

Enforcing the Law on Ontario's Lands and Waters:
A History of the Province's Conservation Officers

While some histories of natural resource management in Ontario could focus on images of high-ranking government officials, powerful business interests, and environmental groups, an often overlooked aspect of this subject has been the important role that the Conservation Officer (CO) has played in preserving the province's wildlife. When Ontario's first COs (originally called game wardens) were appointed by the provincial government in the early 1890s, they were tasked primarily with enforcing relevant hunting and fishing laws and with promoting the principles of wildlife conservation among the general public. Unfortunately, for many years these individuals lacked the necessary numbers, formal training, and resources that were needed to carry out their duties effectively. However, following the formation of the Ontario Ministry of Natural Resources (MNR) in 1972, the conditions under which modern COs have operated have steadily improved. Today, Ontario's COs are well-equipped to enforce a wide range of legislation and regulations pertaining to the province's natural resources, allowing them to outperform the pioneers of the profession in practically every way. Nonetheless, although the nature of the conservation officers' work has evolved considerably over the past century, the fundamental purpose of their job – to serve as the “guardians of Ontario's natural resources” – remains unchanged.¹

Although some of Ontario's earliest game laws date from the eighteenth century, the provincial government's oversight of these valuable resources was initially quite lax.² For example, in 1807, in an attempt to curb overfishing and halt the decline of Lake Ontario's Atlantic salmon population, it passed *The Act for the Preservation of Salmon*. Despite its good

¹ C.J. (Bud) Wildman, introduction to *Game Wardens: Men and Women in Conservation* by Joe Fisher (Queen's Printer for Ontario, 1992), v.

² Michael Commito, ““Our society lacks consistently defined attitudes towards the black bear’: The History of Black Bear Hunting and Management in Ontario, 1912-1987,” (PhD Diss., McMaster University, 2015), 35

intentions, a complete lack of enforcement rendered the legislation relatively useless, and by 1883 Atlantic salmon were extinct in Lake Ontario. Other measures were enacted during this period in an effort to preserve various species of wild game and fish in Ontario, but “the slaughter of animals, birds and fish proceeded as if legislation did not exist. Wildlife populations shrank and shrank.” Over the course of the nineteenth century, the rapid growth of Ontario’s population, coupled with the advent of agricultural, urban, and industrial development in the province, continued to place further strains on the environment and its nonhuman inhabitants.³ It was not long before both the people of Ontario and its political leaders were expressing grave concern about the future of the province’s wildlife resources.

Ontario’s first “game wardens” were therefore hired out of dire necessity to better protect the province’s fish and furbearing animals from overhunting and other careless practices. In 1890, the government of Ontario created a Royal Commission, aptly dubbed the Ontario Game and Fish Commission (OGFC), to study the lowly state of the province’s fish and game populations and to propose potential solutions to this ongoing problem. Two years later, the Commission issued a landmark report which called for a major shift in how the provincial government managed its wildlife resources.⁴ Most importantly, after asserting that “the close[d] seasons for Game and Fish are not generally respected throughout the Province,” the OGFC unanimously recommended “that a Provincial force of Game and Fish Wardens or Protectors should be established.”⁵ These wardens would be paid a salary to enforce Ontario’s game laws and would operate under the authority of the Commission itself.⁶ In 1892, the Ontario

³ Fisher, 8-10.

⁴ Richard S. Lambert and Paul Pross, *Renewing Nature’s Wealth: A Centennial History of the Public Management of Lands, Forests, and Wildlife in Ontario, 1763-1967* (Toronto: Ontario Department of Lands and Forests, 1967), 449.

⁵ *Ontario Game and Fish Commission: Commissioners’ Report* (Toronto: Warwick & Sons, 1892), 196, <https://archive.org/stream/commissionersrep1892ontauoft#page/n5/mode/2up> (accessed 27 September 2016).

