

# Letter Submitted by CSEB to the Federal Minister of Fisheries and Oceans



The Honourable Dominic LeBlanc  
Minister, Fisheries, Oceans and the Canadian Coast Guard  
200 Kent St.  
Station 15N100  
Ottawa ON K1A 0E6  
Email: min@dfo-mpo.gc.ca

July 2, 2018

**Subject: Proposed amendments to *Fisheries Act***

Dear Minister LeBlanc,

On behalf of the Board of Directors of the Canadian Society of Environmental Biologists (CSEB), I would like to acknowledge and congratulate your government for the proposed amendments to the *Fisheries Act*.

As biologists working in all watersheds and the three oceans of Canada, we work for the protection of fish and fish habitat and conservation of species. We believe that the spirit of many of the proposed amendments will benefit freshwater and marine fish, fish habitat, and other wildlife dependent upon these. In particular, the CSEB is supportive of the following amendments:

- Inclusion of all fish species in protection under the Act. This replaces the Commercial, Aboriginal, and Recreational (CRA) species categorization and will remove some uncertainty in conducting environmental assessment as any fish species present will result in a watercourse being unambiguously fish habitat and so subject to the *Fisheries Act*.
- A return to prohibition of activities based upon Harmful Alteration, Disruption or Destruction (HADD) of fish habitat. We believe that this concept is more pragmatically useful as impacts to physical habitat can be more readily and reliably quantified and documented than effects upon the fish themselves. This is a more conservative approach to protection of aquatic and marine systems.
- Enhancing the ability to create long-term, area-based restrictions to fishing activities for purposes of conserving marine diversity (e.g., marine refuges)

In addition to the amendments, our organization is encouraged by your commitment to having strong enforcement capacity and increasing the number of frontline fishery and habitat officers.

We believe that these general amendments are one step in the direction of more effective and efficient environmental protection and restoring the *Fisheries Act* to its former strength in environmental law. We support the spirit of the amendments. The attached brief article, published in our Spring 2018 Bulletin and advocating for the amendments, expands upon our support and perceived need for this legislation.

Sincerely,

Curt Schroeder, B.Sc., M.E.Des. President  
Canadian Society of Environmental Biologists  
c.c.: Board members  
Enc.

## Response to Letter To the Federal Minister of Fisheries and Oceans

Minister of  
Fisheries and Oceans



Ministre des  
Pêches et des Océans

Ottawa, Canada K1A 0E6

OCT 01 2018

Mr. Curt Schroeder  
President  
Canadian Society of Environmental Biologists  
PO Box 962, Station F  
Toronto ON M4Y 2N9

Dear Mr. Schroeder:

I am writing in response to your correspondence of July 2, 2018, addressed to my predecessor, the Honourable Dominic LeBlanc, concerning Bill C-68, *An Act to amend the Fisheries Act and other Acts in consequence*.

I appreciate your feedback, and I have forwarded your comments to Mark Waddell, Director General of Fisheries and Licence Policy, and Nicholas Winfield, Director General of Ecosystems Management, for their due consideration. As you likely know, the bill is currently before the Senate.

Should you have any additional input, I encourage you to send it to either of the following addresses:

[Mark.Waddell@dfo-mpo.gc.ca](mailto:Mark.Waddell@dfo-mpo.gc.ca)

[Nicholas.Winfield@dfo-mpo.gc.ca](mailto:Nicholas.Winfield@dfo-mpo.gc.ca)

Thank you for writing.

Yours sincerely,

A handwritten signature in blue ink that reads 'Jonathan Wilkinson'.

Jonathan Wilkinson, P.C., M.P.  
Minister of Fisheries, Oceans and the Canadian Coast Guard

Canada