

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: 349A/452
October 10, 2017

Ms. Michelle Cowen, Policy Analyst
Ministry of Natural Resources and Forestry
Policy Division
Crown Forests and Lands Policy Branch
Crown Lands Section
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Ms. Cowen:

Subject: EBR Registry Number 013-1208: Policy Proposal on Adjusting Certain Public Lands Act Administrative Fees

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed proposal 013-1208. Anglers, hunters, and trappers have a long-standing interest in Crown land dispositions, and many members of the outdoors community hold a variety of dispositions as part of their activities. The use of Land Use Permits (LUPs) for the establishment of and access to hunting and fishing camps are as fundamental to many in Ontario as the ability to get angling and hunting licences. Therefore, it is imperative that cost recovery for services does not come at the expense of affordability for Ontarians, which could eliminate opportunities as surely as eliminating recreational leases or hunting seasons.

In general, the OFAH is in support of the review and proposed modification of the administrative fees for Public Lands Act disposition administrative services, with some noted concerns. Most Public Lands Act disposition, sale, and management services are provided to commercial stakeholders in Ontario, though there are also a large number of non-commercial/recreational dispositions. Cost recovery for administrative services to an individual or company/organization will help ensure that the Ministry of Natural Resources and Forestry (MNRF) budget is allocated to other programs and services that can improve natural resource management including fish and wildlife for the benefit of all Ontarians.

The proposed fee increases only apply to the creation of a new permit, license, or lease, or the transfer of a permit, license, or lease. The fees related to a re-issuance of LUPs to the same holder, for the same activity at the same location (at the end of an LUP term) will continue to be \$150, subject to annual Consumer Price Indexing. While this, in theory, provides a level of assurance of continued affordability for recreational LUP holders (for hunting and fishing camps), the OFAH does have some concerns. The Ontario government has been pushing to have all LUP agreements in a single name, either a person or organization. While some hunt camps are able to incorporate, many do not have the resources to do so and the hunt camp LUPs will be in only one camp member's name. Therefore, if there are circumstances preventing the LUP holder from getting a new issuance for the camp (for the same purpose and same location), the increased fees will apply. This could prevent small camps or camps with limited resources from having an LUP issued to another member of the camp, and eliminate their ability to continue important cultural and heritage activities at the camp they have been using for potentially generations. Is there a mechanism that could be implemented that could reduce this risk for recreational LUPs?

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Ms. Michelle Cowen

October 10, 2017

Page Two

In conclusion, the OFAH supports adjusting Public Lands Act fees to achieve cost recovery for services around lands disposition, but wish to see mechanisms in place to ensure affordability for all who have Recreational Land Use Permits. The OFAH appreciates the opportunity to work with the MNRF reviewing the proposed fee changes, and looks forward to continuing our work on this and other MNRF initiatives.

Yours in Conservation,



Robert Cole

Land Use Policy and Habitat Specialist

RC/gh

cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff