



*The Alberta Fish and Game Association is your voice in conservation*

January 6, 2022

Honourable Jason Nixon  
Minister of Environment and Parks, House Leader  
Office of the Minister  
323 Legislature Building  
10800 - 97 Avenue  
Edmonton, AB, T5K 2B6  
[aep.minister@gov.ab.ca](mailto:aep.minister@gov.ab.ca)

Dear Minister Nixon,

As we enter 2022, the Alberta Fish and Game Association (AFGA) would like to thank you for your commitment to bring about constructive change in relation to the management of Alberta's fish and wildlife resources. We recognize this was not easily accomplished during the COVID-19 pandemic. Thank you for your continuing resolve to increase opportunities for anglers and hunters in our province.

Since becoming Minister you have championed change that has long been advocated by the AFGA. The direction reflects the necessary balance that must consider the environment, economics, and society. At times, our organization may not support a given direction, but this is to be expected and normal within complex governance landscapes. We have seen positive movement on issues such as Walleye stocking, introduction of harvest slots, expansion of fish stocking capacity, movement to ecosystem-based approach to species at risk, and the *Wild Turkey Management Plan*. Unfortunately, we have not seen the required changes related to "meaningful engagement", which is very troubling to us.

Fish and wildlife management, by its nature, is a partnership where the buy-in and involvement of stakeholders and society are integral if objectives are to be achieved. The current engagement process, while internally viewed as meeting standards, falls short of expectations. Increasingly it is one sided, lacks transparency, excessively technocratic, and caters to the elite. The broader angling and hunting communities do not feel they are part of the consultation process and see their voices as no longer mattering.

The AFGA along with the hunting and angling communities wish to remain strong partners in the management of Alberta's fish and wildlife resource which is a shared responsibility. There are fundamental elements that need to be addressed within the department. The delivery of programs and actions are our collective responsibility to meet sustainability objectives. Now is the time to address the barriers that impair this from occurring. We would like to meet with you directly to discuss next steps to address our concerns.

**The Alberta Fish and Game Association**  
**13045 - 156 Street NW, Edmonton, AB, T5V 0A2**  
**780-437-2342 [office@afga.org](mailto:office@afga.org) [www.afga.org](http://www.afga.org)**

This is not a new issue, and it was the impetus for the *Third-Party Scientific Review of Alberta Environment and Parks' North Central Native Trout Recovery Program*. Internally, Alberta Environment and Parks (AEP) appears to believe that the review was an endorsement of the direction they are moving. This is far from the case, particularly when one recognizes this was a scientific review by peers, not the broader review by AEP, which was originally requested.

Consider, even with this limited focus, the following excerpts from the report that speak to the heart of the problem:

- “There is a lack of clarity and transparency as to how the CEMs were parameterized (i.e. to what extent was local knowledge and broad stakeholder input considered in the development of dose-response curves and the determination of watershed-specific doses?) and what specific criteria were used for the selection of watersheds.”
- “A genuine commitment to transparency and openness on behalf of AEP operations and policy/planning is needed to restore public trust in Alberta Fisheries Management.”

Meaningful engagement does not imply only reacting to the direction developed by AEP, rather it is a partnership that involves two-way communication and involvement. AFGA has provided AEP research and principles on meaningful consultation in the past. There is an expectation that consultations are initiated early in the planning, design, or decision-making processes. Further, they must be transparent, accountable, and accommodating to a variety of viewpoints, when possible. Despite AFGA providing extensive position papers outlining required changes to fisheries management, broadly endorsed resolutions, or requests for scientific research, these papers appear to disappear into a bureaucratic vacuum. This is despite the rigour of research and transparency that went into their development.

The ongoing loss of trust and support for AEP must be acknowledged and dealt with. The AFGA is prepared to do its part. The starting point should be related to fisheries management in the province to address the roadblocks that exist preventing a shared direction and vision. The following need to occur concomitantly:

- Development of meaningful transparent engagement platforms at a local, regional, and provincial level that incorporates a stakeholder-driven consensus-based recommendation, benchmark and target setting process.
- Immediate sharing of the data and science that was used to determine the benchmarks related to the Fish Sustainability Index and Fall Index Netting.
- Systematic, transparent, independent multi-party review of the benchmarks and options used within the Walleye Recreational Fisheries Management Framework, and the Northern Pike Recreational Fisheries Management Framework.

Getting everyone on the same page is critical. Anglers recognize that fisheries management due to a wide range of anthropogenic and/or natural issues is challenging. Understanding the impacts and risks associated with these issues is through observation, local knowledge, traditional knowledge, and scientific research. The use of statistical analysis and models are important to gain a better understanding to aid decision making.

Where the process becomes derailed is that models or frameworks should only be one part of a decision-making spectrum that must balance environmental, economic, and social factors. Such is not the case in Alberta in relation to fisheries management where algorithmic generated outcomes dominate. This is further complicated when benchmarks and parameters within models can be subjective based on perspective or risk aversion. The argument often presented is that a defined process is used in their determination, but this does not mean they are empirical. Affecting all of this is that the priority and perspective of fisheries managers in Alberta is often different to that held elsewhere in North America. This results in the embedding of risk metrics, and variables that are often additive which influence model outcomes.

That goes directly to the issue of trust and transparency, where there continues to be a focus solely on the angler, and not the ecosystem. Before we include assumptions within models, there must be adequate consensus-based research, validated across a wide geographic landscape. This is not the same as using single or limited subset of peer reviewed research for validation.

Fisheries managers are neither right nor wrong, just that their viewpoint may differ from the greater community. Thus, the need for buy-in and consensus around the various variables and inputs from the stakeholder community in the decision-making matrix. These include those associated with maximum sustainable harvest, optimal sustainable yield, gear recruitment coefficients, catchability, risk metrics, population variability, monitoring protocols, ecosystem diversity, ecological integrity, indirect mortality, responsibilities, and decision making.

Sustainability is a holistic concept where the three pillars, environment, economy, and society, must be considered together. As such, sustainability goals are **not met** by setting a finite point on a graph decided by a single discipline. Instead, it involves a multi-disciplinary stakeholder approach that weights trade-offs, benefits, and costs to set the appropriate target. To this day, the Brundtland Commission's definition of sustainable development stands: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

The AFGA along with the hunting and angling community wish to remain strong partners in the management of Alberta's fish and wildlife resources, which is a shared responsibility. For this to occur, there are fundamental elements that need to be addressed within AEP as outlined above. The delivery of programs and actions are our collective responsibility to meet sustainability objectives. Now is the time to address the barriers that impair this from occurring.

On behalf of the AFGA, I want to reiterate our thanks for your resolve to bring about lasting change in the management of Alberta's fish and wildlife resources. We look forward to talking directly with you on the next steps to address our important concerns.

Yours in conservation,



Victor Benz, President  
The Alberta Fish and Game Association

cc: Bev Yee, Deputy Minister, Alberta Environment and Parks, [Bev.Yee@gov.ab.ca](mailto:Bev.Yee@gov.ab.ca)  
Tom Davis, Assistant Deputy Minister, Resource Stewardship, [Tom.Davis@gov.ab.ca](mailto:Tom.Davis@gov.ab.ca)

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