



# Evaluation of the Conservation and Protection Program

January 2025



Photos credit: DFO Facebook

© His Majesty the King in Right of Canada, as represented by the Minister of Fisheries, Oceans and the Canadian Coast Guard, 2025

Cat. No. Fs23-780/2025E-PDF

ISBN 978-0-660-76837-3

# Table of contents

## Evaluation context

---

3

## Program context

---

4 - 5

## Evaluation findings

---

6 - 10

## Recommendations

---

11

## Management action plan

---

12 - 19



Photo credit: DFO Facebook

# Evaluation context: objectives and scope

## Introduction

As requested by senior management, an evaluation of the Conservation and Protection (C&P) program was conducted during fiscal years 2021-22 and 2022-23 by Fisheries and Oceans Canada's (DFO) Evaluation Division. The evaluation was conducted in compliance with the Treasury Board Policy on Results.

## Evaluation objectives and scope

The objective of the evaluation was to identify challenges and opportunities in the delivery and management of the C&P program and to provide senior management with evidence-based information for decision-making and program improvements. The evaluation covered the years 2016-17 to 2021-22 and included national headquarters (NHQ) and all DFO regions (Newfoundland and Labrador, Maritimes, Gulf, Quebec, Ontario and Prairie, Arctic, and Pacific).

As shown below, evidence was gathered from five lines of evidence. To mitigate, where possible, any methodological challenges or limitations, the evidence that was collected was triangulated to establish the reliability and validity of key findings, and to ensure that conclusions and recommendations were based on objective and documented evidence.

## Evaluation questions

Based on key challenges identified during the planning phase and other program work planned at the time, the evaluation was scoped specifically to examine only the following questions:

1. To what extent are the program's core objectives well defined and understood?
2. To what extent are C&P activities aligned with the core objectives?
3. To what extent is the program funded to address core resource requirements?
4. Is the governance of the program effective and efficient (e.g., structures, mechanisms, policies)?

While the evaluation did not scope in questions related to the C&P workforce (e.g., the reorganization and reclassification initiative, training, recruitment), some findings are reported related to these areas as they were brought up in several lines of evidence.



A review of 189 internal documents and program data\*



Interviews with NHQ and regional personnel (n=54)



Financial analysis



A survey to all C&P employees (66% response rate)



A comparative analysis with seven other federal government enforcement programs. The analysis involved nine external interviews and the review of 44 external documents

\* The data review included an analysis of administrative data from the program's National Enforcement Tracking System database.

# Program context

## Background

The C&P program is DFO's enforcement program which promotes and maintains compliance with legislation, regulations, policies and management measures to achieve the overall result that fisheries, oceans and other aquatic ecosystems are protected from unlawful exploitation and interference. The program also plays a leading role in Canada's enforcement and compliance efforts under DFO's mandate, and in the delivery of related obligations under international agreements and treaties. It is one of the oldest enforcement bodies within the federal government, dating back to 1868 when the *Fisheries Act* was established to manage and control fisheries in Canada. Fishery officers were designated within the legislation to enforce provisions of the *Act*, a role that continues today.

