## ONTARIO FEDERATION OF ANGLERS & HUNTERS



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OFAH FILE: 430/794 February 12, 2021

Ms. Diane Blachford Strategic Policy and Partnerships Branch 438 University Avenue, 15th Floor Toronto, Ontario M7A 1N3

Dear Ms. Blachford:

Subject: ERO #019-2826 Statement of Environmental Values for the Ministry of the Environment,

Conservation and Parks

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 have reviewed the updated Statement of Environmental Values (SEV) for the Ministry of Environment, Conservation, and Parks (MECP) and submit the following comments for consideration.

As provincial parks and conservation reserves are now within the purview of the MECP, the OFAH would like to see the application of the SEV applied in those areas, specifically the components that state a commitment to 1) use an ecosystem approach to environmental protection and resource management, 2) use a science-based approach to decision-making to protect the environment, and 3) promote the use of a range of tools that encourage environmental sustainability. For many years, the OFAH has advocated for enhancing fishing and hunting opportunities in provincial parks. These enhanced opportunities would support the commitments made within the SEV by supporting effective fish and wildlife management, and would also contribute more licence revenue to the Fish and Wildlife Special Purpose Account, generate economic activity through increased tourism, support for local economies, and increase visitation rates at Ontario Parks.

Provincial parks offer significant recreational potential for anglers and hunters that is not being fully utilized. The MECP has a prime opportunity to make improvements to infrastructure and management of parks to improve hunting and angling. Many parks do not allow hunting of any kind, but could easily accommodate hunting without conflict with other user groups, given that hunting would occur mostly in shoulder seasons where park attendance is typically low. The parks that currently permit hunting have designated areas to create distance between hunting areas and more high-use areas. Many parks that do not permit hunting have the ability to create similar areas within their boundaries. Fishing is generally permitted in Ontario parks, but only a small fraction of the incredible opportunities is realized due to a lack of adequate infrastructure and marketing.

It is the opinion of the OFAH that the use of hunting to sustainably manage wildlife is an integral part of applying the MECP SEV in Ontario. While most conservation reserves permit hunting, many provincial parks do not. Allowing hunting would potentially lead to improved outcomes for species at risk and biodiversity, both of which are mandates of the MECP. For example, many provincial parks experience issues of deer overbrowsing which negatively impacts vegetation communities. Some parks have implemented deer culls to maintain deer populations at ecologically sustainable levels. Recreational hunting offers an alternate and cost-effective method of population control.

The OFAH recommends that, to fully implement the SEV, the MECP needs to expand the current hunting and angling opportunities in their parks. Hunting is an effective way to create positive biodiversity outcomes, a benefit that the majority of the province already enjoys. There is a suite of options that parks could utilize to permit hunting in most, if not all, parks and the OFAH would like the opportunity to work with the MECP to realize those opportunities.

Thank you for your consideration of our comments.

Yours in Conservation,

Lauren Tonelli

Resource Management Specialist

LT/jb

cc: OFAH Board of Directors

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