

Marine Conservation Caucus  
Attn: Mr. Ken Wilson, Mr. Craig Orr and Mr. Jeffrey Young  
1037 Madore Avenue  
Coquitlam, BC  
V3K 3B7

Dear Sirs,

**RECOMMENDATIONS FROM THE MARINE  
CONSERVATION CAUCUS ON THE SOUTH COAST  
SALMON INTEGRATED FISHERIES MANAGEMENT PLAN**

My sincere apologies for the extremely tardy response to your letter dated March 4, 2009 on the MCC's recommendations on the South Coast Salmon Integrated Fisheries Management Plan (IFMP). While we discussed these issues at our meeting on March 23, 2009, I am providing this letter as a record of the Department's responses to your recommendations. In addition, I would like to thank the MCC for the thoughtful advice it has provided to the Department on the IFMP. Your comments and recommendations were taken into consideration during the drafting of the IFMP and I can offer the following response to the points raised.

*Wild Salmon Policy (WSP) Implementation:*

The Department continues to move forward with implementation of the Wild Salmon Policy (WSP). In January 2009, the Department reviewed a paper on *Indicators of Status and Benchmarks for Conservation Units in Canada's Wild Salmon Policy*. Although considerable work remains to be done in relation to this topic, this paper is an important step forward as it provides a toolkit of biological metrics for assessing populations and benchmarks along those metrics. This will set the stage for improving the transparency and consistency of future assessments of the health of Pacific salmon conservation units. Progress on implementing the WSP can also be tracked on the Department web page:

<http://www.pac.dfo-mpo.gc.ca/fm-gp/species-especes/salmon-saumon/wsp-pss/news-nouvelles-eng.htm>

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*Recommendation 1: At minimum, all salmon CUs should be identified with whatever information on status is available. Objectives as they relate to CUs should be stated. For CUs without information on status this lack of information should be clearly articulated. This reporting could be achieved as an upgrade of the now out-of-date salmon outlook reporting on various stock groupings.*

While CUs have been established (see [http://www.dfo-mpo.gc.ca/CSAS/Csas/Publications/ResDocs-DocRech/2007/2007\\_070\\_e.htm](http://www.dfo-mpo.gc.ca/CSAS/Csas/Publications/ResDocs-DocRech/2007/2007_070_e.htm)), considerable work remains to be done to collate all of the relevant information on status. The methodology to evaluate the biological status of the CUs is currently being finalized and this will provide an array of potential metrics for assessing CUs. Additional work will be required to complete development of benchmarks for individual CUs and assess their status. The Department is currently reviewing our work plan for moving ahead with WSP implementation. I expect that we will shortly have additional specific items to discuss with you and others on how we will be continuing our WSP implementation.

*Recommendation 2: Use the 75p cumulative probability forecast for planning 2009 fisheries. Beyond 2009 undertake a technical process that reduces the prevalence of forecasting for pre-season planning and design effective in-season management tools that are precautionary and ensure escapement goals for CUs are met.*

The Department has reviewed this request and agrees that in some cases the adoption of the 75p forecast may be warranted. In 2009, the Early Stuart sockeye management plans will be based upon the 75p forecast of 165,000 until an in-season run size is adopted by the Fraser River Panel (FRP). In recent years, the forecast model has had a tendency to over-estimate true returns and actual returns have more closely tracked the 75p cumulative probability forecast. In this case, the adoption of a more precautionary approach is warranted.

Pre-season forecasts of run size at a range of probability levels may be used to guide development of pre-season harvest plans. However, fishing opportunities are identified based on in-season run size estimates derived from information from test fishing operations, catches during commercial and other fishery openings, and hydro-acoustic estimates of abundance at the PSC hydro-acoustic facility at Mission, BC which are provided by the PSC staff to the FRP for consideration. The FRP will meet regularly from late June to mid September to review the in-season information as it becomes available over the course of the sockeye and pink migration and run size estimates will be regularly updated through the FRP process.