⁶ Lambert and Pross, 450.

government selected five men to serve as the game wardens for the entire province, and also implemented many of the other recommendations put forth by the OGFC that were designed to safeguard the area's natural resources.⁷

From the late nineteenth to early twentieth century, Ontario's game wardens were generally underpaid, overworked, and unprepared to handle the monumental task put before them. These conservation pioneers had no formal training, received a monthly salary of \$10, were expected to provide many of their own supplies, and had "to travel by train, by horse or by carriage to the limits of civilization, then hike through the bush as far as their legs would carry them." Although they were authorized to charge and convict offenders on site, and received backup from hundreds of volunteer deputy wardens, there was still simply too much land and lawbreaking in Ontario for this small squad of officials to manage. The situation was exacerbated in 1907 when the provincial government formed the Department of Game and Fisheries and made Ontario's game wardens responsible for exercising their powers over fish as well (this had previously been left to "fishery overseers"), thereby placing even greater pressure on an already bogged down workforce. As the years passed, the scope of the game wardens' job expanded, yet the tools and support systems at their disposal did not keep pace. Then, in the summer of 1934 and in the midst of the Great Depression, the Ontario government delivered a shocking blow by dismissing 117 of its game wardens, along with 500 deputy wardens. The effects of this policy were quickly felt, with convictions for game and fish violations dropping nearly 40 percent between 1933 and 1934.⁸ At this point, the future looked uncertain for both Ontario's game wardens and the resources they had been hired to protect.

⁷ Fisher, 15.

⁸ Ibid., 15-28.

Thankfully, the two decades following the end of the Second World War were a much more positive and formative period for Ontario's COs. This era witnessed the rise of progressive resource management strategies in the province. In other words, scientific and environmental concerns, rather than purely economic ones, began playing a more prominent role in shaping pertinent legislation and policies. This dynamic ultimately had significant bearing on how COs conducted their business. First, in 1946, the Department of Game and Fisheries was amalgamated with the Department of Lands and Forests (DLF) – predecessor to the MNR – in order “to bring together all the natural resources of the Province under a single administration” which focused heavily on the notion of “scientific management.”⁹ Two years later, game wardens officially came to be known as conservation officers as a reflection of their renewed collective position as “an ambassador of conservation, a public relations person for the welfare of the resource.”¹⁰ As part of this transition, the DLF began offering new training courses to educate its officers on crucial ecological principles, particularly as they related to the fish and wildlife species of Ontario. By extension, COs were soon charged with a much broader mandate which included, but was not limited to, gathering data for the DLF's biologists, conducting habitat assessments, providing hunter safety training, and assessing applications for commercial fishing licenses.¹¹

Yet a multitude of issues continued to pose problems for staff during these years. As their list of responsibilities grew, conservation officers' ability to adhere to their traditional enforcement duties suffered. Consequently, convictions in the province plummeted between 1956 and 1963. Overall, many officers began to “feel they were treated as work horses for

⁹ Lambert and Pross, 454.

¹⁰ Fisher, 32-33.

¹¹ *Ibid.*, 31-35.

management programmes” and that “scant respect or consideration was afforded their enforcement responsibilities. And their wages continued to slide.”¹² More generally, by the late 1960s, with the environmentalist ethos just beginning to exert considerable social and political influence across North America, the state of Ontario’s wildlife resources remained a source of anxiety for COs, the government, and the province’s citizenry alike. For example, in a 1967 issue of its journal, the *Ontario Fish and Wildlife Review*, the DLF took the opportunity to reflect upon the past, present, and future of wildlife management in Canada:

The changes that have taken place in our fisheries and wildlife resources in Canada’s first hundred years have been mostly destructive ... Whereas the discovery of the first hundred years was how to conquer the wilderness, maybe in the future we shall learn how to restore the paradise that used to be home. One day, we can hope to reach the stage where gains in this direction will be permanent and cumulative. Who knows whose little push may start the whole thing rolling.¹³

Unbeknownst to the anonymous author of this quote, the “little push” for which they were hoping was just on the horizon.

The birth of the MNR in 1972 (following the merger of the DLF with the Department of Mines and Northern Affairs) forever altered Ontario’s natural resource regime, an event which helped elevate the status of the province’s conservation officers over the course of the 1970s.¹⁴ Formed at a time when Ontarians were expressing unprecedented concern for issues like water and air pollution, the Ministry endeavoured to manage the province’s resources in an environmentally and socially responsible manner from its earliest days.¹⁵ One of the defining characteristics of this new approach was a sudden “rise in [COs’] enforcement responsibilities as

¹² Ibid., 33-35.

¹³ “Looking Ahead to 2067,” *Ontario Fish and Wildlife Review* 6, no. 1-2 (1967), 1.

¹⁴ *The Ministry of Natural Resources Act, 1972*, Statutes of Ontario 1972, Chapter 4, 67-71.

