

From: Antcliffe, Bonnie <Bonnie.Antcliffe@dfo-mpo.gc.ca>
Sent: Wednesday, October 1, 2008 5:46 PM
To: Ryall, Paul <Paul.Ryall@dfo-mpo.gc.ca>; XPAC FM RM Area Chiefs <pacfmrmareachiefs@pac.dfo-mpo.gc.ca>; Logan, Gary <Gary.Logan@dfo-mpo.gc.ca>; Mylchreest, Russell <Russell.Mylchreest@dfo-mpo.gc.ca>; Gill, Harpreet <Harpreet.Gill@dfo-mpo.gc.ca>
Subject: FW: National Precautionary Approach framework follow-up teleconference

For those who want to join in,

The call in number is the same as today
1-866-792-1316 Code 4106596

From: Antcliffe, Bonnie
Sent: October 1, 2008 1:19 PM
To: Ryall, Paul; XPAC FM RM Area Chiefs; Logan, Gary; Gill, Harpreet; Mylchreest, Russell
Cc: Farlinger, Susan; Hardacre, Kim
Subject: FW: National Precautionary Approach framework

Please find attached some information from Science in preparation for and in follow-up to today's call on the Precautionary Approach (PA). Ted Perry has requested a meeting with Science tomorrow from 11 to noon to further discuss the proposed wording in the PA, particularly around the first issue that was raised - How does the PA apply to multi-species or multi-stock fisheries, fisheries on stock complexes or by-catch?

In the email notes below Science is saying that the PA can be applied directly in multi-species or multi-stock fisheries and to by-catch - not just to target stocks. I plan to be on the call but would like to ask if others from FAM would like to join in, or provide views on this aspect. I will circulate the new proposed wording from NHQ later today once I get it.

Please let me know if you would like to participate on this call and I will forward the call-in number.

Bonnie

From: Perry, Ted
Sent: October 1, 2008 12:59 PM
To: Antcliffe, Bonnie
Subject: FW: National Precautionary Approach framework

You might want to circ to FAM players.

Ted

-----Original Message-----

From: Kronlund, Allen
Sent: Friday, September 26, 2008 10:16 AM
To: Sinclair, Alan (Pacific); Perry, Ted; XPAC SC MEAD Section Heads; Riddell, Brian (Pacific)
Cc: Kronlund, Allen
Subject: RE: National Precautionary Approach framework

Hello all:

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I have noted much focus in this thread, and in various meetings, on the harvest control rule first identified by DFO (2006) and then utilized in the Resource Management Sustainable Development Framework. Many folks appear to confuse the "PA" with the harvest control rule. However, the control rule is one component of the management system comprised of a procedure (e.g., data + assessment method + control rule) and the prospective evaluation of the adequacy of the management system by comparison of performance measures against measurable fishery objectives.

Part of the answer to question 1 below relates to being clear about the fishery objectives. The "PA" applies equally well whether there is one stock or many. The difficulty is that we have some capacity building to do within DFO and with stakeholders to learn how to define measurable fishery objectives for a multi-species or multi-stock situation. The lessons from salmon indicate that the total yield from a mix of stocks is less than the sum of the individual single-stock yields, and development of the Wild Salmon Policy indicates how difficult it is to grapple with stating the objectives. Similar lessons apply to our multi-species groundfish fisheries. Furthermore, being clear about what is desired in terms of measurable objectives across the species in a multi-species fishery is as close as we are likely to come to making "eco-system" management operational. For example, focus on maximizing harvest from the more productive stocks will inevitably result in over harvest of weaker stocks. The goal is to make those trade-offs explicit in order to inform decision-makers. The job of Science Guys is to make these trade-offs clear and describe the risk in the face of uncertainty which will never go away. As Sinclair points out below, there is a host of international/national agreements that provide guidance on the conservation axis, and fishery managers and stakeholders need to weigh in on the yield and volatility axes (as described by the Framework).

Bycatch should by now be a meaningless word, at least for the west coast groundfish fisheries in part because of Groundfish Integration. There is catch by species. Our problem is to develop measurable objectives for our multi-species fisheries because the FAO (1995) document, COSEWIC, SARA, etc apply regardless of whether the species is sablefish or spotted ratfish. Indeed the Framework applies regardless of species.

