

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Hon. Pablo Rodriguez
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Hon. Steven Guilbeault
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Dear Ministers:

Subject: Floating accommodations in the Trent Severn Waterway

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. This letter addresses the continued presence of large, retrofitted shipping containers and other live-aboard watercrafts that pose a risk to ecological integrity in parts of the Trent Severn waterway, such as Gloucester Pool.

Background

Over the last several years, some Ontario waterways have experienced an increase in the number of floating accommodations, defined as "... a floating building, structure or thing, or a combination of floating buildings, structures or things, equipped or useable for overnight accommodation and not primarily designed to be used for navigation..." These structures have the potential to cause environmental, social, and economic harm to waterbodies and surrounding areas. As a result, in June 2023, the Ontario government amended the *Public Lands Act* to prohibit the use of these structures on public land covered by water.

However, it has come to our attention that floating accommodations are still being produced and sold within the Trent Severn waterway, as the waterway is under Federal jurisdiction. Due to their potential to harm Ontario's valuable aquatic resources and impair navigation and access, we feel that, at a minimum, restrictions should be placed on these structures to minimize time spent in a single location and to otherwise mitigate their impacts on water quality and fish habitat. Alternatively, the Canadian government could opt to join the Ontario government in prohibiting the use of these vessels on their waterways.

Environmental impacts

Over the long-term, floating accommodations may have serious implications for Ontario's valued aquatic resources. As watercrafts, these floating homes are not required to meet the environmental standards placed on most other forms of waterfront residence (e.g. cottages), allowing for the disposal of things like greywater directly into a waterbody. In the context of a long-term residence, the flow of any such wastewater, which frequently contains harmful chemicals, nutrients (e.g. phosphates from soap), metals, bacteria, and more, has serious negative implications for Ontario's aquatic ecosystems, and should not be permitted (Carreño & Lloret, 2021). The OFAH recommends that live-aboard vessels be required to contain their greywater until it can be properly disposed of on land.

Live-aboard watercrafts of this kind may also have direct, physical impacts on aquatic habitat. In areas where multiple floating accommodations exist, for instance, anchors may actively destroy habitat and cause increased turbidity in the water. Long-term shade, which can be created by docks and watercrafts alike, is also known to impact these habitats by causing significant declines in important vegetation (Sagerman et al. 2019).

Navigation and access

In addition to our conservation concerns, these floating structures may also create a navigation hazard. In circumstances where several of these structures exist within close proximity, the ability for anglers and other recreational boaters to navigate this area would be significantly impaired, potentially causing a safety concern and limiting their ability to access a substantial amount of water/shoreline. Public water is not real estate - it cannot and should not be someone's permanent, private space, especially if their presence is detrimental to other users and the environment.

It is critical that the federal government prioritize the ecological health of our shared aquatic resources, and the ability for all Ontarians to access them. The OFAH recommends that restrictions or prohibitions be put in place to limit the extent to which these large structures may exist across federal waters, with special emphasis on mitigating any negative ecological impacts they might have. We look forward to discussing this issue with your staff in the future.

Yours in Conservation,



Mark Ryckman
Manager of Policy

MR/jb

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

References

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