¹⁵ Mark S. Winfield, *Blue-Green Province: The Environment and Political Economy of Ontario* (UBC Press, 2012), 21; “Public concern growing over environment: Davis,” *The Globe and Mail*, 24 August 1971, page 5.

lawmakers strove to safeguard nature from a multitude of hazards.”¹⁶ This combination of legislative reform and changing public attitudes toward the environment allowed Ontario’s conservation officers to exercise their powers with greater success and more firmly establish themselves as the defenders of the province’s invaluable natural wealth. As the Ministry itself aptly asserted in 1978, “illegal activities ... are damaging our wildlife and fisheries resources and their potential threat is staggering ... this is why an efficient and credible enforcement capability is necessary ... As long as there are law breakers, enforcement will be necessary.”¹⁷

Throughout the 1970s, various pieces of wildlife legislation - both new and old - were brought under the jurisdiction of Ontario’s conservation officers. For many years, the authority of COs was limited to just a few key statutes, such as the *Game and Fish Act*, the *Ontario Fisheries Regulations Act*, and the *Migratory Birds Convention Act*, but during this decade their legal responsibilities broadened considerably.¹⁸ For example, with the passage of the *Endangered Species Act, 1971*, the Ontario government specifically designated conservation officers as the primary protectors of the province’s most vulnerable flora and fauna.¹⁹ Likewise, in 1973, with Ontario’s provincial parks system plagued by rowdy park visitors who often behaved unlawfully, the government hired fifteen COs in ten parks to help the Ontario Provincial Police (OPP) maintain order.²⁰ In fact, after a revision to the *Provincial Parks Act*, conservation officers became empowered with the authority of an OPP officer when operating within provincial park boundaries.²¹ The growth and development of COs’ legal power should come as

¹⁶ Fisher, 35.

¹⁷ “Editorial,” *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 1

¹⁸ Fisher, 35.

¹⁹ *Endangered Species Act, 1971*, Statutes of Ontario 1971, Chapter 138, 1169-1170.

²⁰ Gerald Killan, *Protected Places: A History of Ontario’s Provincial Parks System* (Toronto: Dundurn Press Limited, 1993), 266.

²¹ Fisher, 35.

no surprise because, in the words of one former DLF biologist, “laws are an integral part of the management of the wildlife resource ... We must strive for the best use of the resource ... in society in which all concepts including that of the law are constantly evolving ... into more adequate forms.”²²

Predictably, the Ministry eventually realized that it had to subject its COs to more rigorous training standards, as well as provide them with higher quality equipment and supplies, in order to better prepare them for what lay ahead. Conservation officers had been hired on a rather arbitrary basis and had received no training of any kind during the early twentieth century, and while the Ontario government did introduce some more stringent guidelines in the postwar era, “training for COs acquired little sophistication before the 1970s.”²³ Under the MNR, however, professional standards for Ontario’s COs consistently rose. By the late 1970s, most new recruits had a postsecondary education – candidates were not even required to have their Grade 12 diplomas prior to 1968 – and each one had to attend a mandatory three-week enforcement course offered by the OPP.²⁴ As the decade drew to a close, the MNR proudly exclaimed that “Our 213 Conservation Officers receive law enforcement training of the highest calibre and the most modern forensic science facilities are at their disposal. These men are professionals in this field and committed to the conservation of our fish and wildlife resources.”²⁵ In terms of work-related tools, the Ministry also initiated some noteworthy reforms during these years, including new uniforms, advanced modes of transportation (such as all-terrain vehicles), updated firearms, and various technological aids which generally improved

²² C.H.D. Clarke, “Reflections on game laws,” *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 30.

²³ *Ibid.*, 87.

²⁴ “Modern training for conservation officers,” *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 15-18; Fisher, 88.

²⁵ “Editorial,” *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 1.

