

March 4, 2009

Paul Ryall
Salmon Team
Fisheries and Oceans Canada

Dear Paul Ryall:

This letter summarizes key recommendations from the Marine Conservation Caucus on the 2009 south coast salmon integrated fisheries management plan (IFMP). We would like to discuss these recommendations in the short-term and before the salmon IHPC meeting in March. There is a strong scientific and technical basis for these recommendations. As a result, we have included key DFO scientists and the Fraser Panel Technical Committee as copied recipients of this letter and look forward to including relevant technical support in this meeting.

We would also like to highlight that similar recommendations have been made in previous years, with little or no resulting improvements in the IFMP. The drastically poor returns, and subsequent management, of salmon fisheries in 2007 and 2008 make the need for these changes even more apparent and urgent.

Include Conservation Unit information in 2009 salmon Integrated Fisheries Management Plans

The Wild Salmon Policy was released in 2005. Since that time DFO scientists have conducted good work in identifying conservation units (CU). Although further work is necessary to identify benchmarks and establish appropriate monitoring programs, it is critical that information on salmon CU's is included in both the north and south coast salmon IFMPs.

Recommendation: At minimum, all salmon CU's should be identified with whatever information on status is available. Objectives as they relate to CU's should be stated. For CU's 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 This reporting could be achieved as an upgrade of the now out-of-date salmon outlook reporting on various stock groupings.

Replace failing decision rules for Fraser River sockeye salmon fisheries

We have identified significant technical and policy problems with the Fraser River Sockeye Spawning Initiative (FRSSI), particularly the potential misuse of past data to model multiple future years despite strong evidence of inherent non-stationarity of salmon productivity and declining productivity as a result of habitat loss and climate change. Decision rules derived from this process have resulted in fisheries that have contributed to missing total mortality objectives regularly, and often severely, for timing aggregates in the past four years. Pre-season forecasts have been positively biased, as evidenced by recent performance, and also shown by recent investigations by Pacific Salmon Commission technical staff.

Despite the poor performance of total allowable mortality (TAM) rules derived from FRSSI in meeting stock specific conservation goals for Fraser sockeye, even the inadequate protection of TAM rules is routinely abandoned for the most vulnerable timing aggregate in favour of fixed exploitation rules. Applying fixed exploitation rates to stock aggregates that require full protection under the already optimistic TAM rules has no other purpose than to allow the continued overfishing and eventual extinction of distinct Fraser sockeye CU's.

Recommendation: 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 designs effective in-season management tools that are precautionary and ensure escapement goals for CU's are met.

Recommendation: 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 CU's at risk, including Cultus Lake sockeye.

Recommendation: 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.

Fraser chinook salmon

A number of Fraser chinook CU's are in significant decline. Concerns with the earliest timed Fraser chinook are most acute (Upper Chilcotin, Cottonwood, Blackwater, and Chilako), but concerns also remain for several spring and summer Fraser chinook CU's. 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 CU's require an effective rebuilding plan and a clearly stated management objective consistent with this plan.

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. We look forward to a detailed review of the 2008 fishery, but we believe that Fraser chinook CU's require greater protection, and a rebuilding plan with specific escapement benchmarks.

We look forward to discussing these recommendations in a meeting prior to the March salmon IHPC meeting. We encourage the participation of DFO scientists as these issues and recommendations are technical.

Sincerely,

Ken Wilson and Craig Orr
Watershed Watch Salmon Society

Jeffery Young
David Suzuki Foundation

cc. Paul Sprout
Mike Lapointe
Fraser River Panel Technical Committee
Al Cass
Mark Saunders
Chuck Parken
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