

ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Subject: Draft Fisheries Management Zone 15 Management Plan (ERO number: 019-5715)

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. Since 2017, the OFAH has been an active member of the Advisory Council for Fisheries Management Zone (FMZ) 15 and deeply values the collaborative fisheries management planning process we have in Ontario. There are proposals in the draft fisheries management plan (FMP) we support and other regulation options for coldwater sportfish that anglers will not find acceptable. The OFAH acknowledges the need for creating resilient fish communities as the climate changes and anthropogenic stressors become an even greater threat. However, we could do more for the ecological integrity of our fisheries by making improvements to provincial land use policies and having better commitments to fish and fish habitat protections at the federal level prior to anglers being placed on the chopping block.

Muskellunge

The OFAH is supportive of the proposal to have no zone-wide regulation change for Muskellunge at this time, with a caveat that the Ministry of Natural Resources and Forestry (MNRF) commit to re-evaluating the current approach for managing Muskellunge at the provincial level. In the early 2000s, prior to the Ecological Framework for Recreational Fisheries Management (EFFM), two size-based regulations were used for managing Muskellunge including a minimum reproductive size (MRS) standard of 91 cm and various one-off minimum size length (MSL) exceptions. We feel there is value in seeking public feedback on fully transitioning to a framework based on growth potential (i.e., changing from MRS to the lowest observed growth potential amongst Muskellunge populations), meaning, a potential zone-wide regulation change for Muskellunge in FMZ 15 and in other zones. Many additional considerations will be needed to assess the overall impact of this approach; as such, FMZ advisory councils (where Muskellunge populations exist) will be instrumental in the process and should be consulted and engaged accordingly.

Walleye

The Fisheries Management Support System (FMSS) models indicate the current one-over maximum size limit of 46 cm is unsustainable. While there are data limitations with Broad-scale Monitoring (BsM), evidence strongly suggests biomass and mortality concerns for Walleye populations in FMZ 15. As such, the OFAH supports replacing the current one-over regulation with a harvestable slot of 40-50 cm while maintaining the current catch limit and season. Generally, the models indicate this will perform much better than the current regulations while still allowing for sustainable harvest. Alternatively, further consideration should be given to a harvestable slot of 35-50 cm. The modelling results have shown this option performs quite well, especially in above average and high productivity Walleye lakes, and would also provide additional opportunities for harvest.

With limited data to suggest otherwise, the OFAH disagrees with Exception 1 (reduced daily limits for the subset of lakes in Pembroke District). The models indicate there isn't a significant impact in changing the catch limit of 4(S) and 2(C) unless it is drastically reduced to 1 fish. Therefore, we are uncertain of the rationale being used to justify decreasing the catch limit for the subset of lakes in Pembroke District to 2(S) and 1(C). If these lakes perform similarly to the proposed zone-wide regulation, then we don't see a conservation need to reduce the catch limit.

The OFAH hasn't seen modelling results for a harvestable slot of 40-55 cm, so we are conflicted about the proposal for Muskoka Lake outlined in Exception 2. We recognize this approach will lead to additional opportunities and will be perceived favourably by anglers but what evidence is being used to ensure measurable ecological gains will occur? Though the 35-50 cm harvestable slot has been shown to perform quite well, on the other hand, the Ministry states harvest slot sizes greater than 10 cm have generally not led to increases in Walleye populations in previous simulations. If this is the case for the 40-55 cm slot, anglers may initially be content, but in the long run these regulatory changes may result in an underperforming fishery. As such, greater consideration should be given to including Lake Muskoka in the zone-wide regulation.

Panfish

The OFAH agrees with staying the course for the seasons and catch limits for sunfish and Yellow Perch; however, we are not in favour of maintaining status quo for the Black Crappie regulation in FMZ 15. As the MNRF suggests, panfish are an underutilized resource, and Black Crappie are prolific breeders, expected to be climate change "winners," that pose a threat to native fish communities (i.e., Walleye and trout populations). Considering one of the management actions outlined in this proposal is to encourage the harvest of panfish where there is conflict between multi-species objectives, the OFAH recommends that the MNRF increase the catch limit for Black Crappie to align with sunfish and Yellow Perch at 50(S) and 25(C). Streamlining the regulations in this way was supported and rationalized by the advisory council for multiple reasons, but the Ministry chose to ignore the recommendation as they felt the catch limit wouldn't align with other adjacent FMZs and would require an amendment to the *Ontario Fishery Regulations*. These reasons alone should not be used as justification for avoiding a regulation change. In fact, there could also be an opportunity to increase the possession limits of panfish species to divert angling pressure away from sensitive fisheries and help mitigate the long-term outlook and impact expanding panfish populations will have on more vulnerable sportfish.

