

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

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Subject: Seeking feedback on proposed approaches and concepts to inform fisheries management planning for Fisheries Management Zone 16 in Southwestern Ontario

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 appreciate the opportunity at long last to provide comment on the Ministry of Natural Resources and Forestry's (MNRF) consultation on planning approaches for Fisheries Management Zone (FMZ) 16, the most populous FMZ in Ontario and connected to three of Ontario's four Great Lakes, plus Lake Simcoe. Below, you will find our responses to the questions provided in the Discussion Paper ("Towards a Planning Approach for Fisheries Management Zone (FMZ) 16"), as well as general comments and recommendations to help guide the planning process.

1. ***Do you feel that this Discussion Paper captures the key themes or priority areas for consideration with respect to fisheries management in FMZ 16?***
 - a) *Yes or no*
 - b) *If not, why? Do you have any other suggestions to improve Fisheries Management in FMZ 16?*

Yes, the Discussion Paper generally captures the key themes and/or priority areas for consideration with respect to fisheries management in FMZ 16, although there is a need to prioritize and collate this lengthy list of themes. There are opportunities to collaborate with and learn from other FMZs, particularly those already bordering Great Lakes zones with established advisory councils, including FMZ 20 (bordered by councils for FMZs 17 and 18), and FMZ 9 (bordered by councils for FMZs 6 and 10). Collaborating with neighbouring, adjacent FMZ advisory councils and management units will be critical throughout the planning process and working towards a fisheries management plan for zone 16. Furthermore, fisheries management should not stop there. Arguably, the most important aspect of a fisheries management plan is the actual implementation and long-term, continued consultation and engagement with the advisory council. Highly skilled facilitation cannot be overemphasized. The MNRF should consider selecting the appropriate staff and/or providing additional training to better equip them for the role.

2. *Of the themes identified in Table 1 (Summary of Listening Session Feedback), which themes in your opinion are most important for consideration with respect to fisheries management in FMZ 16? Please list your top three choices.*

Of the themes identified in Table 1 in the Discussion Paper, the three most important for consideration with respect to fisheries management in FMZ 16 (in no set order) are: 1) Collaboration; 2) Scale of Planning; and 3) Conservation. As standalone themes, these aspects are critical to fisheries management, but we would point out these themes can be aggregated with others in the document. For example, Collaboration should be grouped with Communication and Engagement, and Education and Outreach. We see advisory councils as the platform for where each of these themes exist. Studies and firsthand experience have shown that well-functioning advisory councils can enhance the quality of fisheries management decisions. Scale of Planning can be merged with Watershed Management and Ecosystem Approach, but also has ties to other themes including Science and Monitoring. Combining each of these themes, using a more holistic approach, will facilitate the establishment of the advisory councils, as well as help guide the planning process and the management strategies needed for the zone. Given the many significant and large rivers within FMZ 16, we would also like to highlight the need to develop a broad-scale monitoring program for flowing waters. Lastly, Conservation encompasses various sub-themes, including Dams and Barriers, and is fundamental to ensuring the sustainability and ongoing productivity of fisheries. Piggybacking off this sub-theme, we cannot stress enough the importance of migratory fishes to FMZ 16 and connecting zones including FMZs 20, 19, and 13/14. The management of recreational fisheries need to be a focal point for future management discussions that include stocking and conservation programs, such as the Lake Ontario Atlantic Salmon Restoration Program. Moving forward, consolidating overarching priorities with relevant sub-themes, and identifying other interconnected links between these themes, will be important to consider for FMZ 16.

3. *In this discussion paper, MNRF has presented concepts to address the feedback received with respect to the appropriate scale for fisheries management in FMZ 16:*
- a) *Planning at a zone level*
 - b) *Planning at a Great Lakes watershed level*
 - c) *Planning at a scale reflective of the management issue*

Option B (planning at a Great Lakes watershed level) supports the development of watershed-based plans and is the best suited for fisheries management in FMZ 16; however, this option should not be implemented as an isolated framework. There are planning strategy components provided in Options A and C that should also be built into that framework, where appropriate. For example, some issues may be better suited at the zone-wide level, such as during instances where fishing regulation changes can be standardized. But we also recognize that regulations may be difficult to standardize for unique considerations and long histories of the large tributaries in the zone.

Below the Great Lakes watershed level, there are and will be issues better addressed at a more local, targeted scale, including fisheries and watershed management planning on significant watersheds (e.g., Grand River, Credit River). There are decades of watershed planning and management experience in FMZ 16. We need to use and build off the knowledge, experience, and successes in these processes to use existing networks, planning infrastructure, and resources to benefit fisheries management planning in FMZ 16. Lessons learned and strategies for addressing these types of issues, in some instances, can be used as the building blocks to tackle similar situations across the zone. For example, fish passage/partitioning and barrier mitigation are typical issues where local considerations and stakeholder interest will merit that scale of management.

