH wishes to be involved with the development of an agriculture, aquaculture, and food processing strategy in any way possible to ensure ecological sustainability and the traditional natural-resource economics and identity of Northern Ontario are not compromised in any way by the development of agriculture, aquaculture and food processing. We look forward to receiving feedback on our current contribution, and we would welcome any invitation to contribute in the future.

Yours in Conservation,



Robert Cole  
Land Use Policy and Habitat Specialist

RC/gh

cc: OFAH Agriculture Liaison Advisory Committee  
OFAH Land Use/Trails/Access Advisory Committee  
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