

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: 794
June 29, 2016

Ms. Madhu Malhotra, Manager
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Land and Water Policy Branch
135 St. Clair Avenue West, 6th Floor
Toronto Ontario
M4V 1P5

Dear Ms. Malhotra:

Subject: EBR Registry Number 012-7186: Provincial Policy Objectives for Managing Effects of Cage Aquaculture Operations on the Quality of Water and Sediment in Ontario's Waters

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 Environment and Climate Change (MOECC) for the opportunity to comment on the Provincial Policy Objectives for Managing Effects of Cage Aquaculture Operations on the Quality of Water and Sediment in Ontario's Waters. We have reviewed the policy proposal and have provided our input below.

The OFAH is in support of the development of policy objectives for the long-term environmental sustainability of commercial-scale cage aquaculture facilities. It is critical that habitat under consideration for new or expanded operations are well-understood both biologically and chemically to ensure that they are capable of remaining unaltered over the duration of operation of a cage aquaculture facility. As such, the OFAH is supportive of the requirement for the proponent to monitor the site prior to application to develop a baseline understanding of its characteristics. The duration of the pre-application monitoring is a very important consideration, as it must capture the entirety of the seasonal changes to the habitat and the wildlife (e.g. spawning or migration).

Additionally, we support the requirement for the proponent to continually monitor the water quality and substrate condition contained within the permitted area while the facility is operating. The frequency and required accuracy of the testing are important considerations to ensure the MOECC is gaining a suitable understanding of the operation and its impacts on the directly adjacent habitat and nearby aquaculture facilities. To further the proponent's accountability, the OFAH suggests a random or periodic auditing of the proponent's data collection and reporting procedure to ensure that it follows the standards established in the initial agreement.

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We would like to thank the MOECC again for the opportunity to provide comment on this important policy development.

Yours in Conservation,



Tom Brooke, M.Sc.
Fisheries Biologist

TB/gh

cc: Mary Duda, Sr. Aquatic Ecologist, Fisheries Section, Species Conservation Policy Branch, MNRF
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Greg Farrant, OFAH Manager, Government Affairs & Policy
OFAH Fish & Wildlife Staff