COs' operational capacity.²⁶ Unsurprisingly, convictions for wildlife offences in Ontario gradually increased during the 1970s, going from 5,103 in 1972-73 to over 8,300 in 1978-79.²⁷

Throughout the 1970s, Ontario's COs came into contact with a wide variety of illegal activities while patrolling the province's vast landscape. Poaching was likely the most pressing problem they encountered. According to one observer, "nothing galvanizes a C.O. more than the prospect of catching wildlife thieves red-handed. Historically, game wardens have always been the arch enemy of the poacher, whose greatest dread is the strident cry, 'game warden!'"²⁸ In the mid-1970s, for instance, a ring of deer poachers was wreaking havoc on Manitoulin Island, with the MNR estimating that 500 to 900 deer were killed illegally in the area in 1976 alone. However, through close collaboration with the public, local conservation officers were able to reduce significantly the number of poached deer on Manitoulin, as only 34 cases were reported in 1977.²⁹ Similarly, in September 1978 a CO apprehended and charged a party of four hunters for killing two moose during the closed season just north of Cochrane. The hunters ultimately paid over \$3,000 each in fines, and had their meat and firearms seized (though the latter was eventually returned to them).³⁰ Even in more urban areas like the city of Toronto conservation officers dealt with comparable crimes, ranging from illegal sport fishing to the trapping of wild songbirds for sale as pets.³¹

Of course, since the job cannot by its very nature be dissociated from danger, COs often found themselves in hazardous and even life-threatening situations. Harsh weather conditions,

²⁶ Fisher, 41-55.

²⁷ *Ministry of Natural Resources: Annual Report (1972-73)*, 10; *Ministry of Natural Resources: Annual Report (1978-79)*, 23.

²⁸ Fisher, 71.

²⁹ R.T. Matz, "Deer poaching on Manitoulin Island," *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 19-20.

³⁰ C.E. Monk, "The anatomy of poaching," *Ontario Fish and Wildlife Review* 17, no. 3 (1978), 3-10.

³¹ Allan Wainio, "Toronto C.O. Tough Urban Patrol," *Aski* 2, no. 5 (1973), 4.

faulty machinery, and human violence have traditionally posed the biggest threats to those working out in the field. For example, in the spring of 1978 two conservation officers nearly died when their float plane faltered and crashed into Whiteclay Lake, located over 300 kilometres north of Thunder Bay. Thankfully, the two men were able to escape the sinking aircraft and swim to the surface before it was too late.³² While accidents of this kind were relatively rare, nearly every CO in the province has dealt with aggressive perpetrators, some of whom go as far as to intimidate or attack officers who try to hold them accountable for their illicit behaviour. One of the more extreme incidents of this type occurred in the late 1970s when a conservation officer in the Espanola area found himself at the centre of murder plot after tipping off the OPP about a local network of weapon traffickers. The OPP was luckily able to arrest the culprits before they could execute their plot, and they were eventually sentenced to six years in prison for conspiring to commit murder.³³

The 1980s was an eventful decade for the MNR in general and its conservation officers in particular. Building upon the trends and successes of the previous decade, the Ministry pushed ahead with its mandate to administer Ontario's forests, lands, waters, wildlife, and fish in a sustainable, progressive manner, and it actively encouraged both the public and its COs to become more involved with facilitating this process.³⁴ In this capacity, conservation officers were expected to provide more information, advice, and guidance to ordinary citizens as they navigated both the natural and legal channels of Ontario's natural resource sector. While this has always been a defining characteristic of the COs work, the Ministry placed a renewed emphasis on it during this decade in order to promote a better public understanding of resource

³² Fisher, 65-66.

³³ Ibid., 60.

³⁴ *Ministry of Natural Resources: Annual Report (1981)*, 5; *Ministry of Natural Resources: Annual Report (1982)*, 4.

management issues in general.³⁵ At the same time, both the MNR and its conservation officers ramped up their efforts to identify and penalize individuals who knowingly and willingly disregarded Ontario's wildlife laws. As a result, COs became increasingly prominent figures within the Ministry and province at large.

The size and demographic composition of the Ministry's team of conservation officers also underwent noticeable changes during the 1980s. Up until this point, only men had worked as COs in Ontario, and they were almost exclusively of white, Euro-Canadian heritage. In 1980, however, Margaret Reed was hired as a conservation officer in the Chatham District, marking the first time in the province's history that a woman held the position.³⁶ This decision was undoubtedly a triumph for the MNR, as it had been working diligently to increase the number of women within all levels of its administration from the mid-1970s onward. In fact, the Ministry identified Reed's hiring as "a definite milestone" for gender equality within its ranks.³⁷ Over a roughly ten-year period, the MNR not only hired more women but also increased the overall number of COs in Ontario by about 20 percent, reaching a total of 257 by the late 1980s.³⁸

The introduction of new technologies and training techniques enhanced the working experience of Ontario's expanding ranks of conservation officers during this period. Prior to 1980, for instance, the Ministry offered no official firearms training for its COs, who were largely expected to educate themselves with the help of their local OPP detachment. The MNR eventually began requiring conservation officers to complete annual testing to demonstrate basic marksmanship skills, and in 1983 even began granting awards to the most proficient officers.