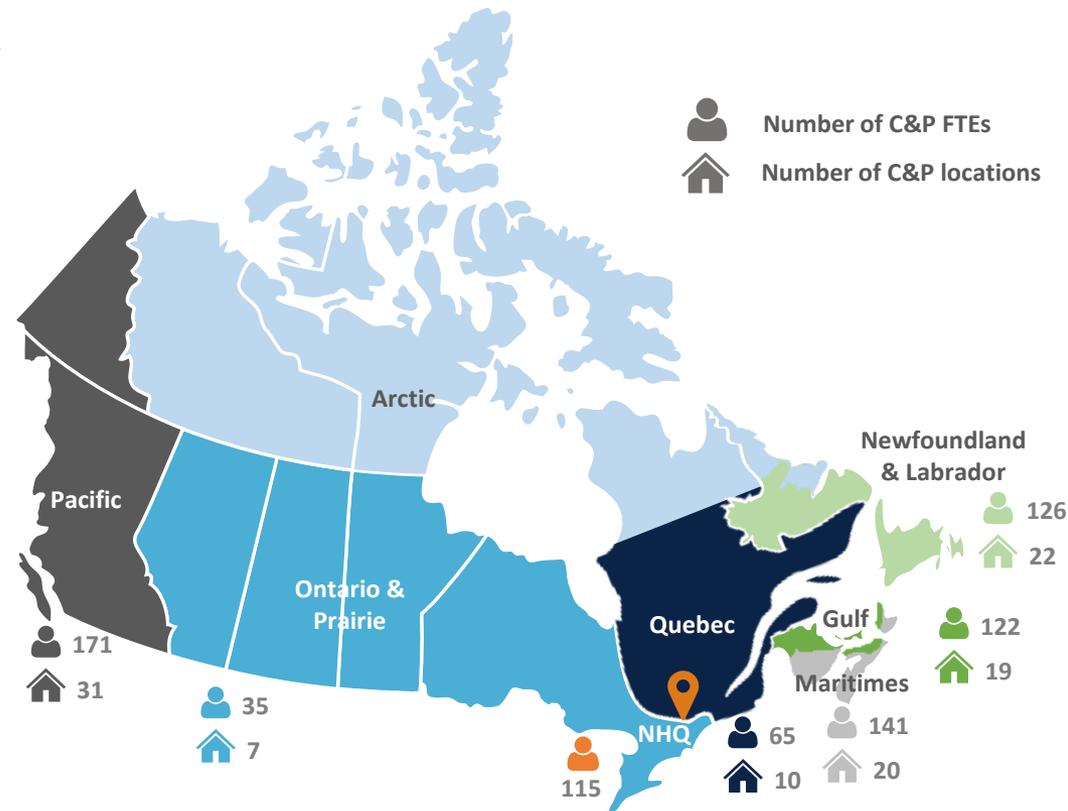
## The people

As of March 31, 2022, there were over 775 C&P employees. Fishery officers are the core operational staff of the program and are usually referred to as DFO's "boots on the ground." In remote and coastal communities, they are often the only face of government, and are considered assets to their communities, providing support for local issues and to members of the public. Other employees in the C&P program play essential administrative, supervisory and operational support roles including but not limited to providing training and intelligence services, maintaining information systems, acquiring specialized equipment, and developing policies and standard operating procedures. These personnel support the operational readiness of fishery officers so they can perform their enforcement work safely and effectively.

## Delivery

The program is administered by the C&P Directorate within DFO's Programs sector in the national capital region. It is delivered operationally in all DFO regions. The Ontario and Prairie region administers the Arctic program thus full-time equivalents (FTEs) for both regions are reported together in Figure 1. Most fishery officers that work in the Arctic region are provided through service delivery agreements with the Directors of C&P in the Ontario and Prairie, Quebec, and Newfoundland and Labrador regions.

Figure 1: Number of FTEs and locations, by DFO region



The number of FTEs in NHQ includes all the National Fisheries Intelligence Service employees who report nationally, but many of whom are in the regions.

# Program context (continued)

## Achieving compliance

The C&P program categorizes their main compliance activities into three groups representing their enforcement approach. This includes progressing from promoting compliance through education and shared stewardship activities; to monitoring, control, and surveillance to deter illegal activities and non-compliance (e.g., through ticketing, warnings); and finally, to conducting special investigations and major cases when threats to the sustainability of Canada's aquatic resources cannot be addressed through activities in the other two categories. While not comprehensive, the lists in Figure 2 show examples of enforcement activities conducted by fishery officers.

## A changing context

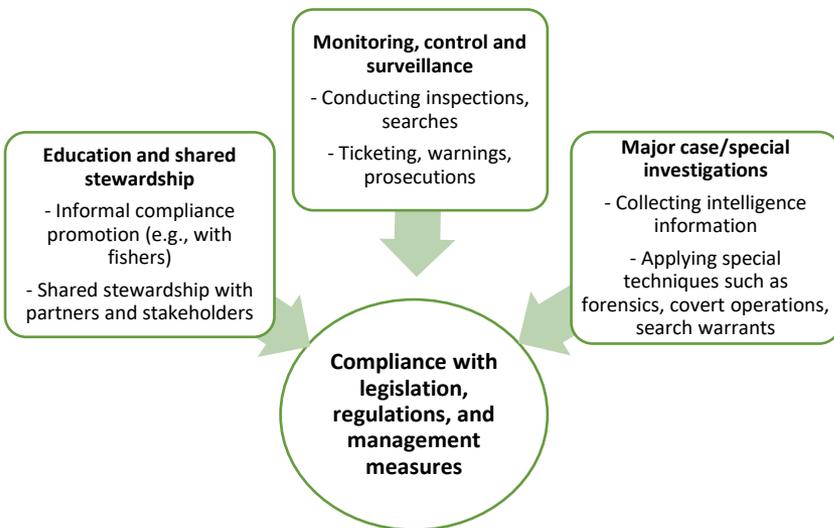
While fishery officers have a long history of enforcing the *Fisheries Act*, their legislative responsibilities have continuously expanded over time; they are also responsible for enforcing provisions under the *Coastal Fisheries Protection Act (1985)*, the *Oceans Act (1996)*, and the *Species at Risk Act (2002)*, as well as regulations under these pieces of legislation. As such, the program contributes to the conservation and protection results of many DFO programs including, but not limited to, Fisheries Management, Fish and Fish Habitat Protection, Species at Risk, and Marine Planning and Conservation.

The context in which the program is operating continues to evolve. Recent amendments<sup>1</sup> to the *Fisheries Act* increased enforcement requirements related to protecting all fish habitat. More frequent impacts of climate change on the quality of shellfish harvest sites creates extra compliance monitoring to protect shellfish consumers from related illnesses. Commitments related to Illegal, Unreported and Unregulated fishing and the recent United Nations High Seas Treaty<sup>2</sup> are also greater. Finally, the government-wide priority for all employees to advance Reconciliation has become more important in daily operations.

