

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Sustainable Development Office
200 Sacré-Coeur Street
Box 12-3
Gatineau, Quebec
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Dear Sir or Madam:

Subject: Federal Sustainable Development Strategy Comments

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit conservation-based organization, representing 100,000 members, subscribers and supporters, and 735 member clubs. On behalf of our membership, we have reviewed the Planning for a Sustainable Future – A Federal Sustainable Development Strategy for Canada 2016-2019 (hereafter referred to as "Strategy"). We have provided the following general comments, as well as a more detailed review of the Strategy in the attached Appendix.

Overall, there is general support for the intent of the Strategy, as well as the goals and targets for a sustainable Canada. We also appreciate that the proposed Strategy reflects both domestic and international priorities and commitments. However, it is not clear what added value this Strategy will provide beyond or to complement existing efforts.

The OFAH strongly supports the development of science-based targets. We also recommend that targets for each goal be developed for appropriate effectiveness monitoring. Clear metrics and indicators should be used to measure impact and intended outcomes of implementation.

While we appreciate that the Strategy aims to meet the SMART criteria (i.e. Specific, Measurable, Achievable, Relevant, and Time-bound), we are not convinced the Strategy (in isolation) is in fact measurable, achievable, or that the identified targets express clear deadlines. For instance, many of the identified targets are binational in focus (e.g. Great Lakes) and are already being carried out (with different reporting cycles). It is not clear how they will be prioritized or how reporting will occur (i.e. be coordinated).

One other noted deficiency is with respect to the Strategy's lack of timelines for delivering on the proposed targets. We strongly recommend that the Strategy include a statement of deliverables which are achievable, measurable, and associated with a timetable.

Furthermore, if this Strategy is to be successful (i.e. achievable), commitments for additional funding will be required for implementation. We acknowledge there is a need for coordination and integration and we would like to see this better reflected within the Strategy itself. We would also like to see more incentives for private landowners for habitat restoration and enhancement.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Sustainable Development Office
June 23, 2016
Page Two

We are encouraged by the Strategy's recognition of positive work and potential future contributions/collaboration by certain communities, stakeholders, and industry groups on conservation projects and policy development. Yet we note that anglers, hunters, and trappers, a demographic which are an integral tool in resource management and conservation, are not mentioned in the Strategy. Regulated hunting, angling, and trapping are recognized federally, provincially, and internationally as being a sustainable use of wildlife and fisheries resources, as well as being economically valuable and an important heritage and cultural activity. As a group, anglers, hunters, and trappers have invested significant money and volunteer time towards the conservation of fisheries, wildlife, and habitat, yet these actions and their close connection to nature are not reflected in the Strategy.

We also recognize the importance of outreach and education as a tool to motivate community action, and believe this Strategy should be heavily linked with stewardship priorities. Creating new opportunities for community-based conservation is important, and the OFAH would like to see a stronger commitment to strengthening effective collaborations and partnerships with anglers, hunters, and trappers.

The OFAH is concerned by many of the actions in the Strategy, including any further unnecessary regulations and/or restrictions on recreational angling and hunting. The greatest impacts on fisheries and wildlife are related to habitat loss and other factors unrelated to anglers, hunters, and trappers. Further regulation of fishing, hunting, and trapping will not solve the problem.

Throughout the Strategy we have also observed a number of undefined terms, vague explanations of concepts, and multiple misleading statements and misrepresentation of information. Some of these may be due to the oversimplification of complex issues and concepts and, though it is important to try to represent information in plain language, oversimplification could result in misunderstanding and the undermining of positive work already being done to address these issues.

In closing, we appreciate the federal government's dedication to the environment and their work to ensure the long-term prosperity and health of our ecosystems and country for future generations. Thank you for the opportunity to contribute and we look forward to working with you towards a more sustainable future.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

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cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
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APPENDIX

Goal 1 – Taking Action on Climate Change

The reduction of emissions is the most easily recorded target. Yet more should be done with tangible targets for other pollutants, and increasing large-scale ecological functions that increase greenhouse gas sequestration capabilities and other key ecological services like nutrient and water cycling (including carbon cycling), than what is shown in this Strategy.

Policy review is mentioned consistently through Goal 1 targets, but to this point long-term effectiveness and efficiency of policies implemented in most jurisdictions have not been determined/evaluated. Therefore, we are curious as to what parameters will be looked at when determining what policy strategies to implement?

What rubric will the government use for evaluating impact, and what will the actions be compared to? Significant impact implies it will have a national or even global impact, but these changes may not even account for a perceptible change in the cumulative global emissions and pollution output.

In Goal 1, and all others after, terms like “green infrastructure,” “clean technology,” and “green technology” are repeatedly used. These terms need to be defined. Green infrastructure must go far beyond hydroelectric dams and wind turbines, and should include “nature-based” concepts such as wetlands, grassland prairies, forests, and lakes, because they provide ecological services that cannot be replicated through human-engineered processes. Some technologies that use the term “clean” and “green” are based entirely on carbon emissions during energy production (post construction), while others fit this nomenclature due to their minimal impacts to ecological function and footprint locally. Certain “green” technologies, such as current large-scale industrial wind technologies, can have negative ecological impacts. Therefore, it is imperative that investment in “green infrastructure” is well understood. Further research and implementation of low-impact wind technologies should be a priority. Large-scale investment and subsidies of technologies that have dramatic impact on ecological function and services, as well as pose a direct threat to wildlife should be avoided.

Goal 2 – Clean Technology and Jobs

For Target 2.1 Clean Technology and Green Infrastructure – see comments above related to green infrastructure and green technology.

Freshwater fisheries in Canada are highly regulated using the principles of conservation management. Target 2.4 Sustainable Fisheries speaks primarily on the use of regulation of fisheries as a resource as the sole means to ensure healthy sustainable fisheries. However, without the requisite habitat for any of the species that compose the “major stocks,” no amount of regulation of fisheries will adequately conserve them. Why is there no discussion about the impacts of habitat loss and other factors that influence the productivity and sustainability of fisheries in Canada? Habitat needs to be a consideration when discussing land development proposals and the cumulative impacts of development activities need to be characterised and considered on a watershed-scale to inform an understanding of what is truly sustainable. Additionally, one of the greatest threats to fisheries in Canada (in both fresh and marine ecosystems) is invasive species. The federal government plays a critical role in the prevention of the introduction of Asian Carp and controlling Sea Lamprey in the Great Lakes basin and yet, there is no mention of these efforts and their importance in maintaining a healthy fishery. The prevention and control of aquatic invasive species must continue to be a focal point for the federal approach to maintaining a healthy fishery, especially freshwater fisheries. This section suggests that simply managing the behaviours of resource users will ensure healthy fisheries resources; however, the issue is far more complex.

As mentioned in target 2.6 Sustainable Forest Management, the sustainable harvest and rejuvenation of forests is critically important for communities and economies across Canada. That said, there are some concerns about the information represented in the target. The relationship between forest fires and climate change does exist, but the subject is much more complex than what is being represented in the information.

Target 2.7 Sustainable Agriculture – does not seem to acknowledge some of the advancements of modern agriculture. Today, with technologies and practices that allow for no-till agriculture, precision fertilizer application, precision pesticide application, integrated pest management, and work with genetics (through breeding and genetic engineering) can mitigate and eliminate many concerns historically linked to poor agricultural practices. Investment should be made into the continued research in all fields, but more importantly, it is critical to engage the agricultural community and work with them to ensure that they are educated in sustainable best management practices, like habitat conservation and rehabilitation (which can help with integrated pest management).

There should be incentives subsidies for all farmers and ranchers to allow them to be able to afford and use these technologies. Initial costs for precision soil improvements and fertilizing and pest management can be expensive for some operators, especially initial sampling and laboratory costs, but long-term savings of ecological function and reduced total volume of product used will allow for the reduction of financial support needed in the long-run.

Funding for organizations like Alternative Land Use Services (ALUS Canada), or other land stewardship groups can also help increase education, conservation, and rehabilitation of landscapes and ecological services, as well. The full protection, rehabilitation, and sustainable use of ecosystems on agricultural lands cannot be achieved through regulation alone, or as compensation to correct what has been lost. Experience has shown that stewardship is one of the most effective ways to achieve conservation on private lands, so government should be investing in proven, incentive-based programs (e.g. ALUS Canada) that encourage the protection/rehabilitation and retention of natural features on private lands.

Goal 3 - National Parks, Protected Areas and Ecosystems

As a result of conflicting habitat requirements of species at risk, or the fact that individual species habitat requirements may not reflect the ecosystem as a whole, the approaches used in species at risk management are often contradictory to each other or come at the expense of other species not currently at risk. How is the management of one species at the expense of another justified? Alternatively, we suggest that strategies not be species specific, but instead, take a holistic ecosystem or landscape approach when developing recovery strategies. A landscape approach will ensure the needs of all native species within an area are adequately accounted. Therefore, more research and funding may be necessary in the fields of Range Management and Integrated Land Management to accomplish an effective Species at Risk program.

Target 3.2 Migratory Birds – is related to protecting migratory birds, and indicates a dedication for the enhancement and protection of migratory birds, and their habitat in Canada. When taken into account with Target 1.3 Sustainable Energy, and other Targets aiming for the expansion of current wind generation technologies, these are contradictory. Research in the USA, Canada, and Europe have shown that wind turbines can have negative impacts on avian species.

Target 3.3 Terrestrial Ecosystems and Habitat Conservation – suggests initiatives to conserve 17 percent of total lands and inland waters in Canada as a way to protect the ecosystem services that wildlife and humans rely on. It is important to protect and conserve lands, yet management may be necessary to ensure the ecological integrity of those landscapes. This is especially apparent when functions like fire and natural disturbance, natural predation/herbivore population regulation, or terrestrial migrations are interrupted. Modern regulated resource use practices, like hunting, angling, and trapping are low-impact activities that can be used for ecosystem management and pose no risk to the integrity of an area. As such, efforts should be made to ensure these important cultural and heritage activities are maintained in these protected ecosystems. If Canada is to increase the conserved lands to 17 percent there is a significant chance these lands will have a long-standing history of resource use. Angling, hunting, and trapping, which are recognized as sustainable and valuable heritage activities, should be ensured and utilized as a management tool within these conserved/protected areas.

First and foremost, we would like to emphasize that the OFAH does not support the use of spatial regulations like Marine Protected Areas (MPAs) as a substitute for sound, scientifically-based fish and wildlife management decisions.

The OFAH supports the inclusion of non-ecological criteria to the ecological services offered by a proposed MPA. There are essential socio-economic and cultural values that must be recognised and included in a network design. In particular, MPAs should promote the maintenance or enhancement of “public use and enjoyment.” When discussing the sustenance of commercial, recreational, and indigenous fisheries, we would expect that this is not intended to represent the exclusion of sustainable (and regulated) fisheries practices from a designated MPA in the hope that it would improve the peripheral fishery through a “spillover effect.” Our specific concern in this regard would be applying practices researched in a marine context to the Great Lakes where the potential stressors on an ecosystem could be vastly different.

Target 3.6 Invasive Alien Species – attempts to address the challenge of aquatic invasive species. It requires continued leadership and collaboration at provincial, national, and international scales. Legislative achievements have included Canada’s first ship ballast management regulations, as well as updated provincial fishery regulations to address the sale and/or live possession of invasive species such as Asian carps, Round Goby, and Rusty Crayfish in the live food fish, aquarium and baitfish trades. Ongoing risk assessment and analysis of the shipping, baitfish, aquarium, and water garden trades in partnership with federal agencies, stakeholders, and industry has greatly increased understanding of their role as pathways for invasive species introduction. These initiatives have increased capacity to focus early detection efforts on priority pathways and species. Engaging Canadians in the invasive species issue is critical to prevention, control and management efforts. The Invading Species Awareness Program (ISAP) is a national award-winning partnership program between the OFAH and the Ministry of Natural Resources and Forestry (MNR) that is recognized as an international leader in invasive species outreach and education programs involving partners from non-government and government organizations, community groups, and industry. With the participation and support leveraged from a variety of organizations and foundations, the ISAP continues to expand, reaching and educating hundreds of thousands of people across Canada each year. Ongoing investment and collaboration of Fisheries and Oceans Canada to prevent the entry of Asian Carps, manage Sea Lamprey on the Great Lakes and other efforts should be recognized and celebrated in this strategy. Further investment by the federal government to combat invasive species is required to ensure a sustainable future for Canada’s natural ecosystems.

For Target 3.7 Connecting Canadians with Nature – the heritage and cultural activities of hunting, angling, and trapping should be recognized when discussing connecting Canadians with nature. Approximately one-in-four Canadians participate in fishing, hunting, and trapping, and anglers, hunters, and trappers spend countless hours teaching others about the importance of protecting biodiversity, fish, wildlife, habitat, and ecosystem function. Not including these activities in the strategy of connecting Canadians with nature, and sustainable development of resources is a disservice to some of the most influential and effective conservationists in not only Canada and North America, but in the entire world.

Goal 4 – Freshwater and Oceans

Invasive species is a topic touched on in Target 3.6, but should be expanded within this goal too as they can have a significant impact in how aquatic ecosystems function.

Concerning the Great Lakes, Targets 4.1 Great Lakes – Canadian Areas of Concern and 4.2 Great Lakes – speak to the management of Areas of Concern (AOCs), especially related to nutrient loading, pollutant input, and invasive species. We strongly support investment into the prevention and control of invasive species, as well as the management of excessive aquatic nutrients resulting from point source and non-point sources that are equally important. Likewise, it is important that the Strategy also recognize that many nutrient issues in the lakes begin upstream.

Targets 4.6 Marine Pollution – Release of Harmful Pollutants, 4.7 Marine Pollution – Disposal at Sea and 4.9 Wastewater and Industrial Effluent – have key actions around the development of legislative and regulatory pieces and their implementation in an attempt to manage and eliminate pollution in aquatic ecosystems. There is an apparent focus on marine environments, but it is not clear if it will apply to freshwater areas. The development of legislation is a good first step, but even well written legislation will not be effective without investment in compliance. Will there be appropriate investment into compliance programs to ensure that the legislation is followed?

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

The development of better uses and conservation in Target 4.8 Protect and Conserve Coastal Ecosystems – if followed, will be significantly more effective at the long-term conservation and rehabilitation/re-establishment of habitat and fisheries than the preservationist approach brought up in Target 3.5 Marine Ecosystems.

Target 4.10 Water Resource Management – is essential to the proper management of our water resources, and work done to properly determine what we have will help in their effective management. That said, the mention of “green infrastructure” does beg the question of what this really means. If it is infrastructure mitigating impact and increasing ecological function and continuity, then this could be a very good thing. Yet, if it is the use of dams or other “green infrastructure” to generate power without addressing the ecological issues, then these investments may not necessarily lead to a sustainable future.