



Upper Fraser Fisheries Conservation Alliance

Marine Stewardship Council – Regional Office, Americas
Attn: Dan Averill
2110 North Pacific Street
Suite 102
Seattle, Washington 98103
USA

Via Email

RE: British Columbia Sockeye Salmon MSC Certification Process

Dear Mr. Averill,

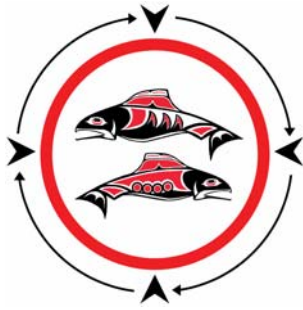
The Upper Fraser Fisheries Conservation Alliance (UFFCA) commends the Marine Stewardship Council's Vision and Mission statements with respect to rewarding and promoting sustainable fisheries to safeguard seafood supplies for future generations. However, the UFFCA has serious concerns with regard to the MSC's on-going assessment of the BC Sockeye Salmon fishery, on behalf of your client, the BC Salmon Marketing Council.

The BC Salmon Marketing Council represents the harvesters and processors of commercially caught BC salmon. In order to assess whether or not a commercial fishery is sustainable in BC, and in this particular case the sockeye fishery, an examination and assessment of the performance of all sockeye management priorities must occur. The priority order of management for BC sockeye salmon, as outlined by Canada's legal framework is as follows:

- 1) Conservation requirements
- 2) First Nations Food, Social, and Ceremonial fisheries requirements
- 3) Other uses such as Commercial and Recreational harvest

The UFFCA works with approximately 23 First Nations in the Upper Fraser River, and is governed by a First Nations Board selected from the main geographical regions of the Upper Fraser. The Upper Fraser area as defined by the UFFCA is

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the area upstream of Deadman Creek to the Fraser River headwaters and its tributaries. This is an area that encompasses the spawning and nursery grounds for Early and Late Stuart, Bowron, Nadina, Stellako, Taseko, Quesnel, and Chilko sockeye stocks. Yet despite the production capability and diversity of sockeye stocks in this area, conservation concerns and the lack of fulfillment of Food, Social and Ceremonial (FSC) fishery needs has become a major issue to many who are involved in the management of these fish.

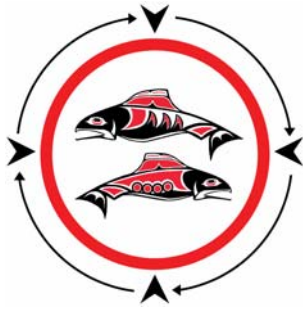
Utilizing the priority management framework outlined previously, a reasonable process for determining the sustainability of a commercial fishery would first have to assess the performance of conservation requirements and FSC fisheries. According to the information that the UFFCA and Upper Fraser First Nations have reviewed and completed with respect to escapement estimates and catch monitoring, neither of the first two management priorities is sustainable within the current management system.

The current management system for Fraser sockeye relies on an aggregate-based system that does not offer adequate protection of less productive and/or weak sockeye stocks co-migrating with more productive or stronger stocks. Allowable catch is determined at aggregate levels, and this is a system that allows mixed-stock harvest (based on timing and abundance) to occur on an aggregate, despite stock-specific conservation concerns within that aggregate. Escapement targets are also based on these same aggregates, which allow stronger escapements in some systems to offset weaker escapements in others.

The UFFCA has long advocated the need for stock-by-stock management to redress the management issues associated with differential Fraser sockeye productivity. In fact, DFO has taken steps to improve on the existing management system with its Wild Salmon Policy, but this policy has not been made operational yet. The UFFCA believes that the proper implementation of DFO's Wild Salmon Policy could address many of the mixed-stock management issues. However, the aggregate group and timing management regime continues to be utilized, to the detriment of less productive sockeye stocks, and the ecosystem as a whole.

The UFFCA is also concerned about the process of Fisheries Assessment described by the Tavel Certification Inc. document outlining the transition of

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Certification Bodies for the BC Sockeye fishery (available for download at the MSC website). In that document, it is apparent that although a re-scoring of the BC Sockeye Salmon fishery (by the expert team) will occur in order to include more recent changes and information pertaining to the BC sockeye fishery. The document states that the re-scored fishery will go directly to peer-review and production of a final report. According to the presentation given on August 27th by the MSC, the process for certification at the scoring stage would result in a Draft report and opportunity for stakeholder input at the peer review stage. The process outlined in the transition of Certification Bodies document does not follow this standard, and the UFFCA does not find it acceptable that a final report be produced after peer review without the opportunity for stakeholder input.

The UFFCA requests the following:

- That the MSC provide immediate response with regard to the concerns expressed in this letter
- That the MSC provide the opportunity for the UFFCA, and Fraser First Nations, to provide input and comment on the re-scored BC Sockeye Fishery Assessment prior to the peer-review stage

The UFFCA looks forward to your timely response with regard to these important issues, and welcomes a discussion of these issues in more detail, and at your earliest convenience.

Sincerely,

Marcel Shepert, Chairperson and Facilitator, UFFCA

Cc:
UFFCA Board of Directors
Mr. Steven Devitt, Tavel Certification Inc.
Mr. Paul Sprout, Regional Director General, DFO, Pacific Region
Fraser River First Nations
BC, First Nations Fisheries Council

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