The introduction of a formal intelligence function, the National Fisheries Intelligence Service (NFIS) in 2013 is one way the C&P program has responded to the changing context. The NFIS is designed to move the organization from being mainly reactive to more proactive. Intelligence information collected in the field is used to identify "hot spots" of illegal activity and areas of greater risk so enforcement resources can be directed to priority areas.

The use of intelligence information to make the most efficient use of resources is essential given the steady mandate expansion C&P employees are experiencing. In the last five years, staff have continued to see more responsibilities added to their workload due to funding received for various priority initiatives such as Whales Protection (2019), Aerial Surveillance and Enforcement (2019), the Pacific Salmon Strategy (2021-22), and Marine Conservation (2021-22).

**Figure 2: Examples of operational activities contributing to compliance with legislation, regulations, and management measures**



<sup>1</sup> Introducing Canada's modernized *Fisheries Act*: <https://www.dfo-mpo.gc.ca/campaign-campagne/fisheries-act-loi-sur-les-peches/introduction-eng.html>

<sup>2</sup> UN delegates reach historic agreement on protecting marine biodiversity in international waters: <https://news.un.org/en/story/2023/03/1134157>

# Evaluation findings: program mandate, objectives and activities

**FINDING:** The mandate “to promote and enforce compliance with DFO’s legislation, regulations, policies and management measures” is understood, although core program objectives are less clearly defined. Fishery officers conduct many activities that might be important but may go beyond legislated responsibilities and the compliance and enforcement mandate.

## Activities support compliance and enforcement

Employees have a common understanding of the mandate “to promote and enforce compliance with DFO’s legislation, regulations, policies and management measures”; but are less clear on the core objectives of the program. Neither the mandate nor the core objectives are clearly articulated in a key document.

Nevertheless, fishery officers reported conducting activities that align with what they understand to be the core program mandate. However, given they have operational equipment (e.g., vessels, trucks) to provide support for other on-the-ground priorities, fishery officers also conduct activities that may not necessarily contribute to compliance and enforcement. For example, they:

- Support other programs in DFO (e.g., removing ghost fishing gear); and,
- Support departmental or across government priorities (e.g., tagging and towing whales).

## There are workload pressures

C&P employees, including fishery officers, are described as passionate about their jobs and dedicated to the mandate of the program. However, their workloads are reported to be heavy. As previously described, roles and responsibilities have evolved over time and some government-wide priorities have changed the nature of C&P operations. Heavy workloads combined with capacity gaps in some functional areas and staffing challenges are affecting a healthy work-life balance.

The C&P program is not alone, as other federal enforcement programs often experience increased responsibilities without receiving extra resources. Evaluation interviewees put forward some suggestions to help relieve workload pressures by delivering program elements in alternative ways. Two such suggestions were to hire more students to perform tasks that do not require a trained and armed fishery officer (e.g., to conduct basic vehicle maintenance), and second, to increase the use of drones to conduct monitoring and gather patrol data more efficiently.

The following program changes are being implemented to respond to program pressures:

- Adding a new national resource to support employee wellness;
- Launching a single-window recruitment initiative to hire and train new fishery officers so they can be up and running more quickly; and
- Continuing a reorganization initiative focused on fishery officer career progression and retention.



# Evaluation findings: program funding

**FINDING:** Program funding increased over the six-year period—largely to support aerial surveillance and priority initiatives. Capital funding was stable or declined over time.

## Increases in funding were concentrated in certain areas

Total program funding increased by \$55 million between 2016-17 and 2021-22 (Figure 3). Aerial surveillance accounted for \$13.2 million and temporary funding for priority initiatives (e.g., whales protection, marine conservation and Pacific Salmon Strategy) accounted for \$23.8 million of this amount.

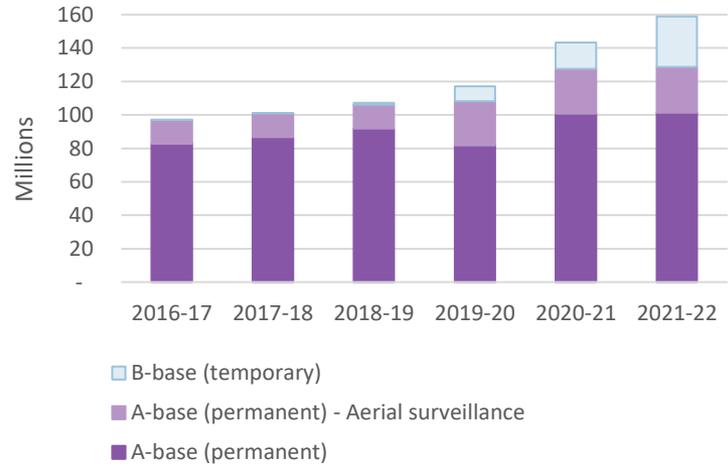
Temporary funding can be a challenge, especially when new fishery officers are needed. It takes 30 months to train new fishery officers. So, either existing officers take on the additional duties of new, short-term initiatives or the program must manage the risk of hiring permanent employees with temporary funding.

