

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Fish and Fish Habitat Protection Program  
Fisheries and Oceans Canada  
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Subject: Framework for Aquatic Species at Risk Conservation

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 ongoing consultation under the Fish and Fish Habitat Protection Program's Wave 2 Engagement and offer the following feedback on the Framework for Aquatic Species at Risk Conservation. Enhancements need to be made to the way species at risk (SAR) are conserved and recovered across Canada by modernizing current policies and exploring new opportunities. We support multi-species and ecosystem-based approaches but recognize that major changes will be needed to transition into a framework for the future.

### Resources and funding for multi-species approaches

Resources and funding for aquatic SAR are severely lacking; as such, a successful framework will rely heavily on reconfiguring how and where investments are currently being made. For example, efforts could be better spent on recovering globally at-risk and/or endemic species instead of range-edge populations that are common elsewhere (e.g., Spotted Gar). Similarly, attempting to recover different forms or ecotypes of a species (e.g., small- and large-bodied Lake Whitefish) can undermine the recovery and funding for aquatic SAR by creating innumerable designatable units DFO doesn't have the capacity to recover. With limited resources, there is a need to triage and focus on species where recovery is feasible and on species for which threats can be restored and/or avoided.

### Improving species at risk buy-in from all levels of government

Without first addressing the lack of buy-in for SAR from all levels of government (municipal, provincial, federal), simply adopting a "multi-species approach" isn't going to solve the decline in biodiversity and conservation outcomes for aquatic SAR in Canada. In at least one example, less than ten percent of the municipalities that received guidelines for federal SAR incorporated the principles into their official plans (Fisheries and Oceans Canada, 2018). Ontario's own "*Open for Business*" slogan aims to remove regulatory burdens and red tape for businesses which enables development, contributes to habitat losses, and puts imperiled species further away from recovery. At the federal level, we're failing to fully harness new legislative tools to protect habitat (i.e., cumulative effects) which is allowing harm to accumulate and cause a more significant impact. The groundwork must first consider making improvements to inter-agency consistency, collaboration, and better endorsement of SAR policies at all levels of government; otherwise, the multi-species framework will be toothless in its implementation.

Better offsetting ratios and collecting fees-in-lieu

We strongly feel that without first making enhancements to policies for offsetting ratios and exploring funding streams for SAR via fees-in-lieu, the framework will fall short of the desired conservation outcomes regardless of whether it is a single- or multi-species framework. Nearly ninety percent of compensation projects causing harm to fish habitat in Canada did not result in a net gain in habitat productivity (Quigley and Harper, 2006), which is eroding our ability to adequately conserve SAR. As we see it, DFO should manage habitat better to help protect and recover SAR.

Routine projects permitted to proceed via Letters of Advice and other projects managed under Codes of Practice or Prescribed Works are causing harm to fish and fish habitat but are not being compensated for. The OFAH requested DFO consider implementing a fee-in-lieu framework for proponents and, though not ideal, would at least provide some level of compensation; that said, the strategy was deemed to be out-of-scope and was rejected by DFO. How can we expect to overcome losses in biodiversity and ongoing declines of SAR when proponents are not being made to pay for damage they cause? Moreover, DFO needs more funding and resources to invest in SAR recovery which can be achieved by implementing fees-in-lieu.

Stringent project oversight

Population increase, climate change, and other environmental stressors will continue to put pressure on our natural resources. Therefore, policies need to be strengthened to ensure the sustainability and ongoing productivity of our fisheries. Ecological thresholds and triggers need to be established and proponent activities need to be tracked more closely. Auditing and enforcement of proponents should be prioritized by actively carrying out more performance reviews, conducting routine and random inspections and follow-ups, along with appropriate checks, balances, and consequences in place. Making enhancements to the oversight and management of projects in this way will result in more resilient aquatic habitats across Canada and more sustainable ecological outcomes for SAR.

Additional considerations for multi-species approaches

There are numerous examples of multi-species and ecosystem-based approaches that have been or are being used for aquatic SAR. Outlined below are some key considerations and guiding principles we identified in a jurisdictional scan of various journal articles and approaches used by other agencies that can be incorporated into Canada’s own framework to improve the way aquatic SAR are conserved and recovered:

- Conserve large, contiguous networks of habitat, and biodiversity. The coverage and scope of which should be very expansive in terms of the number of species umbrellaed, the variety of habitats included, and the total surface area to be conserved. Also vital to the effectiveness of the approach is working across multiple jurisdictions and allowing for cost-sharing between agencies.
- DFO should identify waterbodies with multiple SAR and leverage and designate these places using special designations such as “Key Biodiversity Areas” or other comparable designations [i.e., National Marine Protected Areas, Ecologically Significant Areas (ESAs)].
  - We caution DFO about the unintended consequences of protections that lead to a “hands-off” approach and excludes important stakeholders from the process of conserving and recovering SAR. Informal strategies so everyone can participate are important to consider including via citizen science.
  - Special designations will require some amount of formal scientific assessment. However, we don’t want this to stall progress on establishing designations either (i.e., “paralysis by analysis”) and emphasize the importance of striking a balance between data needs with delivering on-the-ground conservation actions in a timely manner.
- The “portfolio effect” helps in the understanding of how species and ecosystems achieve stability in their dynamics despite an unstable environment. Moving forward, this concept will be important to integrate into conservation planning for aquatic SAR by helping maintain sufficient options, variation, diversity, and resiliency for species and ecosystems (i.e., increasing habitat heterogeneity and availability).

- In some cases, a triage approach may be required by assessing the costs, benefits, and likelihood of success of conservation actions. This will require the prioritization of the allocation of limited resources to maximize conservation returns relative to conservation goals with a constrained budget.
- The hotspot approach in conservation mainly focuses on qualitative estimates of species richness and endemism but there are some identifiable shortfalls to this system. It is primarily geared towards terrestrial ecosystems and ignores the ecological value and ecosystem services provided by “cold spots” (i.e., depauperate regions). For example, by considering global hotspots, Canada would never be included due to low species richness in comparison to other regions.
- Communicating and engaging with local communities, stakeholders, and Indigenous groups to gather on-the-ground experience and knowledge will be a critical component to the multi-species approach (i.e., getting information from those who are affected by changes as they often have insight that researchers wouldn’t necessarily be able to obtain).
- Making improvements to the assessment process carried out by COSEWIC and its subcommittees especially when decisions don’t make sense for the ecology of species with unique life histories and genetic traits. Revise internal policies so that they more appropriately characterize the conservation status of freshwater species.
  - Designations are not always appropriate and, when deemed so through research, alternative methods should be explored for managing these populations.

Closing remarks

The OFAH fully endorses multi-species and ecosystem-based approaches to improve the way aquatic SAR are recovered. However, the linchpin to a successful framework will first involve providing better habitat protection across Canada by enhancing the oversight and management of proponent-led projects and addressing detrimental and cumulative effects. Resourcing and staffing are severely lacking. Funding needs to be redirected and redistributed towards species that can be recovered and threats that can be reduced and/or eliminated. Proponents should be held more accountable by establishing a fee-in-lieu program that could be invested back into SAR. Applying these strategies along with thoughtful consideration of the additional multi-species strategies we outlined will move yardsticks for imperiled species. We appreciate the ongoing consultation and look forward to further developments on the Framework for Aquatic Species at Risk Conservation.

Yours in Conservation,



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References

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