

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 420FMP/452

January 9, 2024

Honourable Graydon Smith
Minister of Natural Resources and Forestry
99 Wellesley Street West, Whitney Block
Toronto, Ontario
M7A 1W3

Dear Minister Smith:

Subject: Strategies for the Fisheries Management Zone 15 Fisheries Management Plan

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 are reaching out to the Ministry of Natural Resources and Forestry (MNRF) to reiterate our perspective on the Fisheries Management Plan (FMP) for Fisheries Management Zone (FMZ) 15, including aspects that can be implemented immediately and some that should be reconsidered.

Walleye

Monitoring and assessment data and modelling results indicate that the current one-over 46 cm rule is unsustainable for Walleye populations in zone 15. Similar trends with the one-over rule have also been observed in Walleye populations in multiple other FMZs and provincially significant inland fisheries throughout Ontario. For this reason, the OFAH believes it is absolutely necessary to implement the proposed 40-50 cm harvestable slot to conserve Walleye in FMZ 15, as it should provide greater protection to mature spawning individuals and improve the overall quality of Walleye fisheries.

Natural Brook Trout lakes

Although we are not inherently opposed to the elimination of winter fishing and reducing catch limits on natural Brook Trout lakes, these actions may be premature in the absence of provincial policies. For better landscape level conservation of Brook Trout, the first step should be to develop a *Provincial Brook Trout Management Plan*, an initiative that was kickstarted by the Ministry in 2016/2017 but never came to fruition, and something the OFAH has been advocating for since 2019.

A management plan of this scale would provide strategic guidance for FMZs and overarching policies for the protection of Brook Trout across Ontario, while avoiding the current ad hoc, zone-by-zone approach. We recognize that prohibiting winter fishing on natural Brook Trout lakes will certainly be a hard pill for Ontario anglers to swallow, but this could be tempered by committing to enhancing artificial fisheries through stand-alone strategic FMZ-level stocking plans: an initiative the OFAH has been calling for since 2018.

Natural Lake Trout lakes

It is clear from the MNRF's data and modelling results, the proposed minimum size regulations of 40 cm and 50 cm on small- and large-bodied populations of Lake Trout, respectively, will help conserve this valuable sportfish now and into the future. As a long-lived, slow growing fish species with low recruitment and replacement rates, Lake Trout are vulnerable to overexploitation and require attentive management.

However, some of the proposed changes may be unnecessarily restrictive. It is not apparent to the OFAH that prohibiting winter fishing on small lakes, implementing a one-line only rule during the winter on large lakes, shortening the ice fishing season, and delaying open water angling to the 3rd Saturday in May are all necessary changes when considered alongside the aforementioned size restrictions. Moreover, with multiple rules being proposed at once, one of the challenges is determining what, if anything, has had the desired effect.

Beginning the open water season on the 3rd Saturday in May will have the unintended consequence of forcing Algonquin Provincial Park to move their Lake Trout opener to the same date to avoid an influx of angling pressure into the park during the early season. It's very disconcerting that greater consideration wasn't given to aligning the Lake Trout season in zone 15 with that of Algonquin Provincial Park (i.e., 4th Saturday in April); however, this wasn't even an option for the public and council to comment on.

We have serious concerns about the proposed cancellation of winter fishing on small natural Lake Trout lakes and the potential impacts on large lakes. This management action will likely correspond to a significant amount of angling effort directed towards large lakes during a restricted window: a race to the bottom to make up for lost angling opportunity. OFAH's Fisheries Advisory Committee is also concerned about how these restrictions could result in spillover to neighbouring zones and the impacts on these fisheries as well.

Considering the FMZ 15 Advisory Council was completely divided on the proposal and the council and public were provided a limited number of options to vote on, it should come as no surprise that the angling community is up in arms about these changes. We are urging decision-makers to consider the following approaches to managing Lake Trout in FMZ 15:

1. Implement the proposed minimum size regulations on small- and large-bodied populations of Lake Trout.
2. Allow winter fishing on small natural Lake Trout lakes.
3. Remove the shortened winter fishing season and permit angling from January 1st to the 3rd Sunday in March on both small and large natural Lake Trout lakes.
 - a. *Alternative: allow winter fishing on small natural Lake Trout lakes with a shortened season (same as the proposal for large lakes - Saturday before Family Day to 3rd Sunday in March).*
4. Allow the standard two-lines while ice fishing.
5. Move forward with the season closure after Labour Day.
6. Change the timing of the open water season to begin on the 4th Saturday in April (same as Brook Trout in FMZ 15 and "trout opener" in Algonquin Provincial Park).

Closing remarks

We have been disappointed by the MNRF's unwillingness to find a reasonable, sustainable compromise on this issue thus far. The OFAH has been very vocal about our opposition to some of the Lake Trout proposals during FMZ advisory council sessions and in our official feedback, with little to show for it. It is important to note that, with these overly restrictive regulations, much of the great, forward-thinking work the council and Ministry has done is being overshadowed by frustration within the angling community.

Our intention here is in no way to push the limits of sustainability. We routinely advocate for tighter restrictions on fisheries all across Ontario, with recent examples including support for more conservative measures for Walleye in Lake of the Woods and backing of a number of management actions in FMZ 10. The OFAH strongly agrees with several of the proposed changes for FMZ 15 as well but simply ask for a more balanced approach that does not impose overly restrictive regulations.

We look forward to further discussing the recommendations brought forward in this letter for FMZ 15 and other strategies and opportunities to improve the enforcement of size-based regulations in Ontario at your earliest convenience. If you have any questions or concerns, please do not hesitate to contact me, or OFAH Fisheries Biologist Adam Weir at adam_weir@ofah.org or by phone at 705-740-3251.

Yours in Conservation,



Mark Ryckman
Manager of Policy

cc: David Hintz, MNRF Manager, Fisheries Section
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