## Salary and O&M increased along with program pressures

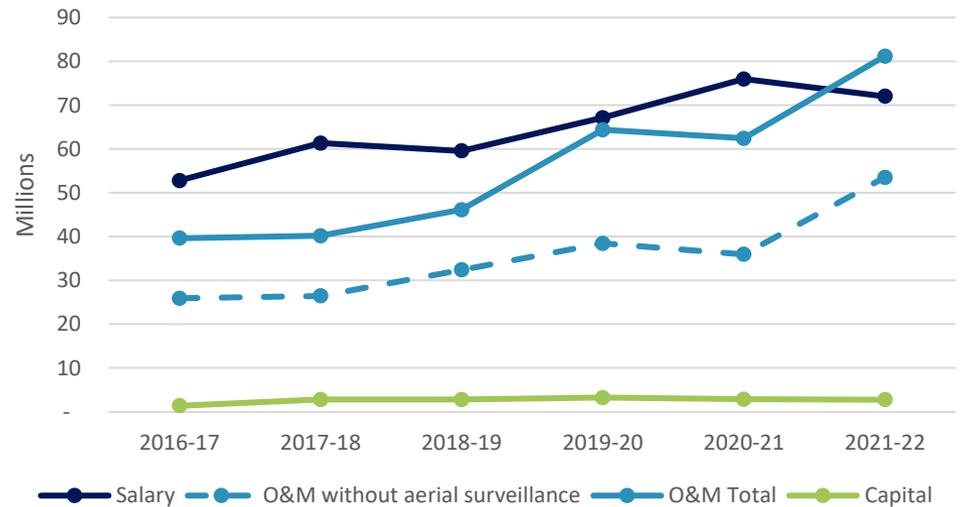
While salary and operations and maintenance (O&M) funding increased over the six-year period, capital funding was stable or declined (Figure 4).

It was also reported that the program experienced numerous pressures during the same period that added to its costs, including higher legal and prosecution fees; responding to severe weather events; rising salaries; increased demand in fisheries; new facilities needed in remote locations where costs are not covered by real property budgets; and a significant number of aging assets.

**Figure 3: C&P temporary and permanent funding by fiscal year**



**Figure 4: Program funding and funding purpose (Vote) by fiscal year**



Source: DFO Chief Financial Officer

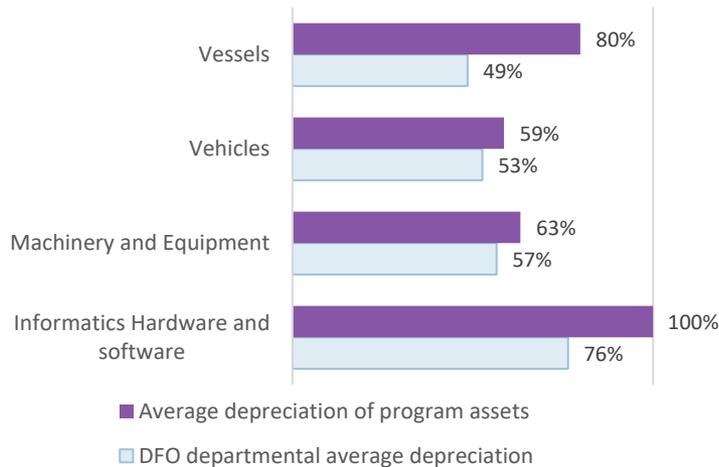
# Evaluation findings: capital assets

**FINDING:** Capital assets have depreciated beyond the departmental average and key assets are near or past the end of their useful life.

## Capital investments have not offset asset depreciation

The program depends on a variety of capital assets for delivery, including vessels, vehicles, ATVs, motors, snowmobiles and specialized equipment such as radar, sonar, and night vision goggles. Investments in these assets have not kept up with the Department as a whole. The most numerous types of capital assets held by the program were found to be older (i.e., more depreciated) than the departmental average, especially vessels such as patrol boats (Figure 5).

**Figure 5: C&P assets depreciation compared to departmental average as of March 31, 2022**



## Key program assets are near or past the end of their useful life

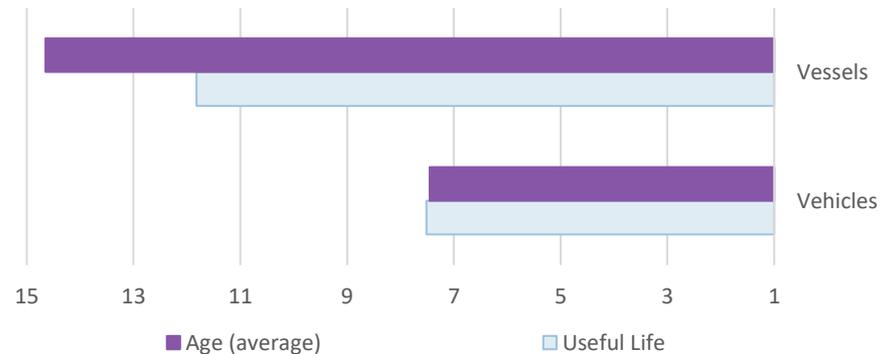
Vessels have largely surpassed their useful age while vehicles are over or near the end of their useful life (Figure 6).

