

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 333D

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To Whom it May Concern:

Subject: Draft Federal Sustainable Development Strategy 2022 - 2026

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 draft Federal Sustainable Development Strategy 2022-2026 (FSDS) and offer the following comments for consideration.

The OFAH is supportive of the use of 17 Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda for Sustainable Development as the framework for the Strategy, as it makes it easier to determine Canada's role in this global effort. While it is important to have global alignment and shared targets, Canada needs to meet goals and targets that make sense in our national context. We would like to ensure that actions are not being taken for the sake of meeting arbitrary international targets that are not feasible or meaningful for Canada. Canadians have a robust heritage of sustainable use activities and a deep appreciation of the natural environment. This thread of sustainable use of natural resources should run through the entirety of the FSDS. The OFAH would like to see the federal government acknowledge the importance of hunting and fishing in Canada and facilitating access to nature by supporting sustainable use activities. Our comments will be scoped to several of the SDGs as they pertain to the environment and sustainable use.

We are pleased to see the concept of 'intergenerational equity' running throughout the Strategy. While the terminology may not be familiar to many anglers and hunters, the concept forms the very basis of the conservation ethic embodied by our communities. Recent human dimensions research in Ontario suggests that conservationists, particularly younger conservationists, are externally motivated to participate in conservation activities, driven by consideration of future generations and the protection of fish and wildlife on their behalf.

Chapter 6 – Clean Water and Sanitation

Ensure clean and safe water for all Canadians

The OFAH is concerned by the overly optimistic goal of completing all actions required to restore six Areas of Concern (AOCs) in the Great Lakes by 2026. There is a need to set realistic goals, objectives, and expectations for the removal of Beneficial Use Impairments and remediating and delisting AOCs, but a four-year timeframe is unrealistically short in our opinion. The International Joint Commission (IJC) recommends in the most recent assessment on Great Lakes water quality that governments continue to advance implementation of remedial actions in all remaining AOCs by “...maintaining, or accelerating, investments and action, and setting a 15-year goal for completing remedial actions at all AOCs” (IJC, 2017). As of 2021, only three AOCs have been fully restored and delisted out of Canada’s 17 nonshared and shared Canada-US Great Lakes Areas of Concern (ECCC 2021). This shows that reaching this target will require significantly increased and ongoing cooperation and investments through the Canada-Ontario Agreement and additional funding mechanisms for the implementation of Remedial Action Plans and for the ongoing maintenance of these areas. Immediate and ongoing remediation and monitoring will be extremely important as increasing temperatures and changing climatic conditions will put more stress on the Great Lakes and the AOCs.

There are multiple existing reporting requirements under the Great Lakes Water Quality Agreement (GLWQA) outlined in Section 4 (Reporting) and individual requirements for Annexes 1 to 10 (GLWQA 2013). The OFAH believes that these reporting mechanisms already meet the target to report on all nine objectives to be achieved for the Great Lakes by 2026. We strongly caution the government against duplicating existing reporting requirements. There are far greater needs for action-oriented targets and increased investments towards on-the-ground ecological outcomes.

The OFAH is supportive of developing action plans for major lakes and rivers in Canada; however, the target of ECCC putting these plans in place by 2027 seems to disregard the existing lake-wide action plans already created under the GLWQA. Again, investments should not be used to recreate work that already exists simply to have a federal version; instead, those investments should be focused on adequate, long-term funding for the implementation of plans and monitoring of restoration and protection activities. We also feel the scope of this target should be broadened. The Great Lakes, Lake Winnipeg, Lake of the Woods, St. Lawrence River, Fraser River, Mackenzie River, the Wolastoq/St. John River, and Lake Simcoe are critical Canadian waterways, but more consideration should be given to full watershed-level processes that are currently degraded, at risk, or require protection. The smaller waterways that feed these major lakes and rivers often do not have action plans but are extremely important for the health of the larger systems. Consultation with Indigenous communities would assist the government in understanding what additional waterways should be prioritized under this target. Making tangible improvements to the major lakes and rivers in Canada will also require understanding of the cumulative effects of aggregated, broad-scale impacts of minor stressors on aquatic environments. There is a need for establishing ecological thresholds and indicators, methods for quantifying cumulative effects, and strategies for reversing ongoing losses to fish and fish habitat. The OFAH recommends that the Government of Canada implement a fee-in-lieu system under the Fisheries Act for minor works, undertakings, or activities to help address cumulative effects and enable conservation funding for the restoration and protection of major lakes and rivers in Canada.

