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**OFAH** Ontario Federation  
of Anglers & Hunters

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Director, Governance, Listing and Emerging Priorities  
Species at Risk Program  
Fisheries, Oceans and the Canadian Coast Guard  
200 Kent St - 10th floor  
Ottawa, Ontario  
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RE: American Eel - Consultation check-in on listing under the Species at Risk Act

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wild-life conservation-based organization, representing 100,000 members, subscribers and supporters, and 720 member clubs. We would like to reaffirm our position on the American Eel and the need for its immediate listing as *Threatened* under Schedule 1 of the *Species at Risk Act* (SARA).

Among Canada's many imperiled species, the American Eel may be the most desperately in need of SARA designation due to the extent of its decline and its unique ecological and cultural roles. As a species with an extensive native range and far-reaching migratory behaviours, eels require a much more thorough, holistic approach to recovery than is possible when managed by individual provinces. As evidenced in the upper St. Lawrence River basin alone, eel numbers have been depleted by ninety-nine percent since the 1980s. Although the OFAH recognizes that extirpations and serious population declines have been more prominent in some areas compared to others (e.g., Ontario, Quebec), existing threats and stressors facing this species are varied and ever growing including ongoing habitat loss, the now skyrocketing elver poaching rate, and risks to ocean productivity and changing ocean currents posed by climate change. The cumulative effects of these issues place the American Eel at serious risk of further extirpation and possible global extinction, and it is exceedingly unlikely that such a challenge can be solved by following the status quo.

While the *Fisheries Act* contains two cornerstone provisions on the death of fish and harm to fish habitat, we have seen little corresponding, meaningful advancements in the conservation and protection of American Eels. Since the *Fisheries Act* has proven insufficient to reverse ongoing declines of this fish species, it is clear to us that a different approach is necessary. SARA listing would facilitate such a change.

#### Finding solutions

The OFAH acknowledges the complexities of this issue. We appreciate that DFO must consider all the moving parts at play and that the foremost threat to the American Eel, hydroelectric facilities, also plays an important role in Canada. However, the current state of this important species is unacceptable, considering existing legislation meant to protect them, and the OFAH believes that practical solutions do exist.

For example, hydroelectric facilities could be triaged and prioritized based on the immediacy of the threat to American Eel. In this scenario, facilities located further downstream would be strategically onboarded for immediate solutions for upstream passage (i.e., eel ladders) while being retrofitted with eel friendly designs to facilitate downstream passage (i.e., new turbines). After these facilities are addressed, DFO could have the same requirements applied to upstream facilities.

#### Community partnerships and conflict resolution

In February 2024, the OFAH attended a two-day symposium on American Eel conservation alongside Indigenous partners, nongovernment conservation organizations, and several government agencies. Hosted by the Mohawk Council of Akwesasne, the sessions offered a unique opportunity to discuss and collaborate on immediate and longer-term management actions in support of this species.

Some Indigenous communities have made it very clear they are concerned about the impact of listing American Eel under SARA on their traditional/commercial harvest of eels. One possible solution to this concern would be to provide exemptions for commercial harvest under section 83(4) of SARA including outlining this in a recovery strategy. There is an excellent opportunity for improved collaboration, empowering people to address research and knowledge gaps, carry out monitoring and assessment, and become more involved in the overall recovery process.

#### Closing remarks

For over two decades, eels have been assessed and re-assessed, management plans and memorandums have been developed and abandoned, as well as government response statements, listing recommendations, and “check-ins”; but little tangible progress has been made. DFO must take decisive and committed actions to recovering and conserving this species which will also help uphold Canada’s commitment to the Global Biodiversity Framework.

We strongly encourage the government to list the American Eel under SARA, and work towards establishing an advisory committee of Indigenous representatives, industry, government agencies, nongovernment organizations, and other conservation partners. Thank you for the opportunity to reiterate our support for the listing of American Eel. We look forward to the recovery of the species.

Yours in Conservation,



Adam Weir  
Fisheries Biologist

AW/jb

cc: OFAH Board of Directors  
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