

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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TO: Fisheries and Oceans Canada
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SUBJECT: Federal Aquaculture Act

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We appreciate the opportunity to provide comment on the proposal to establish a Federal Aquaculture Act (FAA) and would like to highlight the following concerns for consideration.

The OFAH views aquaculture as an ecologically acceptable industry, provided the licensing and operational aspects are carried out in strict accordance with the applicable Acts, regulations, and government policy. Federal and provincial governments must develop aquaculture policies that provide appropriate regulatory mechanisms to develop best management practices, enforcement and compliance monitoring, and emergency responses (e.g. escapes of live imports of non-indigenous species). Without adequate funding, resourcing, and support from federal and provincial governments, the FAA will be toothless in its implementation, and Canada's fisheries will likely suffer.

Studies have indicated that aquaculture operations can significantly alter aquatic environments in the following ways: considerable overwinter mortality in forage fish species; dramatic declines in available fish habitat; decreased invertebrate densities and benthic algal production; and declines in fish body condition. That said, in some instances research has also shown positive effects to some fish including sensitive species like Lake Trout. Regardless, aquaculture operations undoubtedly have the potential to cause significant alterations to aquatic communities at various levels within the food web at high degrees of uncertainty. Because studies are often conducted on smaller waterbodies the results may not translate directly to larger systems, such as the Great Lakes. However, the lessons learned can be used as guidance to help reinforce the importance of having robust aquaculture legislation to ensure the conservation and ongoing productivity of our recreational fisheries.

There are several key areas of concern associated with aquaculture operations that the OFAH would like to call attention to including: 1) the loss or degradation of fish habitat; 2) the deleterious ecological impacts resulting from the introduction of non-indigenous species; 3) the loss of genetic fitness of indigenous species through inter-breeding with fish; 4) the spread of fish pathogens that could impact self-sustaining natural fish populations; and 5) the harvest of wild fish or gametes for the purpose of aquaculture that could impact self-sustaining natural populations. These concerns should be addressed in the FAA and strategies must be implemented to reduce the risk to fisheries and conflicts with the angling community.

Developing standalone legislation for aquaculture is a positive step forward for Canada, and its provinces and territories. The protection of freshwater (and marine) species and their ecosystems must be a top priority. There should be mandatory labelling requirements for aquaculture products that are sourced sustainably or products that have been exposed to viruses. Communication is critical to the FAA and must allow for the direct involvement of the public and stakeholders (like the OFAH) on continued development of the FAA and aquaculture operations. Moreover, this should include information sharing on concerns such as outbreaks, escaped fish numbers, fish mortalities in and outside operations, and other aspects that may be of public interest.

We would like to thank the Government of Canada again for the opportunity to provide comment on this important legislative development.

Yours in Conservation,



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AW/jb

cc: OFAH Board of Directors
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