

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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June 29, 2016

Ms. Mary Duda, Senior Aquatic Ecologist
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
Fisheries Section
300 Water Street
Peterborough Ontario
K9J 8M5

Dear Ms. Duda:

Subject: EBR Registry Number: 012-5045 – Application Guidelines for Cage Aquaculture Facilities

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 735 member clubs, we would like to thank the Ministry of Natural Resources and Forestry (MNR) for the opportunity to comment on the Application Guidelines for Cage Aquaculture Facilities. We have reviewed the policy proposal and are happy to provide the following input.

The OFAH is in full support of the development of guidance regarding applications for cage aquaculture facilities in Ontario. The requirements for new (Type A) or expanding (Type B) operations outlined in the appendix of the guide are quite comprehensive and 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.

The OFAH recommends that the cumulative impacts of multiple facilities on a given water body be considered during the approval process for either a Type A or B application. Each approval of a new or expanded facility would currently be considered in isolation of all other operations. The OFAH recommends that the MNR consider the proximity and scale of adjacent facilities when approving new or expanded aquaculture applications to avoid ecological and aesthetic damage to the overall landscape.

The OFAH also recommends that consideration is given to establishing two (2) lists of species that are eligible for culture under Schedule B of the Fish Licencing Regulation (Ontario Regulation 664/98), to separate species that would be appropriate for commercial cage aquaculture from species that would be reared in a more secure setting on land (i.e. Tilapia, Goldfish or Common Carp).

Section 2.2 outlines that only species present in the receiving water body would be considered appropriate candidates for culture. The OFAH is in support of this requirement; however, 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. The fish health management plan found in Appendix F addressed mitigating disease transfer to wild populations of fish; however, 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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Overall, we agree that all cage aquaculture in Ontario should be fully regulated and that close management and significant planning should be applied to any new or expanding operation. Again, we would like to thank the MNRF for the opportunity to review this important document.

Yours in Conservation,



Tom Brooke
Fisheries Biologist

TB/gh

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
Greg Farrant, OFAH Manager, Government Affairs and Policy
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