

June 15, 2021

Gillian Holloway
MNR - ROD - Regional Resources Planning Team
300 Water Street
Peterborough, ON
K9J 3C7

Sent via email to: FMZ16@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Ms. Holloway,

Re: ERO 019-3564: Fisheries Management Zone 16 – Consultation on Planning Approaches

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is pleased to have the opportunity to provide our comments to ERO 019-3564: Fisheries Management Zone 16 – Consultation on Planning Approaches.

To put our response in context, our interest in fisheries generally relates to their presence in municipal drains and/or agricultural ditches and the impact on their maintenance. It is important to remember that many of the province's ditches and drains were constructed for agricultural drainage purposes, at the farmers' expense, and were never intended as fish habitat. This original purpose of agricultural ditches and municipal drains must be remembered prior to consideration of restoration or rehabilitation of aquatic habitat in these systems.

In considering the scale of planning for Fisheries Management Zone 16 (FMZ16), there is a need for consistency across both FMZ16 and throughout the province, when looking at agricultural - related issues, while maintaining flexibility to address specific local issues or concerns.

With regards to engaging and collaborating with interested parties, OFA believes that Concept 2 with an Inter-agency Committee with relevant associations is the best approach. Relevant associations include agricultural associations like OFA and sister Ministries such as the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), municipalities, and perhaps also include drainage engineers. It is essential that these groups are included to ensure compliance can be maintained with other regulatory requirements such as the *Drainage Act*, and other practical maintenance issues while planning FMZ16.

I trust our opinions and recommendations will be given due consideration in this consultation and look forward to ongoing consultation regarding the planning approach of Fisheries Management Zone 16.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors