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*(Sent via email to [wildlifepolicy@ontario.ca](mailto:wildlifepolicy@ontario.ca))*

**Re: Building a Wildlife Management Strategy for Ontario: Discussion Paper**

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Ontario Stone, Sand & Gravel Association (OSSGA) is pleased to provide comments regarding the discussion paper on the Wildlife Management Strategy posted on the EBR# 012-8249 by the Ministry of Natural Resources and Forestry (MNRF) on August 19, 2016.

OSSGA supports the development of an overarching strategic plan for wildlife management. Ontario's growing need for infrastructure development will require adaptive and sustainable resource management to ensure that our valuable aggregates and diverse wildlife populations are both protected. OSSGA is pleased to see that the MNRF recognizes its responsibility for managing all of Ontario's natural resources in a sustainable manner for the public good. OSSGA agrees that the best approach is to "manage wildlife not in isolation but rather as part of complex, broader social-ecological systems".

**Drivers and Opportunities**

Human population growth and habitat conversion will be important drivers affecting Ontario's wildlife. **It is important that the MNRF includes opportunities for biodiversity offsetting.** OSSGA recognizes that a clear and consistent framework for biodiversity offsetting is crucial, as is establishing equivalency between the impacts and the offset but there have been several positive case studies of biodiversity offsetting recently demonstrated. Management efforts should also be focused on high-priority, vulnerable areas with irreplaceable biodiversity elements.

**Goals and Guiding Principles**

**A strategic plan must align with current policies that protect and manage Ontario's wildlife populations and habitat and the MNRF must ensure that wildlife management policies and programs are coordinated with resource management program and policy areas such as the *Aggregate Act*, the *Planning Act*, and the *Endangered Species Act*.**

Changes to wildlife management policies must be consistent with the Natural Environment policy under the ARA for licence applications and must not require additional technical studies or modifications to the approval process which would result in lengthening the application process and subsequently, production delays.

OSSGA is pleased to see that the MNRF recognizes the importance of stakeholder engagement as part of a collaborative approach to biodiversity conservation and encourages the MNRF to work closely with industry members, stakeholders and all levels of government to develop strong, effective, adaptive policies addressing wildlife management.

### **Actions/Activities to Improve Wildlife Management in Ontario**

There is opportunity to create and strengthen partnerships with industrial stakeholders through habitat creation. As aggregate sites are rehabilitated, currently the most prevalent restored land use is natural. Rehabilitated sites are naturalized in a way that conforms with the surrounding environment, through the creation of wetlands or the re-vegetation of woodlands, cultural thickets or meadows. In fact, two former aggregate sites within the Niagara Escarpment Plan Area have been successfully rehabilitated and returned to Escarpment Natural designation. This designation includes undisturbed stream valleys, wetlands and forests that provide important plant and animal habitats.

**Once the extraction process is complete, sites are restored to an original or more productive integrated land use. The aggregate industry, therefore, has the potential to create beneficial wildlife habitat contributing to the conservation and preservation of Ontario's wildlife. OSSGA encourages the MNRF to continue to develop partnerships with industry, non-government organizations, stakeholders, and interest groups to develop wildlife management strategies that ensure sustainable resource management.**

### **Wildlife Management: Temporal/Spatial Scales**

Management of broader areas and longer time frames may introduce policy too restrictive for a specific, local environment. It is imperative that the Wildlife Landscape Zones (WLZ) consider local environments, and that the MNRF identify areas where finer scales are necessary. The development of Wildlife WLZs based on ecoregions and established ecological frameworks (using Ontario's Ecological Land Classification System) is a logical approach. However, there should be caution and flexibility when making management decisions based solely on these boundaries – decision making should always be adaptive, risk based, and reflective of the appropriate resource management scales.

### **Conclusion**

**The OSSGA supports the development of a wildlife management strategy that ensures protection of both our aggregate resources and wildlife habitat. A science-based, adaptive, landscape-level management approach will allow for a management strategy that best addresses the needs and interests of Ontarian's.**

Thank you again for the consideration of our comments. Should you have any questions or concerns please do not hesitate to contact me at [azelek@ossga.com](mailto:azelek@ossga.com) or 905-507-0711.

Sincerely,  
ONTARIO STONE, SAND AND GRAVEL ASSOCIATION



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