Lake Whitefish

We are unconvinced that the best option for Lake Whitefish is to drastically decrease the catch limit by nearly seventy percent to the preferred option of 4(S) and 2(C), especially when the zone-wide effect will result in a "minimal reduction of harvest." Moreover, the OFAH cannot support the MNRF's reasoning for the significant change to the catch limit, wherein the underlying belief is this will help recognize and "raise the social value of Lake Whitefish as a sport fish." We would like to remind the Ministry that Lake Whitefish have long been highly prized by recreational anglers, commercial fishers, and Indigenous peoples, and remain one of the most targeted fish species in some inland fisheries (OMNR, 2002); this is no different in FMZ 15. The OFAH recommends implementing the catch limit provided in Option 3 instead (i.e., 6(S) and 3(C)), coupled with focusing efforts, staffing, and resources towards the few waterbodies where harvest is a greater concern.

As a first step, the MNRF should explore a pilot program for reducing catch limits on a small number of waterbodies, where angling effort and harvest of whitefish is largely focused (e.g., Lake Bernard, Lake of Bays, Twelve Mile Lake, Haliburton Lake, etc.), in addition to conducting targeted monitoring and assessment (e.g., additional creel surveys). Although whitefish are caught in BsM gear, they are not a target species and whitefish dominant lakes are not specifically monitored. This approach will bridge knowledge gaps on population declines and low recruitment in some fisheries while improving the overall understanding of the performance of the catch limit reduction prior to making sweeping zone-wide changes. Considering the presence of aquatic invasive species (AIS) on most of these waterbodies (the primary threat to whitefish), they would be great candidates for determining limiting factors for whitefish and could be used to help guide fisheries management decisions and best strategies for conserving them elsewhere in the zone and into the future.

We support the management action to distribute educational materials on impacts of introduced species but for decades it has been unlawful to transport live fish (other than baitfish) overland and to stock fish without the authority of a licence. As such, Enforcement Branch should prioritize these rules and the Ministry should follow through with their proposal to increase set fines for certain recreational (and commercial) fishery offences. The current fines have not been updated or reviewed since the *Contraventions Regulations* were enacted in 1996 and they don't reflect the current values and environmental risks to fisheries in Ontario. Moreover, at this time, other comparable rules in the *Ontario Fishery Regulations* (e.g., bait bucket dumping, transport and release of invasive species) aren't ticketable offences. Making more offences ticketable and increasing set fines will enhance enforcement of the fishery rules, reduce barriers for officers in the field, will send a clear message to lawbreakers, as well as provide greater conservation of our fisheries resources.

It is proposed that the practice of dip-netting for Lake Whitefish (day or night) and Cisco (at night for the purposes of consumption) be eliminated in the zone; however, how will enforcement differentiate from Cisco being taken by dip-net for use as bait?

Species at Risk

On January 26, 2022, Lake Opeongo small- and large-bodied forms of Lake Whitefish were designated as *Threatened* under the *Endangered Species Act*. The species and their habitats became provincially protected and fishing for Lake Whitefish is now prohibited on Lake Opeongo. More recently, Fisheries and Oceans Canada initiated public consultation on whether to list the same species pair as *Threatened* under the federal *Species at Risk Act*. In the wake of these proceedings, it would be a major misstep to exclude the small- and large-bodied forms of whitefish from, at the very least, the Background Information document for the zone (i.e., where other relevant species at risk (SAR) are elaborated on). The FMP for FMZ 15 doesn't include Algonquin Provincial Park but it will be important to be proactive in planning for potential future SAR listings of Lake Whitefish forms and associated management considerations that will be needed in the zone.