The OFAH is fully supportive of the targets to have 85% of wastewater systems on reserve achieve effluent quality standards by March 2030 and 100% of wastewater systems achieve effluent quality standards by December 2040. However, there are many targets and actions in the interim, prior to reaching those targets, that the OFAH would like to see implemented first. There is a need for mandatory public reporting of sewage overflows and bypasses to increase transparency and accountability to the general public. Establishing public reporting requirements and having real-time monitoring of sewage discharges will engage Canadians and bring awareness to the costs to human health and the environment, which will ultimately lead to better solutions, more informed decision-making, and action/implementation. Investments are needed to enable stormwater infrastructure and nature-based solutions in new and existing development. Throughout the implementation of this target there will be a need for performance baselines and thresholds for wastewater facilities and timelines in place for bringing all outdated facilities into compliance. The OFAH would also like to ensure that the federal government is taking steps to prevent chemicals of emerging concern, and other harmful substances, from making their way through wastewater and stormwater facilities. There are actions that can be taken through the Canadian Environmental Protection Act to support the actions we requested from the provincial government in our comments on the Ministry of the Environment, Conservation and Parks' (MECP) discussion paper on Municipal Wastewater and Stormwater Management in Ontario (www.ofah.org/wp-content/uploads/2022/04/MECP-wastewater-stormwater-mgmt-apr27-22.pdf).

Chapter 11 – Sustainable Cities and Communities

Improve access to transportation, parks, and green spaces, as well as cultural heritage in Canada

The OFAH is fully supportive of the establishment of a new National Urban Parks policy and the designation of national urban parks as part of a network, with a target of 15 new national urban parks by 2030. The success and lessons learned from the establishment of Ontario's Rouge National Urban Park should be used when drafting the new overarching policy for the parks. There are great opportunities to blend multi-use activities with environmental protections and remediations. These parks can be uniquely situated to deliver quality habitat and ecosystem services to areas that have lost a majority of their green spaces through development. They also provide meaningful outdoor experiences for the 73.7% of Canadians that live in Canada's large urban centres (Statistics Canada 2022). One study that looks at meaningfully engaging racialized communities in nature and nature-based programming in urban areas is *Race and Nature in the City* (Scott and Tennesi, 2020). Scott and Tennesi (2020) state "urbanization is the leading cause for the increasing psychological distance between humans and nature" and, as a result, can lead to a "lack of care and stewardship." The study cites numerous examples on the critical importance of making direct connections to nature and the human psyche, as opposed to solely focusing on cognitive experiences, and specifically lists fishing as an activity that can help overcome knowledge and information barriers, as well as economic, cultural, and psychological barriers to accessing nature. Within the new policy for national urban parks, fishing should be cemented as an encouraged activity to be permitted within all newly formed national urban parks. We also recommend that hunting be incorporated into national urban parks wherever feasible; for example, Rouge National Urban Park currently has a hyperabundance of white-tailed deer that could be managed effectively and potentially free of costs, through urban, bows-only, deer hunting. There are existing examples of urban bow-hunting opportunities in the City of Thunder Bay, Ontario, and the Municipality of Shuniah, Ontario. To avoid conflict and ensure safety, there are additional rules in place for these urban deer hunts including bow-hunting only, and minimum height requirements for hunting stands. More information on this can be found in our comments on the Multi-Species Action Plan for Rouge National Urban Park at www.ofah.org/wp-content/uploads/2022/07/ParksCanada-Multi-species-Action-Plan-RNUP-jun25-21.pdf.

