



June 6, 2012

Hon. Keith Ashfield, Minister
Fisheries and Oceans Canada
200 Kent Street
13th Floor, Station 13E228
Ottawa, Ontario K1A 0E6
Canada

RE: Economic Development at All Cost?

Dear Minister Ashfield:

I am writing this letter on behalf of over 300 Canadian fisheries professionals who are members of the Canadian Aquatic Resources Section (CARS) of the American Fisheries Society (AFS) with mutual interest in fisheries and aquatic resources in Canada. The American Fisheries Society (AFS), with a membership of over 9,000 members, is the world's oldest and largest organization dedicated to strengthening the fisheries profession, advancing fisheries science, and conserving fisheries resources. Our membership includes academics, private and public sector professionals and scientists as well as those working in the not-for-profit sector and students. The Section was initiated in 1991 to provide a forum for discussion of Canadian aquatic resource issues and the future of the fisheries profession in Canada.

The Canadian Aquatic Resources Section wishes to express our concern over the many changes to the Federal Fisheries Act and associated policies, which are being undertaken rapidly and that will have long-lasting negative consequences on fish and fish habitat in Canada. Earlier this year, on March 20th, we sent a letter outlining our concerns, and we are still awaiting a response. Although we agree that there is a need to improve the predictability, consistency and timeliness of review processes related to habitat management, we believe that significant changes to Canada's environmental legislation warrant consultation with the Canadian public, as the government is the chief steward of the environment and habitat. Quite simply, these should not be part of the omnibus budget bill and should be debated, revised, and voted upon separately.

We are concerned that the focus for protection is shifting to consider only species which are targeted by recreational, commercial and aboriginal fisheries. We certainly recognize the economic, social, and cultural value of fisheries, but the foundation for fisheries is habitat protection and ecosystem management. The majority of freshwater fish in Canada are not targeted directly by fishers. However, many of these species provide important food resources for economically important species, as well as important ecosystem services such as nutrient cycling. The continued protection of all fish and fish habitat from harmful alteration, damage, or disruption is needed to ensure that Canada's fisheries and aquatic ecosystems remain healthy and productive, as per the Mission Statement of Fisheries and Oceans Canada. Given that water flows downstream, any changes in the upper reaches of watersheds literally trickle down to affect the broader fish community, including many of the economically important species that are targeted by fisheries.

The scientific community has worked for decades to promote freshwater biodiversity and to draw attention to the plight of freshwater fish that are not targeted by fishers, with great success. The Canadian government has supported this work by recognizing and legislating protection for many endangered freshwater, non-game species such as copper redhorse and Nooksack dace. However, the message delivered to the Canadian public via the media by the Harper government is quite clear – fish that are not fished are not of value. It will take many years to rebuild the respect and support for species like channel darter, river redhorse, and bowfin. The

habitat provisions of the Fisheries Act have been the envy of habitat managers and conservation scientists around the globe. Indeed, at a recent international workshop on inland fisheries in Scotland I (Dr. Cooke) was asked to deliver a presentation on what we do well in Canada with respect to freshwater fisheries. I emphasized the focus on habitat protection at all levels – not just for mega-projects but for all fish habitat alterations. Unfortunately, I had to end my presentation by noting that Canada's leadership in that arena is being rapidly eroded as part of this sweeping set of changes to fish habitat protection in Canada.

Also of significant concern is the fact that the flagship Canadian freshwater research facility – the Experimental Lakes Area – will no longer be supported and managed by Fisheries and Oceans Canada. In order to make informed and evidence-based decisions, it is critical to understand how various stressors influence aquatic ecosystems. The pioneering and internationally significant work that has emerged from the Experimental Lakes Area has helped to shape environmental policy in Canada. If current plans remain, the loss of this facility would represent a major setback to evidence-based conservation in Canada not to mention a global signaling to scientists in other countries that Canada is no longer going to be a leader in freshwater science and management.

The Fisheries and Oceans Canada Mission Statement indicates that the goals of economically prosperous fisheries and sustainable aquatic ecosystems shall be met through sound science and forward-looking policy. **We ask, what was the scientific basis for the proposed changes to the *Fisheries Act* and associated policies?**

We are aware of the recent creation of an advisory board related to fish and wildlife issues in Canada but would note that the scientific community has been left out of this process. **Open dialogue is important in the matter of modernizing the language and intent of the Federal Fisheries Act and we seek an opportunity for professional scientific organizations like ourselves, the Canadian Aquatic Resources Section of the American Fisheries Society, to consult on changes the *Fisheries Act* and associated policies.** We would also urge you to consult other professional science-based societies such as The Wildlife Society, The Canadian Society of Zoologists (CSZ), the Canadian Society for Limnologists (SCL), and the Canadian Society of Ecology and Evolution (CSEE).

We have expertise to offer and are able, at your convenience, to provide unbiased science-based consultation of how impacts to 'non-target fish' may impact species targeted by recreational, commercial and aboriginal fisheries. We seek an opportunity to help Fisheries and Oceans Canada to meet its commitment to service excellence, sound science, forward-looking policies and maintaining sustainable aquatic ecosystems. **We look forward to hearing from you to arrange a time to discuss this further.**



Dr. Steven J. Cooke
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and
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cc:
Office of the Prime Minister
Fisheries Critic of the Official Opposition
Leader of the Official Opposition
Leader of the Liberal Party of Canada
Leader of the Green Party of Canada