Al Sinclair's suggestion is fine, but I wondered what process will be followed to review the Framework doc prior to considering it finalized. The Framework dates back to at least March 2007. I am unaware if the PA working group reviewed the doc, since my first interaction with the group in early Sept. was focused on control rules for shrimp. For example, part of the existing March 2008 draft is simply wrong since application of the PA is not dependent on the level of uncertainty, e.g., "In fisheries, the PA is about being cautious when scientific information is uncertain, unreliable or inadequate and not using the absence of adequate scientific information as a reason to postpone or fail to take action to avoid serious harm to a stock."

The Framework contains many good concepts and useful policy guidance - I was happy to see it emerging - my point is that a pre-finalization review might be warranted.

Regards, Rob Kronlund

From: Sinclair, Alan (Pacific)
Sent: September 25, 2008 1:31 PM
To: Perry, Ted; XPAC SC MEAD Section Heads; Riddell, Brian (Pacific); Kronlund, Allen
Subject: RE: National Precautionary Approach framework

I think Marc's reply to the first question is a little restricted with respect to the intent and content of the PA Framework. I've drafted the following response using much of his original text. The main difference is that the PA framework can be applied directly in multi-species or multi-stock fisheries and to by-catch.

A1. Measures to minimize impacts on non-target species have been used in Canadian fisheries for some time, driven by the need to meet conservation obligations under the Fisheries Act, SARA and international commitments such as CITIES, UNFA and the FAO Code of Conduct regarding the conservation and management of these species and stocks. The national PA framework applies to all stocks affected by fishing. The intent is to assess the status of the stock relative to the stock status benchmarks (LRP, USR) and the removal reference. The removal reference applies to all human induced mortality, whether as directed catch, by-catch, or the result of a non-fishing activity. The application of harvest decision rules for a target stock may need to be tempered to limit effects on non-target species if the non-target species are in the cautions or critical zones, or if the removal rate is above the removal reference. Thus, the PA policy provides guidance on the management of non-target stocks and multi-species fisheries. For the management of Pacific salmon, where the question of how to manage stock complexes of weak and strong population is central, the Pacific WSP outlines a comprehensive framework for management.

Alan Sinclair

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-----Original Message-----

From: Perry, Ted
Sent: September 25, 2008 10:37 AM
To: XPAC SC MEAD Section Heads; Riddell, Brian (Pacific); Sinclair, Alan (Pacific); Kronlund, Allen
Subject: FW: National Precautionary Approach framework

I will follow up later today re meeting on this.

Ted

-----Original Message-----

From: Antcliffe, Bonnie
Sent: Thursday, September 25, 2008 8:56 AM
To: XPAC FM RM Area Chiefs; Perry, Ted; Brown, Laura (Pacific); Boutillier, James; Riddell, Brian (Pacific); Wright, Steven; Ryall, Paul; Grout, Jeff; Mylchreest, Russell; Gill, Harpreet; Logan, Gary

Cc: Annand, Chris; Farlinger, Susan; Clemens, Marc; Gilchrist, Brett; Hardacre, Kim

Subject: FW: National Precautionary Approach framework

At recent DMC briefings, Pacific Region has asked for clarification on two aspects of the Precautionary Approach (PA), as follows:

1. How does the PA apply to multi-species or multi-stock fisheries, fisheries on stock complexes or by-catch?
2. What is the purpose of listing the provisional reference points and decision rules found in Annex 1b?

NHQ has drafted a response to these questions (see below). I would like to arrange a conference call with Science and FAM to discuss these responses and work with NHQ to arrive at agreement on the most appropriate wording to use in the document to respond to these questions. There is some urgency to this as there is a need to finalize the policies very soon. The proposed date for the conference call is Oct. 1 at 10 am Pacific Time.

Marc Clemens and Dave Gillis will be on the call from NHQ, and Chris Annand (Director, RM Maritimes Region) has been invited. It is important to have representation from both FAM and Science in Pacific Region on this call and I would appreciate hearing back regarding who will be participating on this call. I can collate and forward comments for those unable to attend. If necessary, we can look at changing the date and time for the call but there is a need to do this by mid-next week.

I will have this note circulated as a meeting request that includes the conference call in number.

Thanks,

Bonnie Antcliffe

Director, Resource Management
Fisheries and Aquaculture Management
Fisheries and Oceans Canada
200-401 Burrard Street
Vancouver, BC V6C 3S4
Office: (604) 666-6931
Facsimile: (604) 666-9136
Cell: (604) 209-1385
E-Mail: Bonnie.Antcliffe@dfo-mpo.gc.ca

From: Clemens, Marc
Sent: September 24, 2008 3:51 PM

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To: Antcliffe, Bonnie
Cc: Gillis, Dave
Subject: National Precautionary Approach framework

Bonnie,

As discussed, in and around recent DMC briefings about finalizing the new policies under the Resource Management Sustainable Development Framework, two questions were raised related to the scope and content of the national PA policy. I've noted the questions below and provided responses. Also, attached is the PA policy with proposed edits to address these two questions (see pages 1, 5, 7, page 10 - the title in Table 1 and pag13 - Annex 1b).

I would like to arrange a teleconference with representatives from Science and Fisheries Management in Pacific Region to try to arrive at an agreement on the most appropriate wording to use in the document to respond to these questions. There is some urgency to do this as there is a need to finalize the policy. I should also note that when this policy is finalized and posted on the DFO website, along with the policies on Sensitive Benthic Areas and Forages species, they will be accompanied by a brief description of each policy, their scope and a description of the general implementation approach (i.e. in a stage manner, over time, based on regional priorities, through regional IFMP processes) as a way to try to address expectations about timelines and implications.

Q1. How does the PA framework apply to multi-species or multi-stock fisheries, fisheries on stock complexes or by-catch?

A1. The national PA framework provides an approach for implementing a PA framework for target species or stock(s) harvested in a fishery, that is, those stocks that are the intended targets of the harvesting activity, whether the target is a single stock or a number of stocks. It wasn't envisioned that this policy would apply to stocks intercepted during the harvesting of a target stock or stocks, whether these intercepted or non-target stocks were retained or released/discarded. This doesn't mean that non-target stocks are to be disregarded when a PA framework, under this policy, is applied to a target stock. The application of harvest=decision rules for a target stock may need to be tempered to limit effects on non-target species. But the PA policy does not provide guidance on the management of non-target stocks using a PA approach. While there is currently no national policy on by-catch, measures to minimize impacts on non-target species have been used in Canadian fisheries for some time, driven by the need to meet conservation obligations under the Fisheries Act, SARA and international commitments such as CITES, UNFA and the FAO Code of Conduct regarding the conservation and management of these species and stocks. For the management of Pacific salmon, where the question of how to manage stock complexes of weak and strong population is central, the Pacific WSP outlines a comprehensive framework for management. Finally, it is recognized that there is a need for a companion framework or policy to this PA framework to provide a nationally consistent approach to the management of non-target stocks. The plan is to do this through the development of a national by-catch policy in the near future.

Q2. What is the purpose of listing the provisional reference points and decision rules found in Annex 1b?

A2. The purpose of this annex is to conclude the policy framework by moving from the general to the specific and strengthen the overall guidance provided in the document. Without this annex the policy lacks any reference to specifics, i.e., concrete examples - about the nature of reference points that would be consistent with the policy's intention. These guidelines are provided as:

1) indicative of how reference points should be generally characterized against stock status, where other metrics or methods are available and may be more appropriate. As an example, an LRP may be chosen that uses another metric other than biomass or that is lower than the provisional LRP, $biomass \leq 40\% B_{MSY}$. This is acceptable as long as there is justification that the LRP adequately represents the stock status below

which serious harm is occurring to the stock.

2) provisional reference points where currently other metrics for reference points are not available. As "provisional reference points", they are offered as the best available guidance until other reference points are developed for a stock or fishery. It is not the intent that reference points and the policy will be implemented overnight, rather that this will be done in a staged and adaptive manner over several years. However, the aim is also not to wait an excessive amount of time trying to identify and develop reference points before they are put in place but avoid excessive delay and use the provisional reference points, in the meantime, as a best choice alternative. Priorities for implementation in fisheries will be set by Regions based on factors such as conservation need, market pressures (certification), resources, input from national headquarters and fishery stakeholders, etc.

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Marc