Our primary concerns with special protections of Lake Whitefish populations have to do with possible cascading effects these designations could have on the many other whitefish populations that exist in FMZ 15 and beyond. This could also lead to similar listings for other fish species that exhibit variation below the species level; in particular, valuable sportfish like Lake Trout and Brook Trout which both display different forms or ecotypes within Ontario. Conservation efforts below the species level pose significant challenges to fisheries managers and could potentially open up innumerable protections. A relevant example in FMZ 15 where dwarf forms of Lake Whitefish likely exist and future SAR designations could apply is Ayle Lake where fish are considerably smaller, with an asymptotic size of only about 350 mm. Considering the 114 Lake Whitefish lakes in FMZ 15 identified in the 2003 Atlas (OMNR, 2003), how many of these fisheries could potentially contain unique forms of whitefish as well?

Northern Pike

The OFAH supports maintaining the current regulation for Northern Pike at this time, so long as the Ministry makes a commitment to improving the available dataset to provide more reliable status information on pike populations in FMZ 15. Because of their continued expansion across the zone and the profound negative ecological impact they can have outside of their native distribution, keeping a pulse on pike fisheries is critical to the conservation of other fish communities. Pike sometimes carry a parasite that can be transmitted to whitefish, take away prey species from other top predators (e.g., Lake Trout), and can disrupt entire aquatic ecosystems (Strickland et al. 2021). For these reasons, we believe an additional management action for Northern Pike, where appropriate/feasible, should consider removal efforts at the individual lake-level. Combined with this strategy, and like the proposal for bass, we recommend testing a pike mitigation pilot project by applying a year-round open season on a subset of stocked trout lakes to study the potential to reverse the impacts of pike on these fisheries through the liberal regulation of pike while maintaining the current catch limit (i.e., 6(S) and 2(C)).

Smallmouth and Largemouth Bass

The OFAH is in favour of an earlier start date for Smallmouth and Largemouth Bass on the 3rd Saturday in June and extending the season to December 15th while maintaining the current catch limit of 6(S) and 2(C). We cautiously support the year-round open season proposal on a subset of stocked Brook Trout and Lake Trout lakes as part of the bass mitigation pilot project. One concern we have is the overcompensatory response Smallmouth Bass have shown when similar eradication attempts have been made which resulted in an increase in population abundance of immature individuals (Zipkin et al. 2008). Therefore, we feel it necessary to conduct active lake reclamation via bass removal on these waterbodies in combination with the proposed pilot project. Similar methodologies are being considered in a provincial park and can be more broadly applied to zone 15. We also request that adequate baseline information is gathered on these waterbodies beforehand and routine monitoring and assessment is completed to evaluate the performance of the research study along with detailed reporting and follow-up with the advisory council on the backend.

Brook Trout

The OFAH has serious concerns with the zone-wide proposal to eliminate winter fishing for Brook Trout and begin the open season on the 4th Saturday in April as well as reduce the catch limit to 2(S) and 1(C). In the absence of adequate monitoring and modelling for the zone, the Ministry hasn't made a strong enough argument as to why Brook Trout are especially vulnerable during the winter months. It is important to the OFAH and resource-users to clearly demonstrate the evidence driving this management decision or the Ministry will continue to face significant pushback. In principle, the OFAH could support the proposal but, in the absence high-level direction, the MNRF is putting the cart before the horse at the expense of Brook Trout and the fisheries that support them. Alternatively, instead of eliminating winter fishing zone-wide, the Ministry could narrow the approach to only include prime natural lakes. Provided other factors remain static, Brook Trout populations are relatively resistant to harvest (MNRF, 2022); therefore, what evidence-based rationale is the Ministry using to justify the decreased catch limit?

One of the proposed management actions for Brook Trout is to “*prohibit the use of live baitfish while fishing for Brook Trout in natural lakes that have not been impacted by introduced species*”; however, in order to be effective, this approach must also prohibit the possession of live baitfish, not simply the use. We also question the enforceability of several of the proposed regulations. For example, prohibiting the use and possession of live baitfish in prime natural lakes will require increased effort, resources, and funding for enforcement as on-water and on-ice patrols will be required, and regulations will change from lake to lake. Eliminating winter fishing will require officers to determine the lake of origin of a fish, if there are open stocked waterbodies, or other open lakes on the landscape. Lastly, outside the proposed season, how will enforcement differentiate between unscrupulous behaviours (i.e., out of season fishing for Brook Trout) with claims of fishing for other species? The proposed regulations will create more investigative complexity and higher demand; therefore, unless the Ministry intends to significantly enhance enforcement in FMZ 15, these proposals will likely fall short.

