



May 21, 2014

Warren Dunlop  
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Ministry of Natural Resources  
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**Re: Conservation Ontario's Comments on the Provincial Fish Strategy for Ontario (EBR # 012-0291)**

Dear Mr. Dunlop:

Thank you for the opportunity to comment on the proposed "Ontario Provincial Fish Strategy: Fish for the Future". Conservation Ontario represents Ontario's 36 Conservation Authorities (CAs), which are local watershed management agencies that deliver services and programs that protect and manage water and other natural resources in partnership with others. The following comments are submitted for your consideration based upon a review by staff from Conservation Ontario and six Conservation Authorities.

Conservation Ontario is pleased that the strategy recognizes that successful fisheries management in Ontario depends on collaboration with partner agencies and stakeholders (including Conservation Authorities). Overall, Conservation Ontario is supportive of the main goals, objectives and tactics that are identified in the strategy. Conservation Ontario is also supportive of the province's use of a landscape-scale, risk-based and adaptive approach to fisheries management. However, Conservation Ontario is concerned that the strategy lacks several elements that should be used to achieve success via these approaches. The following comments are offered as suggestions for enhancing the strategy to strengthen these approaches.

**Integration of the Landscape Scale Approach and Watershed Based Fisheries Management Planning**

While the strategy recognizes that "natural hydrological landscapes, such as watersheds, can provide the basis for appropriate spatial scales of management" the strategy's main emphasis is on the landscape level scale of management via fisheries management zones. In the sections describing past fisheries management planning there is no mention of watershed-based Fisheries Management Plans (FMPs) and the guidance that the province has provided in the past to support this scale of planning.

There is also little discussion in the strategy on how fisheries management relates to provincial planning tools, including the provincial policy statement (PPS). The PPS directs that "Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements". Watershed-based fisheries management plans can play an important role in assisting

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municipalities to meet the requirements outlined in the PPS and the Provincial Fish Strategy would benefit from making this connection.

In a related vein, while the strategy clearly identifies proactive tactics to address climate change and invasive species, fewer tactics are aimed at addressing the threats posed by land use change and urbanization which is one of the greatest risks to fisheries in Southern Ontario. This threat is also addressed via watershed based fisheries management planning.

It is therefore strongly recommended that the province place greater emphasis on integrating watershed based management of fish into the strategy. In particular it is recommended that this integration could be achieved by:

- Outlining how the various scales of fisheries management planning are nested and integrated in Ontario. This should include the addition of a diagram or chart in Section 7 including roles, responsibilities and management scales as a complement to Figure 2. For example, the strategy lacks acknowledgment for the important role that municipalities play in financially supporting the preparation and implementation of watershed based FMPs. This role should be acknowledged here.
- Objective 1.4, First tactic *“Assess and set priorities for rehabilitation or restoration of degraded native fish populations”*. Addition of text to acknowledge that part of the assessment process should include regard for existing priority rehabilitation and restoration targets set by Conservation Authorities through watershed plans, watershed-based FMPs or other local programs/initiatives.
- Objective 1.6: Second Tactic *“Explore opportunities to work with others to develop integrated watershed and resource management plans that include aquatic ecosystem and sustainable fisheries objectives”*. Text should be revised to recognize that in many cases Conservation Authorities have already developed these types of plans. Therefore there is also need for the plans to receive continued support from MNR for implementation.
- Objective 1.6: Third tactic *“Contribute to initiatives that advance understanding and develop science-based decision making tools that will inform policies and strategies to evaluate and mitigate cumulative effects.”* It has been argued that more can be learned about past and existing cumulative effects of land use and water management at a watershed scale than with a focus on the broader landscape level only. Therefore it is suggested that MNR consider referencing support for watershed and sub-watershed planning and implementation (as per tactic 2) as one example of an initiative to evaluate and mitigate cumulative effects. The result would be increased consistency between the advice provided in the Fish Strategy and the requirements of the Provincial Policy Statement.
- *MNR’s Roles and Responsibilities for Fisheries Management (pages 9-10)*: Addition of text to reference MNR’s work with Conservation Authorities to develop watershed based FMPs and to provide advice to municipalities about fish habitat protection. As well, could include reference to MNR’s responsibility for other related pieces of legislation including the *Public Lands Act*, *Lakes and Rivers Improvement Act* and *Endangered Species Act*.
- Objective 5.2 - *Develop Effective Partnerships-Second tactic*: The text should be revised to acknowledge that fisheries management objectives developed by other agencies and partners at different scales (such as CA involvement in watershed based fisheries management plans) should also be considered when MNR is developing provincial or landscape level fisheries objectives.

