



Canadian Section of The Wildlife Society

"The mission of the Canadian Section of The Wildlife Society is to foster excellence in wildlife stewardship through science and education among wildlife professionals in Canada"

21 March 2012

The Honourable Keith Ashfield
Minister of Fisheries and Oceans
200 Kent Street
Ottawa, Ontario
K1A 0E6

Dear Minister Ashfield:

The Wildlife Society is a non-profit professional and scientific organization of more than 10,000 wildlife professionals and students from across North America, with more than 500 members in five Provincial Chapters and six Student Chapters at colleges and universities across Canada. Our members are employed by government organizations, non-government organizations, industry, professional consultants and universities. We are committed to a world where humans and wildlife co-exist. Our purpose is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide. Many of these professional biologists and managers are world-renowned experts in conservation and wildlife habitat management, including wetland conservation, fisheries management and endangered species.

As President of the Section, I am writing to you to express the serious concern of the Canadian Section of The Wildlife Society regarding the proposed amendments to the Canadian Fisheries Act that will remove provisions to protect fish habitat, and refocus protection efforts to fish that are, "...economically, culturally or ecologically significant".

Habitat is essential for all living creatures; failing to maintain sufficient fish habitat to support viable populations will result in the loss of those populations. While many species in Canadian lakes, rivers and coastal areas are secure and at little risk of loss, it is our understanding that the proposed changes will reduce the Department of Fisheries and Ocean's ability to protect habitat for those species that may be at risk or in decline.

Further, while it may be relatively straightforward to define a fish as being economically and culturally significant, assessing ecological significance is very difficult. All species in a community occupy a niche, and the loss or significant decline of a species from that community may have unknown effects. These effects may range from minor shifts in the ecology of the system, to large and unexpected shifts, including the potential loss of other species, some of which may be culturally or economically significant. Unfortunately, history has shown that loss of species from an ecosystem often results in long-term wildlife management and environmental problems. For this reason many ecological scientists agree that all species are ecologically important and their collective diversity provides the ecological resilience to guard against such calamities.

The Canadian Section of The Wildlife Society appreciates that the current version of the Canadian Fisheries Act, first drafted in 1867 and amended over the years, is at times ineffective and may create legal circumstances at odds with both conservation objectives and reasonable activities (e.g., prohibitions on draining seasonally flooded farmland that suddenly shifts from “prairie songbird habitat” to “fish habitat”). As a result, it is reasonable to suggest that amendments to the Act may be needed, as they have been in the past. We respectfully submit that removal of habitat protection provisions, however, is an ineffective and perhaps flawed solution to these problems.

As an organization, The Wildlife Society works to ensure that wildlife and their habitats are conserved through management actions that take into careful consideration relevant scientific information. As you go forward with proposed amendments, we encourage you to include input from scientists both within the Department of Fisheries and Oceans, as well as within other organizations. We welcome the opportunity to help provide input as you consider thoughtful and scientifically-based amendments to improve the Fisheries Act

There are a number of relevant publications that you may find useful that we could provide at your request. Should you require any further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Paul R. Krausman". The signature is written in a cursive style with a long horizontal flourish at the end.

Dr. Kathreen Ruckstuhl
President, Canadian Section of The Wildlife
Society

Dr. Paul Krausman, CWB
President, The Wildlife Society