The first step to the conservation of Brook Trout should involve the development of a *Provincial Brook Trout Management Strategy*: a priority for the OFAH. In fact, prior to the FMZ 15 Advisory Council, a similar initiative was kickstarted by the Ministry. Workshops were held and a background document was created that was to be consulted on, the intention of which was to develop a provincial plan and/or policies for Brook Trout to better conserve and manage them. Despite the MNRF acknowledging that the success and persistence of Brook Trout in Ontario is dependent on developing policies and mitigation measures (MNRF, 2017), this concept has fallen by the wayside. Outcomes could have provided strategic guidance for Brook Trout in FMZ 15 and in other zones to help reverse ongoing declines and extirpations, improve our understanding on the status of Brook Trout, and explore management actions in the face of a changing climate.

Population characteristics are not well understood at the zone-level, the implementation of previous plans was inconsistent and incomplete, there are short-term and long-term benchmarks and targets that are undetermined, and information on stream-dwelling Brook Trout is severely lacking. A *Provincial Brook Trout Management Strategy* could help overcome these challenges and be used to bolster the proposed management actions identified in the FMP by, for example:

- Establishing a broad-scale monitoring program for flowing waters (another OFAH priority).
- Further developing the Aquatic Ecosystem Classification System and its application for the management of Brook Trout.

- Strengthening land use policies and practices and providing greater habitat protections towards Brook Trout fisheries and their watersheds.
- Enhancing sampling methods (i.e., non-lethal) and gathering more data to help inform management decisions.
- Gathering creel data similar to the angler surveys conducted in Algonquin Provincial Park (i.e., fish caught/day, number kept, size kept, target species, etc.). This information carries a lot of value in management planning because it allows managers to gauge angler use of resources and potential public response to changes in catch limits and seasons.

The OFAH is strongly supportive of prioritizing and carrying out eradication methods of introduced species through active removal in candidate Brook Trout waters. On the other hand, we are skeptical of the proposed “Brook Trout fishing only” regulation as this could unnecessarily shine a spotlight on highly sensitive and vulnerable fisheries. The MNR could achieve a similar level of protection without spotlighting the lakes using other special regulations common in the region. The proposed changes come across as half measures at best and don’t get at the root of the underlying problem of the MNR not having an overarching management strategy to ensure the sustainability and ongoing productivity of Brook Trout in Ontario.

Lake Trout

The OFAH fully endorses moving away from the current zone-wide regulation because the model results suggest it is unsustainable and, as a consequence, doesn’t align with the FMZ 15 goal to “conserve natural Lake Trout populations.” We also strongly agree with the proposal to implement minimum size regulations of 40 cm and 50 cm for small- and large-bodied Lake Trout populations, respectively. However, as previously indicated, the ***OFAH urges the Ministry to reconsider the proposals to:*** 1) introduce a zone-wide no winter season on small natural lakes (<500 ha); 2) shorten the duration of the winter season on large natural lakes (>500 ha); 3) reduce the open water season on both small and large natural lakes; and 4) limit anglers to only one line when angling through the ice on large natural lakes.

The additional restrictions are a misguided application of the Precautionary Principle that attempts to build resiliency within populations in the face of a changing climate and other stressors including future human interactions. With that said, the FMSS modelling outputs for percent change in the number of adult Lake Trout under the proposed minimum size regulations using the current season and catch limit (i.e., January 1st to September 30th; 2(S) and 1(C)) are as follows:

Minimum 40 cm at fishing effort of 6.0 hours/ha (zone average):

Medium lakes/small bodied: +219%

Small lakes/small bodied: +430%

Minimum 50 cm at fishing effort of 6.0 hours/ha (zone average):

Medium lakes/large bodied: +25%

Minimum 50 cm at fishing effort of 4.5 hours/ha (large lake average):

Large lakes/large bodied: +10%

These results characterize the general trends for how Lake Trout populations will respond to the implementation of minimum size regulations without additional restrictions. This management strategy would maintain current winter and open water seasons, doesn’t unnecessarily restrict angling opportunities, shows positive effects on angling metrics (i.e., catch per unit effort, harvest), and simultaneously conserves Lake Trout populations. However, the MNR insists on going above and beyond by eliminating angling on the front- and back-ends of the current season, reducing the total number of fishable days by sixty percent (i.e., greater than one hundred and sixty days lost), and limiting fishing to essentially three months on small natural lakes (from June to August).

