

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org

OFAH FILE: 452/794

May 16, 2014

Mr. Warren Dunlop
Senior Aquatic Ecologist
Ministry of Natural Resources
Fisheries Policy Section
300 Water Street
Peterborough, Ontario
K9J 8M5

Dear Mr. Dunlop:

Subject: Provincial Fish Strategy for Ontario – EBR 012-0291

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 720 member clubs, we have reviewed Ontario's Provincial Fish Strategy: Fish for the Future (hereafter referred to as the Strategy), and provided comments and recommendations for your consideration.

General Comments

The Strategy will replace the Strategic Plan for Ontario's Fisheries II (SPOF II). The OFAH was heavily involved in the development of SPOF II in the early 1990s and appreciates the opportunity to participate in strategic planning for Ontario's fisheries. The OFAH would like to thank the MNR Fisheries Policy Section for continually engaging OFAH staff and the OFAH Fisheries Advisory Committee throughout the development and consultation of the Strategy.

We would like to acknowledge and express our appreciation for the MNR's decision to post the Strategy on the Environmental Registry for a 120-day public consultation period. The 120-day period offered stakeholders and the general public more opportunities to become engaged in the process, and provide feedback on the Strategy. The length of public consultation goes well beyond minimal requirements and shows that the MNR was serious about receiving meaningful feedback. This has not been our experience with the vast majority of other provincial public consultations. We expect that the benefits of this level of consultation will be evident in the final draft of the Strategy. The OFAH recommends that the MNR adopt this public consultation strategy with more of their fish and wildlife related legislation, regulations and policies.

The OFAH supports the Strategy because its primary purpose is "to improve the conservation and management of fisheries and ecosystems on which fish communities depend, and to promote, facilitate and encourage fishing as an activity that contributes to individual well-being and social, cultural, and economic well-being of communities in Ontario."

...2

Mr. Warren Dunlop
May 16, 2014
Page Two

The definition of conservation used in the Strategy is excellent, and we appreciate the explicit statement that “Conservation of the resource is the first priority” under Objective 2.2.

Specific Comments and Recommendations

Section 4 – Key Trends and Emerging Issues: Social opportunities (Table 1)

What evidence is there to support the statement that reads “greater interest in catch and release fishing and reduced demand for harvest-based fishing opportunities”? Arguably, catch and release is used more widely now than ever before in fisheries management; however, it is important to remember that it is primarily used as a means to allow for the selective harvest system that regulates the majority of our fisheries. A regulated catch and release fishery that does not allow for any harvest is relatively rare in Ontario. An angler may make a personal choice to release some or all of their catch without being required to do so; however, angler behaviours and motivations related to catch and release is a complex topic that is likely beyond the scope of this strategic document. The OFAH agrees that selective harvest using catch and release presents a way to provide sustainable fisheries that offer more overall fishing opportunities. We do not understand, however, why the statement above represents an “opportunity” as it makes it sound as if catch and release fisheries are preferred over harvest fisheries.

Section 10 – Goals, Objectives and Tactics

The OFAH is pleased to see that the Strategy highlights the important social, cultural and economic benefits of angling in Ontario. The Strategy provides direction and tactics for enhancing our knowledge and understanding of these values, and we appreciate the inclusion of the specific objective (Objective 2.3) to “increase economic, social and cultural benefits derived from fish resources.” The OFAH fully supports greater consideration of the needs and desires of anglers into fisheries management decisions.

The principles, vision, and goals of the Strategy explicitly focus on self-sustaining native fish communities. The OFAH recognizes the importance of self-sustaining native fish communities, but believes that optimal fisheries management in Ontario requires naturalized species (e.g. Chinook, Rainbow Trout, etc.) and put-grow-take (PGT) fisheries. We acknowledge that naturalized species and PGT are discussed in the document under “MNR’s Roles and Responsibilities for Fisheries Management;” however, there is no explicit recognition in the goals and objectives, and only implicit references in the tactics. Naturalized fish species and PGT fisheries have a long history of providing important ecological, economic and social benefits to the people of Ontario. The OFAH believes the Strategy has missed an important opportunity to provide more explicit strategic direction for how these fisheries management tools will continue to be utilized in Ontario’s fisheries management regime moving forward. We strongly recommend that the Strategy needs to provide more direct recognition and support for the great benefits and opportunities provided by naturalized species and PGT fisheries in the vision, goals and objectives.

The OFAH fully supports Goal 4, which discusses the importance of science and information in fisheries management. This goal includes a number of objectives and tactics that will ensure science, monitoring, and assessment remain an important tool for managing Ontario’s fisheries.

Goal 5 of the Strategy recognizes the important role of anglers for funding, stewardship and direct participation in the management of Ontario’s fisheries. The OFAH supports the Strategy’s objectives to maintain and enhance these opportunities for anglers.

The OFAH fully supports the Strategy’s recognition and policy direction for restoring Lake Ontario’s Atlantic Salmon.

