

ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Ontario Conservation Centre

OFAH FILE: 349/794
April 5, 2023

Public Input Coordinator
MNRF - CFLPB - Crown Lands Policy Section
300 Water Street, 2nd Floor, South Tower
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To Whom it May Concern:

Subject: ERO # 019-6590 Proposal to amend Ontario Regulation 161/17 to the Public Lands Act to change the requirements for camping on water over Ontario's public lands

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 019-6590 *Proposal to amend Ontario Regulation 161/17 to the Public Lands Act to change the requirements for camping on water over Ontario's public lands* and, although supportive of the initial proposal, we have concerns around the updated posting.

The OFAH was supportive of the proposal's original intent to change the on-the-water camping limit from 21 to 7 days in one location, as well as to increase the distance a camper must move after this period has passed. Small waterways are especially vulnerable to the ecological impacts of long-term camping, and the original proposal had the potential to significantly reduce camping pressure for such waterbodies. By maintaining the historic time and distance requirements (relocation of 100 metres after 21 days), the MNRF is ensuring that most watercrafts can stay on both small and large lakes for extended periods of time, potentially causing significant long-term impacts.

Some of the key sources of ecological damage that are caused by camping on water include greywater/effluent pollution, anchor collection and general damage, and the prolonged shading of vegetation. Despite acknowledging these risks, and the subsequent concerns expressed by multiple stakeholder groups, the amended version of this bill does little to reduce these significant ecological stressors.

With respect to the adjusted definition of camping unit, we are looking for clarity on the implications of this change. In excluding floating accommodations or float homes, does the MNRF intend to require these structures to have a permit? To be unable to overnight on the water at all? Or to be able to do so indefinitely? The implications of this singular amendment are unclear.

We urge the government to reconsider these amendments and consult on the original broad suite of changes to minimize harm to our aquatic resources. The OFAH would be glad to work alongside the MNR to improve the rules around camping on water over Ontario's public lands.

Yours in Conservation,

A handwritten signature in black ink that reads "Matthew Robbins". The signature is written in a cursive, flowing style.

Matthew Robbins
Fish & Wildlife Biologist

MR/jb

cc: OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Director, Policy & Programs
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