*Recommendation 3: Use a TAM rule for the late run aggregate that includes a no fishing point. Alternative approaches, including the proposed 20% fixed exploitation rate, are intentionally over-fishing CUs at risk, including Cultus Lake Sockeye.*

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The Department proposed a 20% fixed exploitation rate in the draft IFMP similar to what has been in place for the last two years for Cultus sockeye. The 20% exploitation rate ceiling has been combined with enhancement activities (e.g. traditional fry and smolt releases and a captive brood program) and freshwater improvements (e.g. pike minnow removal) as part of comprehensive recovery measures for the Cultus Lake sockeye population. This approach will be reviewed as part of the workshops to review the Fraser River Sockeye Spawning Initiative being planned for the fall of 2009.

*Recommendation 4: Continue to manage timing aggregate overlap explicitly. Do NOT use a "10/10" rule where fisheries can proceed if co-migrating aggregates are less than 10% of the total abundance and less than 10% of the smaller aggregate is exposed to the fishery. This approach intentionally fishes beyond TAC and into escapement and/or First Nations FSC fish. TAC of less productive aggregates should be reserved to allow fishing of stronger aggregates during periods of overlap, without fishing in to escapement.*

The in-season management of Fraser River sockeye takes into account a broad range of information to regularly reassess the in-season run size estimates for Fraser River sockeye management units. In-season run size information is used to set spawning escapement objectives, gross escapement objectives, and calculate the available TAC for each management unit. In-season information often changes rapidly and managers must consider the potential outcomes of uncertain information before determining opportunities for fishery openings. In determining fishery openings, managers also consider expected catches and expected stock composition in future fisheries to assess whether harvests are consistent with TACs. While there have been proposals to adopt specific rules, such as the "10/10" rule outlined above, the current management approach has primarily focused on achieving escapement, TAC, and exploitation rate objectives across all of the management units. However, work is also underway to develop new tools, models and research to explicitly incorporate key uncertainties in in-season information into the decision making process (e.g. Bayesian run size model development by the Pacific Salmon Commission, SFU sockeye modeling work, in-river tagging and telemetry studies).

#### *Fraser Chinook Salmon:*

*Concern 1: In recent years the DFO stated management objective for early timed Fraser chinook was to "not increase exploitation." This year DFO is proposing to 'minimise further declines.' We suggest that this objective is inadequate and these CUs require an effective rebuilding plan and a clearly stated management objective consistent with this plan.*

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The Department shares the MCC's concern for ensuring the conservation of Fraser River chinook. In the second draft of the IFMP, the Department has further revised the objective for Early-Timed (ET) chinook as follows:

The objective is to implement management actions that will reduce the exploitation rate approximately 50% relative to the 2006 to 2007 period.

This objective provides a transparent metric for comparing the effectiveness of management actions implemented to conserve ET Fraser chinook. The Department has also included a new management objective for Spring and Summer (SS) chinook in the IFMP that specifies management actions depending on the in-season abundance of these populations. As the Department moves forward with establishing WSP benchmarks for Fraser River chinook populations, the Department plans to review the effectiveness of the current management objectives for rebuilding these populations.

*Concern 2: It remains difficult to assess the effects of DFO's conservation efforts in 2008, particularly in the Victoria area sport fishery where a mix of slot size limits and mark selective fishing made assessments very difficult.*

Management measures in 2008 appeared to be effective as spawning abundances improved for both ET and SS chinook. The Department is aware of the concerns that have been raised about the effect of mark-selective fisheries and to date only a limited partial mark-selective fishery has been implemented in the Juan de Fuca area near Victoria in 2009 (similar to measures implemented in 2008). This fishery allowed some harvest of other more abundant chinook populations, including hatchery origin (e.g. adipose clipped) chinook, but is expected to reduce catch and release of wild fish. The creel program in the Victoria area has also been enhanced to collect additional data from this fishery to assess the effectiveness of these regulations. In addition, ongoing analysis, consultations, and discussions on fishery management approaches (including updated information from coded-wire tag recoveries in 2008 fisheries) will take place in the coming year to further refine the management approach for the 2010 season. The Department agrees that additional discussion is required on mark-selective fisheries and the Integrated Harvest Planning Committee (IHPC) has identified a working group to begin discussions on the issues surrounding the use of mark-selective fisheries in Canada. Additional consultations with the MCC and other harvesters will also be required.

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Thank you for your input and review of the 2009/10 South Coast Salmon IFMP. The many recommendations provided in this letter were considered during reviews of the feedback provided to the Department on the IFMP. Thank you for providing your advice on the salmon IFMP and for your active participation in the IHPC process.

Sincerely yours,

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