These parks can also serve to connect urban residents with outdoor spaces that may currently be unattainable to them. Many people living in urban areas do not have the means (financial, vehicles/transportation, knowledge/understanding, etc.) to travel long distances for quality nature-based experiences. Facilitating sustainable, accessible opportunities in urban settings would help address one of the major barriers to participation. This is extremely important for populations of new Canadians as more than 60% of immigrants and 70% of recent immigrants live in Canada's three largest cities (Toronto, Montreal, and Vancouver), and nearly 80% of immigrants live in just 13 urban areas (Immigration, Refugees and Citizenship Canada, 2019). Greenspaces need to be accessible to people living in these urban areas to maximize participation and address the nature deficit experienced by many Canadians. This also ties into the themes mentioned in *Chapter 10: take action on environmental inequalities and collaborate on environmental and natural resource management*, where it states, "access to green space benefits all Canadians, it is especially valuable to low-income and racialized communities that are often reliant on public transportation and are less likely to have access to urban green space." This exemplifies why urban green spaces, and the ability to recreate in those spaces, is so important. By encouraging use of urban parks, the target of maintaining or increasing the number of Canadians that get out into nature will likely be met and exceeded.

The OFAH is also supportive of the target to increase annual visitation to national wildlife areas (NWAs). This target will work synergistically with the above target of increasing the number of Canadians in nature. While certain NWAs provide valuable access to recreational fishing and certain hunting opportunities, there are many that seem to unnecessarily restrict these activities. The OFAH suggests that to increase visitation, that the government examine which NWAs can support more sustainable hunting and fishing opportunities.

Chapter 13 – Climate Action

Take action on climate change and its impacts

The targets to reduce emissions under this chapter are intended to help slow the advancement of climate change and its impacts. While these are extremely necessary targets to reach, the OFAH would also like the federal government to focus additional targets on methods to build resiliency for fish and wildlife, specifically, improvements to habitat and ecosystem services. The most feasible way to increase resiliency among fish and wildlife populations is to ensure that they have sufficient high-quality habitat to meet their needs and that their populations are managed to ensure they do not outstrip that habitat's carrying capacity. This can be done by halting the destruction and/or fragmentation of fish and wildlife habitat; creating new habitat; and ensuring that management practices keep populations at ecologically sustainable levels to prevent degradation on habitat with associated declines in population health. This will ensure that the species are in better body condition and have less stressors, which allow them to better survive extreme weather events. There are benefits related to habitat creation and protections that will have wider climate change benefits than just increasing resiliency of fish and wildlife populations. Through the rehabilitation and creation of forests, grasslands, and wetlands, Canada will increase its ability to sequester carbon, moving us closer to net-zero emissions. Protecting, enhancing, and building new wetlands will not only increase biodiversity and act as carbon sinks, but also help to improve water quality and assist in containing flood waters during increased flood events in the face of climate change. These actions also feed into *Chapter 6* from a water quality perspective and *Chapter 15* from a species recovery perspective.

Chapter 15 – Life on Land

Protect and recover species, conserve Canadian biodiversity

The OFAH is supportive of the multiple targets aimed at conserving lands and waters in Canada to prevent their degradation or loss to development. This is not only critical for building resiliency to climate change but also enhances biodiversity and access to nature. However, we are deeply concerned about the existing sentiment that protected areas must preclude sustainable use. Protection without effective wildlife management limits the contributions of the protected areas in addressing climate change and biodiversity loss, and at worst could potentially lead to less diversity and ecosystem services than the surrounding areas that have wildlife management. White-tailed deer provide a clear example of why protection without population management can result in negative ecological impacts. Populations of white-tailed deer grow rapidly and overbrowse their environment, resulting in a loss of understorey plant communities, limited canopy cover replacement, and cascading trophic impacts on other species that rely on these habitats. Conversely, white-tailed deer populations kept at ecologically sustainable levels can increase biodiversity by preventing any one plant species from becoming dominant and creating a monoculture. This challenge is well documented in provincial and national parks and can be addressed by permitting hunting within these protected areas. Additionally, wildlife populations managed at ecologically sustainable levels contribute to food security, especially for communities and groups that rely on wild food for a significant part of their diet, by mitigating population fluctuations driven by extreme weather events and climate-driven disease outbreaks. It will also support important social, cultural, and economic practices tied to those wildlife populations such as the use of wild traditional foods by Indigenous peoples. This supports the federal government's comments in *Chapter 2: support a healthier and more sustainable food system* that they are advancing efforts towards reconciliation with Indigenous peoples by strengthening traditional food systems.