Planning across the entire zone should be coordinated by MNRF and facilitated by an annual meeting of the three subcommittees (or four if a separate inland sub-unit is considered). An example of this already exists with FMZ 20, which is divided into East and West subcommittees that also communicate as a whole.

4. *In this discussion paper, MNRF has also presented concepts to address the feedback received to help establish an effective method to engage and collaborate with interested parties in FMZ 16:*
- a) *Collaborative advisory committee*
 - b) *Inter-agency Committee*

Option A (collaborative advisory committee) is the standard that is currently used in Ontario and is a must. For FMZ 16, the advisory council should be subdivided as above into relevant subcommittees able to focus on Great Lakes watersheds. Besides being better able to address specific and/or local fisheries issues, it makes logistical sense, as most representatives will be within a reasonable driving distance of a physical meeting location, when in-person meetings are able to resume. Additionally, further consideration should be given to integrating Conservation Authorities (CAs) into the regular FMZ advisory council process. That said, due to changes that have occurred to CA mandates over the past few years, it is difficult to determine how and where CAs fit into the overall picture today. Regardless, the similarly functioning Lake Simcoe Fisheries Stakeholder Committee is an example of a working group that includes representation from the relevant CA and we see added value in the role CAs play in fisheries management in Ontario.

Option B (inter-agency committee) is unnecessary, given a realistic expectation of the level of participation we would anticipate from most of the agencies listed. Because of their lack of involvement specifically with recreational fisheries management, this would be counterproductive to the process. Option B is not present in any other FMZ and, to date, we have not heard any comment that these agencies were missed at the table or that they would like to be included in the planning process (other than CAs). Finding a way to integrate CAs into the regular FMZ advisory council process (as described above) would be more productive, and where it makes sense, other agencies could be invited to attend advisory council meetings to present on applicable fisheries topics (e.g., fish consumption and contaminants). To make Option B work as written, we need to see commitment from the agencies listed, including the assignment of experienced staff to the inter-agency committee with little turnover. Our concern is the potential for the inter-agency committee to lose sight of the intended purpose of FMZ advisory councils and that discussions at this level may supersede or interfere with the decisions or management choices made within the collaborative advisory committee. We are concerned this inter-agency committee will also dilute the practical delivery of the legislative responsibility MNRF has for managing fisheries in Ontario.

General comments

A principal component to the Ecological Framework for Recreational Fisheries Management in Ontario is stakeholder participation through FMZ advisory councils. This framework was fully implemented nearly fifteen years ago and, at this time, the first councils were launched (e.g., FMZs 6 and 9) and others have been phased in gradually over time. While these FMZs and their respective advisory councils were progressing – many of which now have fisheries management plans – FMZ 16 has been at a standstill. Even with regular prodding from the OFAH the ministry appeared to be unresponsive. Headway was made with the listening sessions that were hosted in 2017; that said, it took more than three years to summarize stakeholder feedback.

The OFAH acknowledges the inherent challenges, considerable resources, and follow-through on the backend that will be needed for FMZ 16 and commend the MNRF for continuing the engagement process. However, the amount of time elapsed since the listening sessions is disheartening, stymies enthusiasm and momentum, and can even devalue the relevancy of some input. Inaction can negatively impact participation and can lead to stakeholders questioning the credibility of the engagement process. Studies show that working groups like FMZ advisory councils can enhance environmental decision making, but this is strongly contrasted by good decisions being dependant on the quality of the participatory process (Reed, 2008). Moving forward, we urge the MNRF to be more committed to advancing planning for FMZ 16 and establishing an advisory council.

Closing remarks

The OFAH has representation on every FMZ advisory council in Ontario. Unfortunately, we have received feedback that identifies infrequent meetings, general inactivity, and outdated fisheries management plans as primary concerns. In our opinion, this goes against provincial policy, particularly the core components of fisheries management that include public involvement in management decisions. As previously expressed, the current global pandemic has given us the opportunity to improve the way groups can stay connected through online platforms. The OFAH sees the lessons learned during this time as an opportunity for the MNR to convene FMZ councils more frequently, reengage inactive councils, and establish the councils for FMZs that do not have them.

We are open about our concerns with the lack of movement for FMZ 16 and vocal about inaction with other advisory councils. That said, we appreciate the opportunity to comment, and desire to stay actively involved in getting an FMZ 16 council up and running and look forward to our long-term participation with the zone. Furthermore, there are well-functioning advisory councils in the province that should be used as models for FMZ 16. We would be happy to have future in-depth discussions on best approaches and how to reinvigorate advisory councils.

Yours in Conservation,



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References

Reed, MS. 2008. Stakeholder participation for environmental management: A literature review. *Biological Conservation* 141 (2008) 2417-2431.