³⁵ *Ministry of Natural Resources: Annual Report (1986-87)*, 72.

³⁶ Fisher, 88.

³⁷ *Ministry of Natural Resources: Annual Report (1981)*, 54.

³⁸ *Ministry of Natural Resources: Annual Report (1989-90)*, 26.

Then, in the late 1980s, self-defence batons were added to the COs' repertoire, and these, too, became the subject of yearly performance reviews. On the other end of the educational spectrum, in 1982 the Ministry instituted stress management courses for conservation officers in an attempt to address the difficulties associated with, among other things, "facing armed violators, verbal aggression and lack of empathy for resource users, [and] perceived inequalities in the judicial system." Outside of the classroom, COs simultaneously gained access to a plethora of cutting-edge enforcement equipment. Highly sophisticated moose, deer, and bear decoys proved to be particularly useful when tracking down illegal hunters, especially in the 1989 hunting season when these were used in a series of arrests across the province. Electronic tracking devices, as well as live and remote surveillance photography, also emerged as indispensable tools for conservation officers around this time.³⁹

Armed with high-tech equipment and a more refined skillset, conservation officers were front and centre in the Ministry's campaign to crack down on illegal hunting and fishing practices throughout the 1980s. Between 1985 and 1989, COs laid tens of thousands of charges under various provincial and federal regulations relating to Ontario's wildlife resources, and collected over \$2 million in fines from people convicted of violating these laws.⁴⁰ Most notably, in the mid-1980s the province's conservation officers were directly involved in "'Operation Falcon,' ... one of the largest wildlife law enforcement initiatives ever launched in North America." The investigation, which had begun in the late 1970s, uncovered a multi-million dollar international black market for endangered bird species such as peregrine falcons and

³⁹ Fisher, 45; 50-52; 89-92.

⁴⁰ *Ministry of Natural Resources: Annual Report (1985)*, 45; *Ministry of Natural Resources: Annual Report (1986)*, 64; *Ministry of Natural Resources: Annual Report (1987)*, 72; *Ministry of Natural Resources: Annual Report (1989)*, 24.

gyrfalcons. After raiding nests across North America and Europe, poachers were smuggling eggs and newly hatched birds into Ontario and then exporting them illegally to buyers abroad, namely in Saudi Arabia and the Persian Gulf States. Ontario's COs were at the helm of the investigation from start to finish, culminating in a collaborative operation with American officials in June 1984 which resulted in over 80 charges being laid against 35 people in both Canada and the United States.⁴¹

When they were not busy combating illegal activities in Ontario's wilderness, enforcement officers could often be found promoting the merits of environmental conservation among the general public. In fact, the MNR as a whole strove to build a stronger relationship with the people of Ontario throughout the 1980s, and in this regard COs proved to be valuable assets.⁴² For example, conservation officers regularly visited schools, conservation clubs, public hearings, fairs and exhibitions across Ontario in order to relay the Ministry's message of sound resource management to ordinary citizens.⁴³ Moreover, COs emerged as essential partners in Ministry initiatives such as National Wildlife Week, the Community Wildlife Involvement Program, and the Community Fisheries Involvement Program, as well as for public organizations such as the Ontario Federation of Anglers and Hunters (OFAH) and the Federation of Ontario Naturalists (FON). By spreading conservationist thinking across the province and fostering closer ties between Ontarians and the MNR, conservation officers demonstrated "that active

⁴¹ Wayne Mutton, "Cleaning up the laundry: How our COs cracked an illegal falcon trading ring," *Aski* (December 1984), 15-17; *Minister of Natural Resources: Annual Report* (1985), 45.

⁴² *Minister of Natural Resources: Annual Report* (1981): 5; *Minister of Natural Resources: Annual Report* (1982): 4.

