

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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MNRF - PD - Resources Planning and Development Policy Branch  
300 Water Street, 2nd Floor, South Tower  
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Subject: ERO# 019-6160 **Proposed Updates to the Ontario Wetland Evaluation System**

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 ERO posting 019-6160 Proposed Updates to the Ontario Wetland Evaluation System and offer the following comments for consideration.

Wetlands are an extremely valuable natural resource in Ontario. According to Environment and Climate change Canada, wetlands "... support a disproportionately high number of species and are often very productive" (2016) as compared to other ecosystem types. Wetlands filter nutrient-rich and polluted waters, protect against flooding and control the dispersal of groundwater, sequester carbon from the atmosphere, and provide vital habitat to a variety of native organisms. Many valued wild game animals, including moose and waterfowl, are reliant on wetlands for food, breeding habitat, security, and more (Merendino, et al. 1995; Tendeng et al, 2016). In fact, many Southern Ontario wetlands, due to their close proximity to the Great Lakes, act as vital stopover habitat for birds migrating along the Mississippi and Atlantic flyways each year (CWS, 2014). In addition to supporting healthy populations of these species, wetlands also provide great opportunities for outdoor recreation in the form of hunting and trapping. While we acknowledge that the Ontario Wetland Evaluation System is in need of revision, we fear the proposed amendments could hinder the effectiveness of the process rather than improve upon it.

## MNRF and Expert Consultation

The Ministry of Natural Resources and Forestry plays a vital role in ensuring that Ontario's wetlands are appropriately protected, particularly with regard to vulnerable ecosystems. The proposed changes would significantly reduce the involvement that MNRF experts play in the wetland evaluation process, removing requirements from the MNRF to approve wetland boundary changes, locally significant species lists, and OWES evaluations, as a whole, in addition to removing requirements to consult local MNRF experts on unique scenarios and species.

This lack of MNRF consultation and oversight will greatly jeopardize the health of our wetlands. Individual wetlands and wetland systems are complex and unique, sometimes requiring more thorough consideration than any one protocol, including the OWES, can provide (MNRF, 2013). MNRF district employees have historically provided important context and details for evaluators to make informed decisions. The proposed changes not only eliminate the MNRF's role in almost all such cases, but they also endeavour to place almost all the responsibility on wetland evaluators and "local decision makers" such as municipalities. Many municipalities don't have the expertise or experience in wetland evaluation, thereby creating a less robust and potentially bias-friendly process. The OFAH strongly recommends the MNRF maintain its role as a valuable source of input and a key decision maker with respect to wetland protection and the wetland evaluation process.

Wetland Complexes

The OFAH is gravely concerned about the proposed elimination of “wetland complexes” from the OWES. The concept of wetland complexes, which may be defined as a grouping of wetlands with such a topography, closeness, and density that delineation into individually recognized wetlands, would not be ecologically or functionally sound (MNRF, 2013), have been a key component to the protection of closely linked wetlands in the past. If this concept is eliminated from the wetland evaluation process, innumerable (likely smaller) wetlands will no longer meet the requirements for protection. These unique ecological features are an important source of biological and ecological diversity, often representing the different wetland types that exist within a region, in addition to providing population connectivity for many vulnerable terrestrial and aquatic species (Roe & Georges, 2007; Petranka et al. 2007).

Although the proposed changes allude to the treatment of multiple “close” wetlands as a single unit in some cases, no elaboration or guidance is provided in the consultation documents. The OFAH strongly recommends that the MNRF create a new section for the purposes of outlining how and when multiple wetlands may be combined as a single unit and to ensure that all wetlands previously designated as “complexes” receive appropriate protection.

Other Sources of Information

The OFAH feels it is unnecessary to remove the lists of resources found on pages 11 and 12 of the *Proposed Updates to the Ontario Wetland Evaluation System*. These lists serve to improve the quality and consistency of wetland evaluations by providing valuable contacts and resources for information on wetland locations, boundaries, biology, and unique features. Referral to outside expertise and varied sources of information should be encouraged rather than discouraged.

Property Access

With the creation of a new “Landowner Notification and Permission” section, it is unclear whether this proposal eliminates an evaluator’s ability to use other sources of information (such as aerial imagery) to complete their evaluations in cases where landowner permission cannot be acquired. Such changes would make it impossible to complete wetland evaluations for many critical wetland systems across the province. The OWES must be adaptable, and the OFAH encourages the MNRF to update their policy to incorporate the use of new technologies such as drones and high-resolution imagery to complete evaluation requirements. We would appreciate clarification on the implications of this proposed amendment and assurance that evaluators can use all the tools at their disposal to complete these important evaluations.

Low-risk Activities

The OFAH recognizes that some low-risk activities may not require conventional permitting. However, we are concerned about the potential cumulative effects of activities (e.g., well installation) which now have reduced or eliminated permitting requirements, if overutilized. Will the MNRF impose regulations to restrict the number of “low-risk” activities done within a particular space? How will these be enforced? Additionally, the OFAH is concerned about the potential impacts of overflow from offline ponds. Without proper consideration of pond location, this “low-risk” activity could easily become a high-risk for the spread of invasive species in the event of a flood. Will there be measures set in place to prevent this and how will they be enforced?

Endangered and Threatened Species and Sensitive Habitats

There are over 200 at-risk species in Ontario, most of which are threatened by habitat loss (MECP, 2021). The OFAH has worked tirelessly, investing considerable financial, human and other resources, in the restoration of many extirpated, endangered and threatened species in Ontario, and we are alarmed at the complete elimination of endangered and threatened species as factors for consideration in the wetland evaluation process. Not only have at-risk species been removed from consideration, but so too have breeding, hibernation, staging and moulting, winter cover, and stopover habitats for all native Ontario species. Without these considerations, countless sensitive and ecologically critical wetlands will no longer be protected when, logically, they should receive the most protection.

Considering this proposed change, the OFAH feels it is extremely important that the Ministry of Environment, Conservation and Parks (MECP) continue to have an active role in reviewing OWES submissions with a species at-risk lens.

Despite increasing the role that municipalities play in the process of wetland evaluation (as well as an increased associated cost for municipalities), the proposed changes would remove a municipality's ability to designate wetlands as "locally important" for ecological, social, and functional reasons, eliminating yet another protection.

The implications of these proposed amendments are potentially significant. The OFAH strongly recommends that the MNRF amend the proposed changes to ensure the manual retains its consideration for endangered and threatened species, sensitive and important habitats, connected wetlands, and locally important wetlands.

Protecting our wetlands is critical to maintaining the health of Ontario's wild fish and game species, to creating opportunities for outdoor recreation, and to supporting conservation, as a whole.

Thank you for considering our comments. We look forward to continued discussions on how best to balance Ontario's development needs with the protection of our vital natural heritage.

Yours in Conservation,



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MR/jb

cc: OFAH Board of Directors  
OFAH Land Use/Access/Trails Advisory Committee  
OFAH Small Game/Migratory Birds/Wetlands Advisory Committee  
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