Mr. Warren Dunlop
May 16, 2014
Page Three

Conclusion

There is support for the purpose of the Strategy, as many of the goals, objectives and tactics will help to improve our knowledge and management of Ontario's fisheries to enhance the many ecological, social, economic, and cultural benefits they already provide. While the Strategy outlines what Ontario is doing well to manage our fisheries now, more importantly, it has the potential to provide strategic direction and support for how we can invest in our fisheries resources (e.g. PGT fisheries) to further enhance the benefits we receive.

Thank you again for the opportunity to provide comments.

Yours in Conservation,

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

Matt DeMille, M.Sc.
Assistant Manager
Fish & Wildlife Services

MD/ds

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Dr. Terry Quinney, OFAH Provincial Manager of Fish and Wildlife Services
OFAH Fish & Wildlife Staff

Policy Proposal Notice:**Title:**

Provincial Fish Strategy for Ontario

EBR Registry

Number: 012-0291

Ministry:

Ministry of Natural Resources

Date Proposal loaded to the Registry:

January 21, 2014

Some web links in this notice have been updated due to a web migration project. If you cannot access information that was previously available, you can request assistance from the contact listed in this notice. The remainder of the notice has not been altered.

Keyword(s): Fish and Wildlife

The comment period for this proposal is now over.

Description of Policy:

The Ministry of Natural Resources (MNR) has prepared a draft Provincial Fish Strategy which is a guiding document for managing fisheries resources in Ontario. It identifies provincial fisheries goals and objectives and tactics to achieve them. The main purposes of the strategy are to improve the conservation and management of Ontario's fisheries resources; and to encourage fishing as an activity that contributes to the individual well-being and the social, cultural and economic well-being of communities in Ontario. MNR is seeking input from the public, stakeholders and Aboriginal Peoples on the content of the draft Provincial Fish Strategy. This input will be incorporated into the final Provincial Fish Strategy and will enable MNR to develop a strategy that reflects and balances the perspectives of all Ontarians.

Currently, MNR's strategic direction for the management of fisheries is provided primarily by the Strategic Plan for Ontario Fisheries II (SPOF II), which was released in 1992. Since that time, the management of fisheries in Ontario has changed considerably. New stressors have emerged and are recognized as key drivers in aquatic ecosystems, including invasive species and climate change. The mandate of MNR has evolved to include species at risk, biodiversity, renewable energy and other programs that influence the management of fish and fisheries. Through rulings of the Supreme Court of Canada and continuing dialogue with Aboriginal Peoples, MNR has an improved understanding of Aboriginal and Treaty Rights and how they may affect the allocation of fisheries than when SPOF II was developed.

The draft Provincial Fish Strategy embraces a landscape and risk-based approach to fisheries management, consistent with MNR's current transformation initiative, by providing direction on how these approaches will be applied in the context of fisheries management.

The draft Provincial Fish Strategy provides management direction to MNR staff and will better position the ministry to respond to changing stressors on the fisheries resources, changing government and societal priorities, changes to MNR's organizational structure, and changes to how our partners operate.

Contact:

Warren	Dunlop
Senior Aquatic	Ecologist
Ministry of Natural Resources	
Policy	Division
Biodiversity	Branch
Fisheries Policy	Section
300 Water	Street
Floor	5
North	Tower
Peterborough	Ontario
K9J	8M5
Phone: (705)	755-5944
Fax: (705)	755-1957

Purpose of Policy:

To invite comment on the Provincial Fish Strategy from the public, stakeholders and Aboriginal Peoples and to encourage the submission of constructive comments that will inform the final policy document.

Other Information:

The following web links provide additional (or supporting) information.

- Ontario's Provincial Fish Strategy: Fish for the Future
http://apps.mnr.gov.on.ca/public/files/er/stdprod_110232.pdf
- Background Documents:
- Management of Fish in Ontario: Background Report Supporting Ontario's Provincial Fish Strategy
http://apps.mnr.gov.on.ca/public/files/er/stdprod_110231.pdf
- Fish and Fisheries Management in Ontario: A Chronology of Events (PDF, 3.2 mb)
http://apps.mnr.gov.on.ca/public/files/er/stdprod_068673.pdf
- Taking a Broader Landscape Approach: A Policy Framework for Modernizing Ontario's Approach to Natural Resource Management (PDF, 0.4 mb)
http://apps.mnr.gov.on.ca/public/files/er/stdprod_101043.pdf
- Integrating Risk in MNR: Risk Management How to Guide
http://publicdocs.mnr.gov.on.ca/View.asp?Document_ID=27586&Attachment_ID=54591

Public Consultation:

This proposal was posted for a 120 day public review and comment period starting January 21, 2014. Comments were to be received by May 21, 2014.

All comments received during the comment period are being considered as part of the decision-making process by the Ministry of Natural Resources.

Please Note: All comments and submissions received have become part of the public record.

Other Public Consultation Opportunities:

Notice of this policy posting will be sent to provincial partners and stakeholders, and Aboriginal communities informing them of the opportunity to comment.

Add Notice into My Watch List

[ONTARIO HOME](#) | [CONTACTS](#) | [HELP](#) | [SITEMAP](#) | [FRANÇAIS](#)



This site is maintained by the Government of Ontario, Canada.

[PRIVACY](#) | [IMPORTANT NOTICES](#)

Copyright information: [© Queen's Printer for Ontario, 1994-2015](#)