⁴³ *Ministry of Natural Resources: Annual Report* (1987), 72; *Ministry of Natural Resources: Annual Report* (1989), 24.

cooperation is not only a boon to enforcement and resource management, but also a wise investment in ... the land, waters, fish and wildlife of Ontario.”⁴⁴

The 1980s also saw the Ministry begin to reconsider the role of COs in Ontario’s natural resource sector. As mentioned previously, conservation officers became tasked with many new management-related duties in the immediate postwar era, and this partly hampered their ability to focus on standard enforcement protocol. By the early 1980s, however, a debate had emerged within the MNR regarding the division between COs’ management and enforcement responsibilities. In 1980, for instance, two Ministry staff, enforcement specialist Dale Gartley and biologist Blair Dawson, tabled the *Gartley-Dawson Report*, which “called for the continued integration of management and enforcement duties” while also stressing that the former essentially depended upon the success of the latter. In a similar vein, another MNR report released in 1987 recognized the importance of enforcement but “urged against the trend towards full-fledged policing.” Nonetheless, many of Ontario’s COs still viewed enforcement - which by 1990 occupied approximately 85 per cent of their time on the job - as their central function. This shift in thinking had clear implications, with the number of charges laid by COs in 1990 reaching nearly 18,000, while fines issued that year totalled over \$1 million. As one retired MNR enforcement specialist put it, “by enforcing the laws, COs *are* managing the resources. Sometimes, the only management we have is enforcement.”⁴⁵

The 1990s marked a watershed in the history of the province’s enforcement officers. A major pay raise was the most obvious indicator of this phenomenon. COs had long expressed discontent over their salaries, which they alleged were meagre compared to other enforcement

⁴⁴ Fisher, 99-105.

⁴⁵ *Ibid.*, 35-38.

agencies, but the situation began approaching its boiling point in 1979 with the formation of the Ontario Conservation Officer's Association (OCA). A non-profit, non-union organization for active and retired Ontario COs and other natural resources law enforcement officers, upon its creation the OCA immediately began lobbying for a wage increase. Finally, in April 1990, Ontario's 250 COs received a nearly twenty-five per cent raise and a reclassification of their duties, at the time, making them the third highest paid wildlife enforcement officers in North America.⁴⁶ That same year, the MNR formed the Compliance Policy Branch in response to the "increasing need for, and public expectation of, more effective enforcement of provincial laws and regulations governing natural resources" and out of recognition "that the achievement of sustainable development is only possible if there is compliance with the principles, practices, rules and regulations of conservation and social responsibility."⁴⁷ Naturally, COs were expected to play a leading role within the new branch, which clearly reflected both the provincial government's and the public's growing concern for environmental protection. In 1992, Ontario's conservation officers received a further boost in morale with the celebration of their centennial anniversary, a milestone which the Ministry made sure to commemorate to the fullest. A number of special events were planned throughout 1992 in honour of the event, and the MNR even commissioned the publication of a commemorative book entitled *Game Wardens: Men and Women in Conservation*, by Joe Fisher.⁴⁸

The Ministry made a concerted effort to enhance the enforcement capabilities of its conservation officers throughout the 1990s. In November 1991, for instance, the MNR

⁴⁶ "Province's conservation officers get 24.5% raise, retroactive pay," *The Globe and Mail*, 3 April 1990, page C6; Fisher, 54-55.

⁴⁷ *Ministry of Natural Resources: Annual Report (1990-1991)*, 13.

⁴⁸ *Ministry of Natural Resources: Annual Report (1991-1992)*, 15.

announced its intention to become more involved with the Crime Stoppers program, thereby allowing COs and other Ministry staff to access more information regarding possible violations of game and fish regulations and other natural resource laws.⁴⁹ In addition, shortly thereafter the MNR unveiled Ontario's "Interim Enforcement Policy," which recognized the constitutional hunting and fishing rights of Canada's Indigenous community and provided "guidance to provincial enforcement staff and others in cases where aboriginal peoples may be in conflict with provincial game and fish laws."⁵⁰ This had occurred in the wake of the controversial 1990 "Operation Rainbow," which saw 67 conservation officers lay over 300 charges under the *Game and Fish Act* against 35 people, the majority of whom were Indigenous peoples who argued that they had been acting within their treaty rights. After a seven-year-long court battle, all of the accused had either paid a fine, been sentenced to two years' probation, or had passed away before a verdict could be rendered.⁵¹ By the late 1990s, the MNR was championing a three-pronged approach to achieving high rates of compliance in Ontario: information and education; resource monitoring and inspection; and law enforcement. Of course, all of this required the full cooperation of the province's COs to be carried out effectively.⁵²

Since the turn of the century, Ontario's conservation officers have been able to use the lessons of the past to build a brighter future for the province's wildlife resources. Technological advancements, upgraded training, an environmentally-conscious citizenry, and stronger legislative support have all allowed modern-day COs to better protect and conserve Ontario's

⁴⁹ *Ministry of Natural Resources: Annual Report (1991-1992)*, 15.