Vessels have exceeded their useful life in each region except Ontario and Prairie, which is approaching the same status. It is expected that this will be somewhat mitigated by funding approved in January 2022 to purchase 25 new small craft vessels for the C&P program for 2023-24.

The average age of program vehicles in all regions has passed or is close to the end of their useful life.

Older vessels and vehicles mean more maintenance and repairs and contribute to safety risks related to using old assets.

**Figure 6: C&P vessel and vehicle age compared to useful life, as of March 31, 2022**



# Evaluation findings: program governance

**FINDING:** While there is no agreement about the best reporting structure for the C&P program, there is strong support for consistent reporting structures in all regions.

## Reporting structures vary from region to region

In four of the seven DFO regions, the Director of C&P reports to the Regional Director of Fisheries Management. In the other three regions, they report to the Regional Director General (RDG). In all regions, there is line (direct) reporting within the regions plus functional reporting to the Director General (DG) of C&P in NHQ. This means C&P regional directors have two reporting relationships, which presents challenges if the direction provided is not aligned.

The question about the best reporting structure to support the effective and efficient delivery of DFO's national enforcement program has been previously examined by the department in various internal and external reviews. Further, reporting models have changed more than once in some regions, and most RDGs have noted there are advantages and disadvantages of different reporting structures for the C&P program.

Senior management interviewed for the evaluation reported that any reporting structure can work if the appropriate supports are in place. Formally established communication mechanisms between C&P NHQ and RDGs or Regional Directors of Fisheries Management would provide for more direct and regular communication, which in turn would help strengthen current governance structures, accountabilities, and the two-way flow of information.

## Support for consistent reporting structures

While there is mixed agreement about the best reporting structure to deliver DFO's national enforcement program effectively and efficiently, there is broad support for consistent reporting structures in all regions.



of survey respondents agreed or somewhat agreed that the reporting structures should be the same in all regions (n=411)

In the four regions where the program reports through Fisheries Management rather than directly to the Regional Director General, some interviewees noted that this relationship could influence enforcement activities and result in fewer C&P issues being brought forward at regional discussion tables. While C&P and Fisheries Management share some common objectives (e.g., fisheries sustainability), there are some areas of divergence (e.g., economic viability). Further, C&P employees have enforcement responsibilities for other programs such as species at risk and marine conservation and planning.

The main governance body for the C&P program is the National Executive Committee (NEC). According to the Draft Terms of Reference for the NEC, its main purpose is to provide leadership and advice on the policy and operations of the program for the purposes of supporting program delivery and managing issues in an effective and efficient manner. It was shared that the duplication in committees across the program plus the inconsistencies in reporting structures have an impact on the NEC, because they can result in a lack of clarity about where program decisions are being made. Evaluation evidence indicates that NEC faces challenges with decision-making including many delays.

# Evaluation findings: design and delivery

**FINDING:** Both flexibility and consistency are needed in the program design and delivery. Work is needed to better integrate the NFIS into the program and to support more effective use of its intelligence products.

C&P is a national program with a regional delivery structure. Both flexibility and consistency are needed to optimally support regions and employees.

Flexibilities are needed to address different regional and operational contexts. Some examples of regional situations that may create the need for specialized policies, training or equipment are listed below.

- Different species of fish or other aquatic species (e.g., whales on the coastlines or multiple invasive species in the Great Lakes).
- The presence of open water or year-round ice.
- The presence or absence of marine conservation areas.

Program employees indicated support for consistent policy instruments [i.e., policies, directives, standard operating procedures (SOPs)], roles and responsibilities, organizational structures, uniforms, data entry, equipment acquisition and planning for training and recruitment.

Regarding policies, the C&P program has over 200 policy instruments to guide operations. Program employees reported many are either out-dated, have not been developed, or are duplicative. Where policies and SOPs are not nationally consistent, the lack of uniformity means regional employees are not always clear on which ones to follow.

Program employees supported the concept that NHQ should be providing the main program policies to support consistent delivery of the program. Some interviewees said that regional policies should be the exception more than the rule.

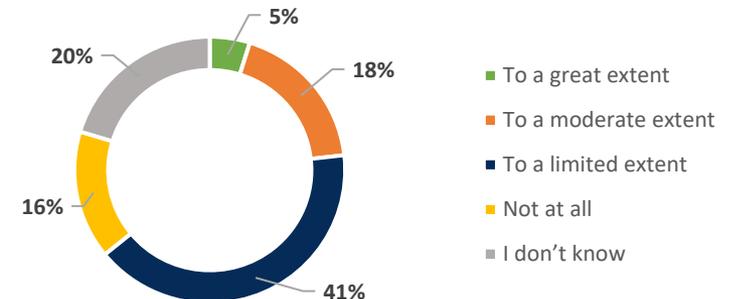
There was evidence from the evaluation that the program has been unable to address policy gaps due to a lack of capacity; however, it has recently created a policy analyst group dedicated to advancing work on policy review and development.