These special protections and designations can also unintendedly shut important stakeholders, like hunters and anglers, out of the process of conserving fish, wildlife, and habitat and helping achieve conservation goals and objectives, including restoration, recovery, and rehabilitation initiatives. Within the limits of the resource, hunting and fishing are sustainable activities compatible with special designations and should be explicitly recognized as such in policy and other strategic documents. Moreover, any decision to allow or prohibit hunting and fishing in protected areas should be transparent and scientifically defensible. For this reason, the OFAH strongly recommends a full evaluation of all federally protected areas (National Parks, National Wildlife Areas, National Marine Conservation Areas, etc.) to ensure that areas that can support hunting and fishing are permitting them. The default for these areas should be to permit hunting and fishing, and those activities should only be restricted if there are evidence-based reasons to do so. Additionally, instead of protection for the sake of protection, the federal government should be looking to Indigenous Protected and Conserved Areas to meaningfully conserve ecosystems and advance reconciliation goals.

We are fully supportive of the increased management attention for species at risk, the historic investments made through the Canada Nature Fund, and the goals in the Strategy. Unfortunately, Canada's species at risk program has become cumbersome due to the number of species, a history of insufficient funding, and the lack of political will to leverage the full power of the Species at Risk Act (SARA). The OFAH, along with many other groups (e.g., Smart Prosperity Institute), have previously raised concerns about the effectiveness of SARA and the federal species at risk program and provided detailed recommendations for constructive changes, including through our participation in the Species at Risk Advisory Committee. Reversing species loss and addressing key threats will require an ambitious and concerted effort by all provinces, territories, and the federal government. Continued implementation of the Pan-Canadian Approach to Transforming SAR Conservation in Canada will help Canada achieve its commitments to the global sustainable development goals, but success will also require an increased reliance on Section 11 Conservation Agreements, government-funded stewardship programs, and the political will to use the safety net provisions of the Act to prevent species extinctions.

The OFAH supports and is very interested in the target of increasing the percentage of migratory bird species that fall within acceptable population ranges to 70% by 2030. We are very pleased to see that this includes recognition of the need to reduce populations that are well above their acceptable population sizes. The first step to reaching this target is increase investment of both staff and budget to the Canadian Wildlife Service (CWS) to conduct more population surveys of migratory birds. We are missing information on the status of many of Canada's migratory bird populations due to limited resources. This funding must be multi-year and ongoing as population monitoring requires long-term recurring studies to ensure we have the most up-to-date information to make informed decisions. For example, from the U.S. Fish and Wildlife Service we know that the Eastern Population of Sandhill Cranes was over 94,000 in their fall survey index for 2020, which was a 9% increase from 2019 and well over the population objective of 30,000 cranes for this population (Seamans 2021). However, because CWS does not have a robust population estimate of this population within Ontario, they continue to be hesitant to introduce a hunting season on a population that greatly exceeds its population objective. A better funded CWS will allow for more confident population estimates which will lead to better management decisions, allowing for increased biodiversity and maximizing ecologically sustainable opportunities. The CWS could further its ability to manage migratory bird populations that are above their acceptable ranges by removing the requirement for hunting seasons to not exceed three and one-half months. By removing this arbitrary number, which is not routed in sustainability, wildlife managers would have a better opportunity to adequately manage overabundant species.