⁵⁰ *Ministry of Natural Resources: Annual Report (1991-1992)*, 15.

⁵¹ "Crown turns down Indian offer," *The Globe and Mail*, 10 January 1996; "Natives livid about sting operation," *The Globe and Mail*, 17 January 1996; "Poachers get probation in seven-year-old case," *The Globe and Mail*, 28 June 1997, page A3.

⁵² *Ministry of Natural Resources: Business Plan (1996)*, 7; *Ministry of Natural Resources: Business Plan (1997-98)*, 9.

natural resources. More specifically, conservation officers can investigate and prosecute offenders under numerous federal and provincial statutes, and have substantial legal authority which allows them to act swiftly when encountering illicit activities. Furthermore, COs continue to offer friendly advice to ordinary Ontarians regarding relevant laws and regulations, public safety, and environmental health. The creation of the Enforcement Branch in 2005 was also a significant advancement as it allowed for efficiencies in funding and equipment, and meant that officers reported to a Branch Director rather than a local District Manager. The current stature of enforcement officers in Ontario's resource sector cannot be overstated. In 2015 alone, for example, conservation officers laid nearly 3,000 natural resource charges, and spent over 8,900 hours educating the public on various elements of conservation and safety measures.⁵³ As resource ambassadors, public relations specialists, and irreplaceable enforcers of the law, COs have undoubtedly solidified themselves as the guardians of Ontario's natural resources.

In more recent years, the Ministry of Natural Resources and Forestry (MNRF) – a title it formally adopted in 2014 – has offered various means of support to its conservation officers as they work to encourage compliance with Ontario's natural resource laws, and together these two parties have been remarkably successful in this regard.⁵⁴ Indeed, the rate of compliance with natural resource laws and regulations in Ontario has hovered consistently around 92 to 94 per cent since 2003.⁵⁵ New technologies and innovations have, as always, played an essential part in this process. In 2010-11, for instance, the Ministry installed “mobile offices” in 102 conservation

⁵³ “Conservation officer powers and authorities,” *Government of Ontario*, <https://www.ontario.ca/page/conservation-officer-powers-and-authorities> (accessed 16 March 2017).

⁵⁴ “Ontario Ministry of Natural Resources adds forestry to its title,” *CBC News*, 14 July 2014, <http://www.cbc.ca/news/canada/sudbury/ontario-ministry-of-natural-resources-adds-forestry-to-its-title-1.2706127> (accessed 4 April 2017).

⁵⁵ *Ministry of Natural Resources: Results-based Plan* (2009-10), 33; *Ministry of Natural Resources: Results-based Plan* (2012-13), 11.

officers' trucks in order to "give full desktop functionality in the field, increasing efficiency and improving records management."⁵⁶ Moreover, in order to strengthen its enforcement capacity, in 2009-10 the Ministry hired five new enforcement officers to increase ground, air and boat patrols. It also added three canine services teams to help its COs inspect, enforce, educate and collaborate with other agencies.⁵⁷

For well over a century, conservation officers have been the last line of defence against those who, either unintentionally or purposefully, pose a threat to the vitality of Ontario's abundant natural resources. While many aspects of the job - technological, social, legal, and more - have changed over the course of time, its underlying premise has remained the same. From the humble beginnings of the province's first game wardens to the modern COs we know today, these individuals have always demonstrated an unwavering commitment to safeguarding Ontario's lands, waters, and wildlife. Since 1972, conservation officers have been integrated into an organization which upholds these same principles as its guiding managerial philosophy. Indeed, under the MNRF conservation officers have definitely enjoyed a steady improvement in their working conditions and public image, and this trend will only continue as Ontario confronts the challenges facing our planet. In the words of Fisher, "the past 100 years have been a rough and tumble century of hardship and achievement. Conservation officers have, nonetheless, emerged from the fray with pride, confidence and a great deal of respect."⁵⁸

⁵⁶ *Ministry of Natural Resources: Results-based Plan* (2010-11), 32-33; *Ministry of Natural Resources: Results-based Plan* (2012-13), 11.

⁵⁷ *Ministry of Natural Resources: Results-based Plan* (2009-10), 33.

⁵⁸ Fisher, 39.