



# The Alberta Fish & Game Association

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Honourable Shannon Phillips  
Minister of Environment and Parks,  
Minister Responsible for the Climate Change Office  
Members of Executive Council  
Executive Branch  
208 Legislature Building  
10800 97 Avenue  
Edmonton, AB T5K 2B6  
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Andre Corbould  
Deputy Minister  
Environment and Parks  
10th Floor, Petroleum Plaza  
9915 108 Street, Edmonton, AB T5K 2G8  
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Travis Ripley  
Executive Director  
Fish and Wildlife Policy Branch  
Environment and Parks  
2nd Floor Forestry Building  
9920 108 Street, Edmonton, AB T5K 2M4  
[travis.ripley@gov.ab.ca](mailto:travis.ripley@gov.ab.ca)

Dear Honorable Shannon Phillips, Mr. Andre Corbould and Mr. Travis Ripley:

The Alberta Fish and Game Association is the largest and oldest conservation organization in Alberta. It represents 25,000 members in 80 clubs spanning the breadth of the province. We appreciate that the Government of Alberta has undertaken a consultation process related to the *Northern Pike and Walleye Management Framework* and the *North-Central Native Trout Recovery Plan*. Both initiatives if implemented as presented by fishery managers will have generational effects on angling in Alberta.

We believe consultation is a fundamental tenant of governance and policy development. The goal must be to address concerns throughout the consultation process that leads to acceptance by the public of the outcome. Consultation to be meaningful must demonstrate that the concerns of

stakeholders have been considered and reflected in the end product. To be effective there is the requirement that consultation begin at the start of a process, not just the end. Throughout the process there must be continual communication as to how concerns are being addressed. Not only have these consultations only occurred at the end of a process, limited alternatives are presented for consideration, accessibility is limited, surveys are not randomized, and outstanding issues identified by the public have not been addressed through the plans.

We have heard many concerns and frustration from our membership and the larger angling community, not only surrounding the consultation process, but the narrow focus of the plans. The plans further expand the already risk adverse philosophy within the department. The fundamental issue is the continued reliance by the Government of Alberta to achieve moving benchmarks and targets based on single fish species population status and dynamics through angling regulation change only. The foundation of sustainable fisheries management must be through a comprehensive program that addresses ecosystem function, balance and health. The overall and long-term consequences of the plans are difficult to comprehend by both fishery managers and the angling community. The needed balance from an environmental, social and economic perspective appears to have been missed.

Despite both increased budgets and manpower for fisheries management over the last 25 years, the status of Alberta fisheries based on the singular focus of manipulating angling regulations including the closure of the commercial fishery has not led to the expected fish population status rebound. This is demonstrated by the increasing number of species that are now considered either at risk, threatened or endangered in the province; reduced geographic range of species; fewer anglers; application of the most restrictive angling regulations in North America, and the continual loss of angling opportunity across the province.

Alberta has a net habitat deficit due to the continual expansion of the human footprint on the landscape. Plans and policy that do not address this habitat issue cannot be supported. Plans must also include the necessary support, resources and funding to achieve habitat restoration, enhancement and protection goals that cross all ministries and levels of government. The Alberta Fish and Game Association will not support either of these plans as they fail to address the multi-factorial reasons that impact fish population status, both real and due to changing benchmarks. We are concerned about transparency and consideration of stakeholder concerns in terms of the long-term goals, objectives and direction of fishery management in Alberta. If the Government of Alberta continues in the current direction with implementation of these plans, it will lead to further lost angling opportunity including greater concentration of angling pressure, which bring additional risk and consequences. Disfranchising the angling community appears to be an objective.

The initiatives provide limited alternatives, heightens the risk adverse management approach, and do not address the multi-factorial issues related to fishery management in Alberta. To spur the necessary conversation, the Alberta Fish and Game Association has developed and provided to its members, others in the angling community and the Government of Alberta a discussion document related to fisheries management in the province. The first component, with a focus on the *North-Central Alberta Native Trout Recovery Plan* was circulated in December of 2017. The second component will be released in January 2018 that will concentrate on the *Northern Pike and Walleye Management Framework*.

We are asking the government of Alberta to put on hold planned changes to angling regulations for 2018 related to these plans. The AFGA is prepared to work with the Government Alberta and other stakeholders to develop the necessary comprehensive plans which must include appropriate resources, manpower and funding that lead to long term aquatic ecosystem function and health that is the foundation of sustainable fishery management.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Doug Butler". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

Mr. Doug Butler  
President  
Alberta Fish and Game Association

cc : AFGA Executive