## Move to an intelligence-led program

While the C&P program previously collected intelligence information informally, the NFIS was formalized within the program in 2013 to support knowledge-based decision making by offering C&P managers strategic intelligence products to assist with priority-setting, and second to establish priorities and follow-up action plans to control, reduce, or more importantly, mitigate in advance threats and risks.

While there is evidence of improvement, overall progress has been slow integrating the NFIS into the program and making full use of intelligence products. In most regions, there is a gap between regional C&P employees and NFIS analysts in understanding each others' roles, needs, and the changes that come with shifting to an intelligence-led organization.

**Figure 7: To what extent is the intelligence information being produced by the NFIS being used in the regions? (n=418)**



# Recommendations

As a result of the evaluation findings, four recommendations have been developed.

**Recommendation 1:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all Regional Directors General, clarify the program mandate and objectives, which will guide the activities needed to achieve the intended results. These changes will then need to be supported and implemented and communicated widely within the program and across the department.

**Recommendation 2:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all Regional Directors General, strengthen program accountabilities and facilitate consistent national program delivery, which includes a review of program governance, reporting structures and the communication between NHQ and the regions.

**Recommendation 3:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all the Regional Directors General, improve financial forecasting methods and tools, increase transparency and support the planning and allocation of funds for program delivery.

**Recommendation 4:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all the Regional Directors General, prioritize the integration of the National Fisheries Intelligence Service in the program and clarify the roles and responsibilities of all employees in the production and use of intelligence.



Photo credit: DFO Facebook



# Management action plan (MAP)

## Evaluation of the Conservation and Protection Program

**Date:** September 2024

**MAP Completion Target Date:** September 2026

**Lead ADM/DC:** ADM, Programs Sector, Fisheries and Harbour Management Branch

### Recommendation 1: June 2025

**Recommendation:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all Regional Directors General, clarify the program mandate and objectives, which will guide the activities needed to achieve the intended results. These changes will then need to be supported and implemented and communicated widely within the program and across the department.

**Rationale:** Employees have a common understanding of the compliance and enforcement mandate; however, interviewees were less clear on core objectives. Program employees, including fishery officers and those in support roles, conduct many activities that may not align with the compliance and enforcement mandate. A clear mandate and objectives will help guide what activities are needed to achieve intended results. The role of the NFIS should be considered in the clarification of core program objectives and activities to support the intelligence-led model.

The C&P program contributes to the conservation and protection results of many DFO programs. While it will be essential to communicate any changes to the program logic across the C&P program, it will also be important to reflect changes in key program documents and communicate to other programs within the department at NHQ and in each region.

### Management response

C&P accepts this recommendation and proposes to respond according to the following results statement and associated milestones. C&P NHQ will seek the endorsement and partnership of Regional Directors General (RDGs) before engaging in a collaborative process between C&P NHQ and in the Regions to develop a new mission statement and will ensure that program objectives are fully aligned to it.

A framework will also be developed to ensure C&P national and regional outcomes and activities are intelligence-supported, results-driven and risk-based (also in support of Recommendation #4). This framework will be guided by a schematic diagram describing the program's structure, activities and expected outcomes (referred to as a logic model), that will align with and contribute to C&P's new mission statement. To achieve this, C&P will work with the Results Division in the CFO Sector.

C&P NHQ is currently engaged in a multi-year project that focuses on addressing human resource, priority setting and reporting gaps that will intersect with and support the Evaluation's proposed results statements and milestones. As a result of this work, C&P expects to be better positioned to deliver a nationally consistent program while improving strategic direction and accountability in its regions.

C&P will seek the support of Communications in Milestone 1.3 where necessary in communicating results and outcomes through the program and the department.

### Link to larger program or departmental results (if applicable)

Departmental Result 1.4 (Fisheries, oceans and other aquatic ecosystems are protected from unlawful exploitation and interference)

# Management action plan(MAP) (continued)

<b>MAP results statement</b> <i>Result to be achieved in response to the recommendation</i>	<b>MAP milestones</b> <i>Critical accomplishments to ensure achievement of result for PMEC's approval</i>	<b>Completion date</b> <i>Month, Year</i>	<b>RD/DG responsible</b>
<p>1. C&amp;P national program mission statement and objectives are developed in collaboration with the regions, and endorsed by the ADM, Programs Sector and RDGs. This mission statement is guided by a logic model that supports program objectives and key activities (including training and regional work planning).</p>	<p>1.1 C&amp;P NHQ and in the regions endorse undertaking a collaborative approach to clarify the program's mission, objectives and activities and agree to integrate a reference to risk-based and/or intelligence-led decision making in C&amp;P's new mission statement.</p>	<p>September 2024</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>1.2 C&amp;P NHQ and the regions collaborate to jointly develop a clear Program mission statement. C&amp;P NHQ and the regions work with the Results Division to collaboratively develop a logic model that clearly expresses how the activities and objectives are linked to the mission statement and deliver it.</p>	<p>December 2024</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>1.3 Once ADM, Programs Sector and the RDGS are briefed and approval is obtained for a mission statement, a communications plan is developed and implemented with the support of Communications that seeks to inform all C&amp;P program participants, then broadly across the sector and the rest of the department.</p>	<p>June 2025</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>

# Management action plan(MAP) (continued)

## Recommendation 2: September 2026

**Recommendation:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all Regional Directors General, strengthen program accountabilities and facilitate consistent national program delivery, which includes a review of program governance, reporting structures and the communication between NHQ and the regions.

**Rationale:** C&P is a national program, but there are inconsistencies in different areas including, but not limited to, reporting structures and organizational structures, both of which create differing accountabilities and confusion about where to seek direction.

Some of NHQ's roles are overall governance (e.g., management of the NEC), establishing priorities for strategic national direction and across-program communication. NHQ has national accountability for the program, and can provide guidance; however, regional C&P employees are not directly accountable to NHQ as final decision-making rests within regions.

While the best reporting structure to support an effective program has been examined by the department several times in the past, there is mixed agreement on the best options for the program. Evaluation evidence does, however, support having a consistent structure in all regions.

## Management response

C&P accepts this recommendation and proposes to respond according to the following results statement and associated milestones. It will seek the endorsement and partnership of RDGs before engaging in a collaborative process between C&P NHQ and in the Regions to address C&P's reporting and governance challenges.

C&P NHQ is currently engaged in a multi-year project that focuses on addressing human resource, priority setting and reporting gaps that will intersect with and support the Evaluation's proposed results statements and milestones. As a result of this combined work, C&P expects to be better positioned to deliver a nationally consistent program with improved reporting structures, strategic direction and accountability in its regions.

C&P will seek the support of Communications where necessary in communicating results and outcomes through the program and the department.

## Link to the larger program or departmental results (if applicable)

Departmental Result 1.4 (Fisheries, oceans and other aquatic ecosystems are protected from unlawful exploitation and interference)

# Management action plan(MAP) (continued)

<b>MAP results statement</b> <i>Result to be achieved in response to the recommendation</i>	<b>MAP milestones</b> <i>Critical accomplishments to ensure achievement of result for PMEC's approval</i>	<b>Completion date</b> <i>Month, Year</i>	<b>RD/DG responsible</b>
<p>2. An improved governance model and reporting structure are developed and endorsed by C&amp;P NHQ and in the regions that aims to achieve more consistent program delivery, strengthened accountabilities and improved strategic direction to the regions.</p>	<p>2.1 C&amp;P conducts a review of its governance model and organizational reporting structures with a view to reduce inefficiencies and foster national consistency in reporting structures. This includes reviewing roles and responsibilities across C&amp;P to clarify and strengthen accountabilities for NHQ and in the regions.</p>	<p>June 2025</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>2.2 A new governance model is developed jointly and approved by C&amp;P NHQ and the regions that outlines the mechanisms and processes required for its implementation while clearly defining roles and responsibilities across the program. This model will be supported by a new accountability framework that describes mechanisms and protocols for strategic and operational decision-making and accountability across C&amp;P.</p>	<p>June 2026</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>2.3 A communications plan for dissemination across the C&amp;P program is developed and approved by ADM Programs Sector, with the support of Communications, and the endorsement of RDGs and then implemented to communicate with staff.</p>	<p>September 2026</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>

# Management action plan(MAP) (continued)

## Recommendation 3: September 2026

**Recommendation:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all the Regional Directors General, improve financial forecasting methods and tools, increase transparency and support the planning and allocation of funds for program delivery.

**Rationale:** While there have been influxes of B-base funding for new initiatives and for the aerial surveillance component of the program, core A-base funding has remained relatively stable and O&M budgets have decreased over the scope of the evaluation at a time when inflation has increased the cost of many O&M expenses.

While B-based funds have helped the program, they are not a stable source of funding if related initiatives are not renewed but the responsibilities that were added to the workloads of employees continue.

The C&P program is an operational program by nature. To deliver the program as intended, it depends on a wide range of assets, including but not limited to vehicles, vessels, data systems, specialized equipment and technology. Without many of these assets, the program is at risk of not being able to deliver on all its results.

### Management response

C&P accepts this recommendation and proposes to respond according to the following results statement and associated milestones. It will seek the support of the CFO in developing an evidence-based process that allows for a proactive approach to funding and planning future C&P operations and activities. This will be a collaborative process between C&P NHQ and Regions to better identify the sources of pressure to program funding and articulate them appropriately to seek to ease financial pressures.

C&P NHQ is currently in the first phase of a multiyear project that focuses on addressing human resource, priority setting and reporting gaps that will intersect with and support the Evaluation's proposed results statements and milestones. As a result of this work, C&P expects to be better positioned to deliver a nationally consistent program while improving strategic direction and accountability in its regions.