The OFAH is inclined to agree with the reduction of the season in September. Given that Lake Trout spawn weeks ahead of Brook Trout and are entering their critical energy acquisition period in late summer/early fall, it makes sense to provide them the same window of pressure-less opportunity pre-spawn. This approach would also likely reduce some large egg-bearing females being removed prior to spawning. In 2010, following a similar (but more liberal) regulation change in FMZ 10 (i.e., only 1 > 40 cm, January 1st to Labour Day), Lake Trout abundance, growth, and age structure indicators show signs of improvement with “strong movement towards the target” (MNRF, 2022). Because of these successes, the Ministry along with support from the FMZ 10 Advisory Council are proposing to retain the regulation. This provides some insight into the effectiveness of the minimum size regulations, implementing a season end date on Labour Day, and what we might expect in FMZ 15.

The Ministry’s perspective on Lake Trout doesn’t consider the results of the Survey of Recreational Fishing in Canada in that angling pressure on fish populations appears to be decreasing. In general, there is a downward trend in angler numbers and more anglers are practicing catch-and-release which is helping to “reduce the overall impact of recreational fishing on Canadian fish populations” (Statistic Canada, 2008). These statistics are supported by the Provincial Fish Strategy (2015a), which recognizes that participation in recreational fishing has declined, creating uncertainties around the number of anglers and pressure on fisheries resources. The MNRF assumes angling effort will increase into the future despite creel data, dating back to the 1990s, demonstrating a relatively stable average fishing effort over the past several decades. Looking to the future, we would expect effort to remain consistent with this information or possibly lower.

With new boating rules, restrictions on the harvest, use, and transport of baitfish and leeches, the current complexity of fishing laws, and proposing to further limit opportunities in this way (i.e., no winter fishing, reduced open water season, only one line when angling through the ice), regulation fatigue within Ontario’s angling community is inevitable. The cumulative effects of these stressors combined with the increased cost of living and other socio-economic barriers will negatively impact participation rates, licence sales, and funding that goes into the Special Purpose Account (SPA). The MNRF’s draft Sustainability Strategy for the Fish and Wildlife SPA (2015b) states participation in fishing by Ontarians is declining as indicated by trends in licence sales. What will be the loss in terms of angling interest for Lake Trout, volunteer hours, and stewardship towards the species and its habitat now and into the future? Maintaining appreciation while balancing the conservation needs of Lake Trout creates a desire to conserve the species. Winter fishing also facilitates access for anglers who may not otherwise have the means or equipment required to fish for Lake Trout during the open water season (e.g., boat, trailer, downriggers, depth finders, etc.).

The proposed management approaches weren’t adequately vetted through the council process, members were divided on the preferred management approaches for Lake Trout, and most did not support the proposals for additional winter prohibitions (e.g., only one line when angling through the ice, baitfish ban during winter). Ignoring the uncertainty of the council, inconclusive voting, and lack of support for additional winter restrictions but moving forward with the Ministry’s preferred option undermines the purpose and intent of having an advisory council and also makes us concerned that the information we share here will not be duly considered. Of the proposed regulation options, the only one we hesitantly support is the alternate angling regulation Option 2 (presented in Table 4.9).

Fish stocking strategy

The OFAH is pleased to see a fish stocking strategy incorporated into the FMP. Considering the restrictive proposals for the coldwater fish community, the Ministry will have to rely more heavily on enhancements to the stocking program to make up for losses in angling opportunities across the zone. With respect to the identified actions, we encourage the Ministry to conduct further studies into what constitutes a viable, natural, self-sustaining population, and appreciate direct references to further consultation and engagement with the advisory council - an essential component to any successful stocking program. We also support the Ministry exploring opportunities to conduct monitoring and assessment of stocked waterbodies. This could be done as an extension to BsM and could be further supported by targeted creel surveys to help gather feedback on the performance of stocked waterbodies. We would like to see further analysis into speciality stocked fisheries and feel this could be a unique opportunity in the zone that could be operated under a pilot program basis.