Within this chapter, there is an implementation strategy to prevent, detect, respond to, control, and manage invasive alien species, but no specific target. The OFAH would like to see a more results-oriented target related to managing invasive species. We would like to see the federal government establish permanent and sufficient funding for consistent, integrated, and prioritized education and outreach, early detection, and rapid response efforts to fight invasive species. As a part of this there needs to be increased funding built into Fisheries and Oceans Canada, Natural Resources Canada, Environment and Climate Change Canada, and the Canadian Food Inspect Agency's internal capacity to deliver on invasive species programing to prevent new introductions, respond rapidly to new species detections, manage the spread of established species, and work with other jurisdictions to ensure national consistency and collaboration on issues related to managing invasive species. The OFAH also recommends increased and consistent external funding to on-the-ground stakeholders to facilitate prevention, detection, response, and/or control and management programs. An example of a collaborative stakeholder led project that could benefit from federal funding would be The Green Shovels Collaborative's ambitious action plan to make Ontario Phragmites-free by 2033. In order to have meaningful action on invasive species in Canada, the Government of Canada needs to acknowledge all of the current and potential threats, including the currently protected Mute Swan. The federal government cannot reasonably reach targets related to invasive species while there is a known invasive species protected under the Migratory Bird Conventions Act. One easy step forward in managing invasive species is to work with provinces, territories, Indigenous communities, and external stakeholders to determine existing invasive species and rank them for management action. The OFAH would like to see the federal government include these more tangible targets for the management of invasive species under this FSIDS.

Chapter 16 – Peace, Justice and Strong Institutions

Enforce environmental laws, manage impacts, and evaluate sustainable development activities

The OFAH understands setting the target to maintain the annual percentage of non-compliance with environmental and wildlife laws and regulations that are addressed by enforcement action at 70% by 2026. However, we suggest increasing enforcement and monitoring capacity within the various ministries responsible for various environmental non-compliance enforcement. Compliance related to large-scale projects that warrant authorizations under legislation, such as the *Fisheries Act*, typically receive meaningful enforcement attention, which in turn results in relatively good compliance rates. Conversely, there are innumerable minor works, undertakings, or activities that occur across the landscape causing harmful alteration of habitat or even death of fish and wildlife that are going unchecked and unaccounted for. These smaller scale damages have the potential to build and lead to cumulative effects that lead to larger scale issues. Moreover, because there is a lack of administrative capacity and an inadequate review process for these minor infractions, the federal government does not have an accurate understanding of non-compliance occurring across Canada.

The OFAH is supportive of the target to restore and/or enhance a total of 5,000 hectares of natural environment through Environmental Damages Fund (EDF) projects by March 31, 2026, up from a baseline of 568 hectares in 2018. However, we want to ensure that the hectares of restored or enhanced environment is exceeding the area lost by the initial infractions that paid into the EDF, in terms of both size and ecosystem services they provided pre-damages. The amount received from fines, court orders, and voluntary payments related to environmental infractions needs to be reflective of the costs associated with restoring as much or more area than was damaged. This ensures that we have no net loss of habitat or ecosystem services as the result of allowing environmental infractions to be paid for. The OFAH would also like to ensure that there is monitoring and evaluation of how well the projects are performing after they are completed. There needs to be confidence that the long-term productivity of the areas being restored is equal to or exceeds the performance of similar natural areas. Without this monitoring, there is a high risk that the hectares being restored or enhanced are not actually providing the required ecosystem services.

Conclusions

The OFAH is fully supportive of the targets laid out and the commitments made in the FSDS, but we want to ensure that in meeting these targets that the Canadian context and the needs of Canadians are being adequately considered. These targets cannot be achieved for the sole purpose of meeting international commitments, they need to reflect Canadian values and take into consideration that Canada has robust and vast natural areas. Protections simply for the sake of protections do not make sense and what activities are prohibited in protected areas need to be determined through evidence-based decision-making. The Government of Canada has a wonderful opportunity to protect areas from disturbance and development while encouraging Canadians to reconnect with and foster their passion for the outdoors through sustainable use. The Government of Canada has many programs, funds, initiatives, and ministries that work on target areas of this Federal Sustainable Development Strategy, so the OFAH sees great opportunities for the strategy to tie together this existing work to help coordinate and enhance federal actions and investments in the ministries responsible for the management of our fish and wildlife populations, habitats, and the environment. The Strategy must also identify opportunities for collaboration with provinces/territories and others working towards similar goals to reduce redundancy, maximize efficiency with available dollars, and address current gap in funding and/or action. The level of investment required to achieve the targets in the Federal Sustainable Development Strategy cannot be achieved solely through a more efficient and integrated approach. The Government of Canada must recognize that greater investments sustained over the long term will be required.

Thank you for considering our comments.

Yours in Conservation,



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