C&P will require the assistance and support of the CFO in developing a financial planning process to forecast planned expenditures more accurately and with greater confidence.

### Link to the larger program or departmental results (if applicable)

Departmental Result 1.4 (Fisheries, oceans and other aquatic ecosystems are protected from unlawful exploitation and interference)

# Management action plan(MAP) (continued)

<b>MAP results statement</b> <i>Result to be achieved in response to the recommendation</i>	<b>MAP milestones</b> <i>Critical accomplishments to ensure achievement of result for PMEC's approval</i>	<b>Completion date</b> <i>Month, Year</i>	<b>RD/DG responsible</b>
<p>3. A comprehensive accounting of C&amp;P assets, personnel, and capital and O&amp;M funding is used to develop a planning process that will more accurately identify gaps in program funding across C&amp;P. Improved financial forecasting methods and tools are used to deliver a comprehensive accounting of C&amp;P assets, personnel, capital and O&amp;M funding requirements to better identify gaps in program funding across C&amp;P.</p>	<p>3.1 An accounting of C&amp;P requirements, assets and operations identifies key gaps in existing program funding.</p>	<p>September 2024</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>3.2 A plan is adopted to seek to address key resource gaps, both currently and forward-looking, with support from the CFO. This plan enables C&amp;P to develop a process that can better and more thoroughly articulate salary, capital and O&amp;M needs, including major capital projects and the adoption of new technologies.</p>	<p>September 2025</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>3.3 C&amp;P has at its disposal, a repeatable, reliable and evidence-based financial planning process, with the support of the CFO, to routinely forecast needs and planned expenditures more accurately and with greater confidence.</p>	<p>September 2026</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>

# Management action plan(MAP) (continued)

## Recommendation 4: March 2026

**Recommendation:** It is recommended that the Assistant Deputy Minister, Programs Sector, Fisheries and Harbour Management Branch, in collaboration with all the Regional Directors General, prioritize the integration of the National Fisheries Intelligence Service (NFIS) in the program and clarify the roles and responsibilities of all employees in the production and use of intelligence.

**Rationale:** A major program change in the last 10 years was the introduction of the NFIS in 2013. The NFIS was created to shift the program from being a reactive enforcement organization to a more proactive one that uses intelligence information to help direct limited resources to areas of greatest risk to the department.

Regions have been slow to integrate the NFIS into the program as intended. There is resistance in the regions, and a disconnect between regional employees and the intelligence service in terms of understanding each other's roles and needs and the changes that are necessary to shift to an intelligence-led enforcement organization.

## Management response

C&P accepts this recommendation and proposes to respond according to the following results statement and associated milestones. It will seek the endorsement and partnership of RDGs before engaging in a collaborative process between NHQ and Regions to seamlessly integrate risk-based and intelligence-led decision-making procedures for C&P, including in its new mission statement (Recommendation #1).

C&P NHQ is currently engaged in a multi-year project that focuses on addressing human resource, priority setting and reporting gaps that will intersect with and support the Evaluation's proposed results statements and milestones. As a result of this work, C&P expects to be better positioned to deliver a nationally consistent program that prioritizes highest risk compliance promotion activities, while improving strategic direction and accountability in its regions.

C&P will seek the support of Communications where necessary in communicating results and outcomes through the program.

## Link to the larger program or departmental results (if applicable)

Departmental Result 1.4 (Fisheries, oceans and other aquatic ecosystems are protected from unlawful exploitation and interference)

# Management action plan(MAP) (continued)

<b>MAP results statement</b> <i>Result to be achieved in response to the recommendation</i>	<b>MAP milestones</b> <i>Critical accomplishments to ensure achievement of result for PMEC's approval</i>	<b>Completion date</b> <i>Month, Year</i>	<b>RD/DG responsible</b>
<p>4. C&amp;P national and regional decision-making and planning is informed by intelligence and risk. This is especially critical when planning compliance verification activities that address areas or entities representing an elevated risk to aquatic resources.</p>	<p>4.1 C&amp;P NHQ and the regions agree to integrate a reference to risk-based and/or intelligence-supported decision-making in C&amp;P's mission statement.</p>	<p>September 2024</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>4.2 Roles, responsibilities and limitations (legislative, operational, and administrative) for NFIS are reviewed and adjusted as necessary with the agreement of C&amp;P NHQ and the regions to facilitate the implementation of risk-based, intelligence-supported decision-making at all levels of C&amp;P, including in priority-setting.</p>	<p>December 2024</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>4.3 Regional communication channels are established to support national consistency and promote information sharing between C&amp;P operational and intelligence staff. The systematic use of regional and national intelligence products begins to improve integration of C&amp;P's National Fisheries Intelligence Service (NFIS) with C&amp;P's operations and other compliance promotion activities.</p>	<p>June 2025</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>
	<p>4.4 A communication plan is developed, approved and implemented to communicate with staff.</p>	<p>March 2026</p>	<p>ADM, Programs Sector, Fisheries and Harbour Management Branch</p>