



OFAH FILE: 452
July 29, 2024

Ministry of Natural Resources
Species at Risk Branch - Species at Risk Recovery Section
300 Water Street
North Tower, 5th Floor
Peterborough, Ontario
K9J 3C7

RE: Draft Government Response Statement for Lake Whitefish (Opeongo Lake large- and small-bodied populations).

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 700 member clubs. We appreciate the opportunity to provide comment on the Ministry of the Environment, Conservation and Parks' (MECP) draft Government Response Statement (GRS) to the *Recovery Strategy for the Lake Whitefish - Opeongo Lake large- and small-bodied populations in Ontario*. Although the OFAH does not oppose the strategies outlined in the GRS, we have several additional recommendations.

1. One action item listed in the GRS involves, *"...requiring boaters to take mandatory precautions to remove aquatic organisms and drain water from watercraft and watercraft equipment prior to transporting overland or launching into any waterbody in Ontario."* This is a preexisting legal requirement and, while we recognize that it is beneficial to fisheries across the province, therefore shouldn't be included as a direct action for protecting whitefish in Lake Opeongo.
2. The GRS is limited to only two performance measures. This section would benefit from performance measures for most action items listed in the GRS including a systematic way for evaluating their effectiveness. For example, the performance measure for Action #2 could involve funding/implementing a permanent boat washing station at the Lake Opeongo boat launch. Staff could evaluate the effectiveness of the station by monitoring/tracking seasonal usage and report on the findings at the next review of progress. We also recommend specific performance measures for aquatic invasive species (AIS) like Spiny Water Flea, due to the serious threat they pose to whitefish.

3. MECP is reusing generic, open-ended actions from multiple other GRSs (e.g., “*Educate other agencies and authorities involved in planning and environmental assessment processes on the protection requirements under the ESA*”). The Auditor General of Ontario (2021) states that repeatedly listing the same action is “not an effective substitute for specific actions to improve the status of a particular species.” We recommend MECP provide greater detail and elaboration on exactly how this action will be carried out and achieved for Lake Opeongo whitefish.
4. The actions would benefit by having associated cost estimates in the response statement to ensure fiscal resource allocations are transparent to decision-makers and the public.
5. While the number of regulated species at risk has increased over the years, funding for the Ministry’s Species at Risk Stewardship Program has decreased (Auditor General, 2021). There is a clear need for greater funding towards internal staffing and resourcing as well as financial support for on-the-ground conservation work through the Stewardship Program to ensure each action item is properly addressed/implemented.
6. We are unaware of a standalone, Ministry-led tracking system for assessing the progress of government-supported actions outlined in GRSs and recommend this be developed, implemented and made publicly available.
7. The GRS could be strengthened by removing discretionary language. Limiting actions to, for example, “*encouraging* cleaning of watercraft and gear” and “*may include* the installation or use of mobile watercraft and gear washing stations” does not instill much confidence that whitefish will be adequately protected. A more reasonable alternative would be:

“Require mandatory cleaning of watercraft and gear before accessing Opeongo Lake and nearby waterbodies. This action will include the installation and use of mobile watercraft and gear washing stations at key locations including Opeongo Lake access road. (government led and supported).”
8. The MNR identifies over 2,200 waterbodies where Lake Whitefish occur across the province (MNR, 2022), where other sympatric species pairs could potentially exist. Other species like Brook Trout, Lake Trout, and even Walleye have also been known to display variation below the species level. Providing full protections to different forms of the same species would create an unmanageable number of protections while undermining the recovery of other endemic and/or lower profile species at risk. Considering funding cutbacks, there is a need to triage and prioritize how species at risk are conserved in Ontario.

Closing remarks

Although MECP is making headway with Lake Opeongo whitefish, response statements for American Eel and Lake Sturgeon (Great Lakes - Upper St. Lawrence and Saskatchewan-Nelson River populations) have yet to be finalized, despite both recovery strategies being published over a decade ago and the government going on record stating they will be “completed by December 2023” (Auditor General, 2021; p. 38). We look forward to MECP’s approaches to protecting and recovering small- and large-bodied Lake Opeongo Lake Whitefish, while encouraging the government to follow through on their other commitments.

We hope to collaborate in the future on new opportunities and approaches for improving conservation of species at risk in Ontario.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'A. Weir', with a stylized flourish at the end.

Adam Weir
Fisheries Biologist

AW/jb

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
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