

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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Public Input Coordinator  
Species at Risk Branch - Species at Risk Recovery Section  
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Subject: ERO #019-7378 Protecting Black Ash and its habitat under the Endangered Species Act, 2007

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 #019-7378 "Protecting Black Ash and its habitat under the Endangered Species Act, 2007," and offer the following comments for consideration.

As a conservation-based organization, the OFAH is invested in the ecological health of Ontario's landscape. We have a proven track-record of conservation-advocacy, including significant investments in invasive species education, data management, and mitigation. Additionally, many valued species of game animals actively benefit from a sustainable forestry industry.

## **Application of ESA protections**

"Ontario is proposing to limit the application of the 'species protection' prohibitions in subsection 9(1) of the ESA to healthy Black Ash, those that appear to have survived exposure to EAB, located in areas of the province that have experienced significant EAB-caused mortality of ash trees."

The OFAH would be interested in knowing what the above will mean for areas immediately outside of infestation zones, or areas that become infested as the years progress. At what point does such a region gain protection moving forward?

With respect to the limited application of "species protections" to trees "...that appear to have survived exposure to EAB," otherwise known as "lingering ash," we are interested to know how the MECP plans to gather information on Ontario's existing stock of such outliers. Considering the role these organisms might play in the long-term survival of ash species, surely the responsibility of identifying lingering ash trees will not fall solely to the voluntary efforts of "qualified professionals." By the province's own estimation, less than 1% of infected trees will survive EAB infection, making it vital that every effort is put towards identifying these trees. As such, we advise that MECP develop a survey/monitoring system for this purpose.

## **Exemptions for forestry**

With this in mind, although we are generally supportive of the proposed exemptions for forestry, the OFAH feels that such exemptions should not apply to "lingering ash." It would be extremely counterproductive to allow the harvest of these important organisms. We feel it would be most responsible to require assessment of black ash stock prior to any relevant forestry activities, and to apply ESA protections to any individuals that are identified.

Additionally, the existing forestry exemption should come with the additional condition that proponents only use selective harvest strategies where black ash is present, since, according to Ontario Black Ash Recovery Strategy, “Clearcutting of Black Ash is reported to result in less natural regeneration of Black Ash due to rising water tables or from increased competition with early successional vegetation...” (ON, 2022). The existing requirement that proponents “[provide] that reasonable steps are taken to minimize adverse effects on Black Ash (e.g. through use of appropriate silvicultural or logging practices)” is simply not specific enough.

Otherwise, the OFAH is supportive of the Ministry’s aim to protect and preserve black ash trees, while maintaining practical allowances for regular resource-use activities in regions without EAB. We would be glad to work alongside the MECP to help ensure the long-term viability of ash species across Ontario.

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

cc: OFAH Board of Directors  
OFAH Land Use/Access/Trails Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Director, Policy & Programs  
Mark Ryckman, OFAH Manager, Policy  
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**References:**

Ontario Government. (2022). Black Ash recovery strategy. [Online]. <https://www.ontario.ca/page/black-ash-recovery-strategy> Last accessed October 14, 2023.