

Society of Canadian Limnologists



**SCL**

Société canadienne de limnologie

March 26, 2012

The Right Hon. Stephen Joseph Harper, P.C., M.P.  
Prime Minister of Canada  
Langevin Building  
80 Wellington Street  
Ottawa ON K1A 0A6

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

**Dear Prime Minister Harper,  
cc. Honorable Keith Ashfield, Minister of Fisheries and Oceans**

**Re: Potential amendments to section 35 of the Fisheries Act**

The Society of Canadian Limnologists represents researchers working in the aquatic sciences across Canada. On behalf of the aquatic science community of Canada, we wish to express our deep concern that your government has proposed to alter aquatic habitat protection measures from section 35 of the Fisheries Act. Although we understand that these revisions of the Fisheries Act to protect aquatic habitat may expedite the approval of large economic development projects, it will come at the societal cost of conserving fisheries and water quality. This proposed action concerns us because it not only will make fisheries stocks vulnerable, it will also threaten the food web supporting this important resource for Canadians. Further, it will jeopardize key ecosystem processes that maintain water quality and fish spawning beds in rivers, such as erosion-control and excessive algal growth from terrestrial runoff. To have wording that focuses on the protection of species with 'cultural, economic, and ecological value' is surprising to us, given the emphasis that the Department of Fisheries and Oceans places on ecosystem approaches to fisheries management. The reduction or elimination of habitat protection from the Act therefore seems at odds with a core guiding principle of the Department of Fisheries and Oceans. Research by Canada's own aquatic science community has repeatedly shown that habitat destruction is the principal cause of

declines in aquatic species and diversity. It is therefore impossible to protect aquatic resources without regulating and protecting aquatic habitat.

Historically, Fisheries and Oceans Canada has been an international model in the development of high standards of environmental science and policy. The alteration of habitat protection measures in section 35 of the Fisheries Act will undermine Canada's efforts to maintain its high international standing in environmental policy for water, our most important natural resource. In addition, these changes will ultimately cost the taxpayers of Canada much more to rehabilitate and restore damaged ecosystems and fisheries for future generations than it will to properly protect them. We ask you to reconsider these changes to Canada's Fisheries Act.

As experts in aquatic ecosystems and management, we would gladly provide the government with assistance in this matter.



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