### *Fisheries Management Zones*

The strategy places emphasis on the importance of Fisheries Management Zone (FMZ) planning as the primary means to implement the landscape scale approach of fisheries management. On page 16 of the strategy it is indicated that as part of the FMZ planning process “Advisory Councils and Committees representing the general public, key stakeholders, and Aboriginal communities provide advice on objective setting, management actions and monitoring, assessment and reporting.” In the past the Ministry of Natural Resources has indicated that partner agencies such as Conservation Authorities would be consulted to provide input into the FMZ Council processes however seats on the Councils would be reserved for others. Based upon the comments received from Conservation Authorities on implementation of the FMZ concept, in practice, there has been inconsistent consultation and engagement with Conservation Authorities as part of the Fisheries Management Zone planning processes. Conservation Authorities are intimately involved in watershed level planning and fisheries management. Therefore, they have valuable knowledge and expertise that should be integrated as part of the zone planning process through including Conservation Authority staff as part of these Councils where regionally appropriate.

### *Objective 4.1 –Monitoring*

Conservation Ontario is strongly supportive of Tactic 6: “Establish strategic partnerships with partner agencies, Aboriginal communities, the tourism industry and other stakeholders to monitor and report on Ontario’s fisheries resources.” However it is suggested that this be modified so that in addition to establishing new strategic partnerships, the province acknowledge the importance of supporting existing partnerships. In particular, a tactic should be added to acknowledge continued provincial support for strategic partnerships with Conservation Authorities for gathering, assessing and understanding the Province’s fishery resources. Many Conservation Authorities undertake regular monitoring programs to better characterize the aquatic resources within their watersheds. Conservation Authorities contribute to information gathering regarding the range of species (including species at risk and invasive species) as well as collect fish specimens for provincial programs such as “The Guide to Eating Ontario Sport Fish. OSAP (Ontario Stream Assessment Protocol) is the standard used by most Authority aquatic monitoring programs and this data is useful for broad-scale management. The province plays a key leadership role in establishing and supporting protocols such as OSAP to ensure that a standardized monitoring and reporting approach is used.

### *Objective 4.3: Information management*

Conservation Ontario is strongly supportive of the implementation of Tactics 1, 2 and 3 as part of a dedicated plan for the development, management and maintenance of accessible information in provincial aquatic/fisheries databases. The province is also encouraged to include consideration for harmonizing provincial and federal aquatic information databases.

### *Objective 2.1 – Fish harvest*

Tactic 1: The definition for an “intensively managed water body” should be provided. Tactic 3: In addition to recreational fish policies, commercial and Aboriginal fishing policies should be developed.

### **Risk Based Approach**

Overall the strategy is promoting a “risk based” approach directed to the most urgent issues. While this approach is supported in general, care must be taken to ensure that focus is not placed on high risk areas to the detriment of lower risk areas which can eventually become urgent and high risk. For example while monitoring should generally be focused on “targeted” areas as dictated by risk (as per objective 4.1) ecosystem conditions are always changing and risk assessments may be inaccurate.

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Therefore there is still a case for monitoring over wider areas or time frames.

In addition, the concept of vulnerability is not discussed in the strategy. It is important to include clarification on the role of vulnerability in any discussion to determine risk. There are ecological and/or biological mechanisms that make organisms, habitats and/or processes unable to cope with change/stress beyond a certain tolerance or range. Scientific vulnerability assessment supports risk based assessment. This distinction should also be referenced in the strategy. It is suggested that guidance from MNR's Climate Science team be sought for further suggestions on incorporating vulnerability into the risk based approach as they are advancing many vulnerability assessment tools for aquatic species and their habitats across Ontario.

### **Native Fisheries Management**

The strategy appropriately focuses on protecting, maintaining and enhancing native fish species. However there are several related elements that have been omitted and could be included as follows:

#### *Stocking-( page 10 and in Objective 1.2–Aquatic ecosystem structure and function)*

Stocking is referenced however no reference is made to the impact that stocking can have on aquatic ecosystems. This impact should not be ignored and potential issues associated with stocking hatchery fish on top of self-sustaining populations should be communicated.

#### *Objective 1.1- Aquatic ecosystem diversity and connectivity*

In addition to protect and maintain, enhancement should also be a component of diversity and connectivity. It should also be noted that diversity and connectivity, in some cases, may not be an objective (e.g. coldwater systems, barriers to prevent invasive species)

*Objective 1.3 – Protect native fish communities*-It is unclear whether the intention is to develop plans to manage specific fish species or fish communities.

*Naturalized Species* - There should be further consideration given to addressing management of naturalized species throughout the strategy. They are not considered in MNR's vision or Goal 1 statement, nonetheless they can be important self sustaining fisheries.

Thank you once again for providing the opportunity to comment on the proposed "Ontario Provincial Fish Strategy: Fish for the Future". Overall, Conservation Ontario is supportive of the main goals, objectives and tactics that are identified in the strategy and Conservation Authorities look forward to working with the Ministry of Natural Resources to implement actions consistent with this strategic framework. As you work on finalization of this strategy and require further clarification of these suggested additions, please contact me at extension (226).

Sincerely,



Leslie Rich  
Policy and Planning Officer

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