The OFAH has been contacted by concerned anglers and community hatcheries regarding the Ministry's position that put-grow-take stocking of Walleye will not occur. That said, it is our understanding that rehabilitation and reintroduction stocking of Walleye will continue to be a component of the stocking strategy. Moving forward, how does the Ministry intend to balance angler expectations/demand with Walleye production at the community hatchery level when the public feels like opportunities are being taken away? The MNRF, volunteers, and other organizations have made significant investments in community hatcheries including those that culture Walleye in FMZ 15. These facilities and the Walleye they produce could be used for diversionary fish stocking (where feasible) by redirecting fishing pressure away from sensitive coldwater fish communities, as well as providing additional angling opportunities when the Ministry is firmly determined to restrict winter fishing for Brook Trout and Lake Trout. We don't want these hatcheries to lose out and believe strongly that they can continue filling a vital role in the stocking of Walleye in locally important fisheries in FMZ 15.

At the provincial level, there is a need to align stocking efforts with local fisheries management needs and provide better guidance with overarching policies to establish inland FMZ stocking plans. The intent would be to have an operational plan that could be broadly applicable across FMZs. This concept could build off some of the information provided in the FMP for FMZ 15 including the outlined goals and objectives, strategies, and action items. FMZ-level stocking plans would benefit by having updates made to policies and guidelines that are decades old and pre-date EFFM including the General Policy for Stocking Fish in Ontario (1982) and Guidelines for Stocking Fish in Inland Waters of Ontario (2002). Creating a 'one-stop' stocking strategy will simplify the existing documents, provide consistent decision-making and direction, and will help establish a process that stakeholders can understand; moreover, advisory councils can be used as a platform for additional feedback, input, etc. A similar approach has been successful across various Great Lakes strategies, including the Stocking Strategy for the Canadian Waters of Lake Ontario (2015).

Closing remarks

With some fine-tuning and additional recommendations, we generally support the preferred regulation options for Walleye, Smallmouth and Largemouth Bass, Muskellunge, Northern Pike, and panfish; however, we oppose the regulation proposals for Lake Whitefish, Brook Trout, and Lake Trout. Whitefish populations are described by the MNRF as being stable across the zone, yet the Ministry wants to significantly restrict anglers instead of addressing the primary threat to whitefish (AIS such as spiny waterflea and Rainbow Smelt). Ontario needs a strategy and better guidance for how to manage Brook Trout now and into the future. Without an overarching provincial plan in place, one-off regulation exceptions for Brook Trout will not be sufficient.

Lastly, imposing intensive angler restrictions for Lake Trout, while models indicate that a less restrictive approach (i.e., size restrictions) would yield positive results under the current season, is a serious example of overregulation. Making incremental changes prior to throwing these largescale changes at anglers would be advisable in order to aid in their understanding of the performance of the regulation change (i.e., what works and what doesn't).

The FMP is meant to support fisheries sustainability within FMZ 15 by setting out various goal statements and objectives for the conservation of fisheries and aquatic ecosystems, as well as seeking ways to enhance public education and promote socio-economic benefits of fishing. Although we understand the MNRF is looking to regulate and restrict anglers in hopes of creating more resilient fish communities, all of the proposals outlined in the FMP are negated by bad provincial and federal policies.

With Ontario's "open for business" platform, including plans to gut conservation authorities and reduce financial burdens on developers, our capacity to conserve aquatic ecosystems is currently at risk. At the same time, Fisheries and Oceans Canada is allowing projects that cause harm to fish habitat to occur through Letters of Advice and managing other projects under Codes of Practice and Prescribed Works. Nationwide, ecological losses are going unchecked and unaccounted for and, despite now being recognized under the *Fisheries Act*, cumulative effects aren't being given adequate attention, but anglers are on the chopping block.

Winter and early spring fishing for coldwater species like Lake Whitefish, Brook Trout, and Lake Trout, is a time-honoured cultural tradition for Ontarians. The Ministry is looking to take these opportunities away without fully evaluating and appreciating all of the options at its disposal at the expense of the angling community. There is also potential for diverting angling pressure away and towards neighbouring FMZs which could unintentionally impact these fisheries and their management goals and objectives. We hope the alternative recommendations we put forward here provide better direction for the future management of fisheries in FMZ 15 and beyond. Thank you for your time and consideration of our comments.

Yours in Conservation,



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