



Fisheries and Oceans
Canada

Pêches et Océans
Canada

Deputy Minister

Sous-ministre

CLASSIFICATION

MAY 31 2005

2005-002-00873

MEMORANDUM FOR THE MINISTER

STAKEHOLDER POSITIONS ON THE WILD SALMON POLICY (WSP)

(Information Only)

SUMMARY

- The Wild Salmon Policy has been completed following an extensive round of consultation. The majority of participants endorsed the policy content and confirmed the need to proceed with implementation.
- Following the consultations in April, there were three outstanding concerns regarding the policy. First, many participants were critical of the approach to regulation of aquaculture, and advocated more rigorous controls be imposed. Second, ENGOs sought a more prescriptive policy that would fetter discretion, and more rigorous enforcement of the habitat provisions of the Fisheries Act. Finally, most participants advocated incremental resources to enhance the effectiveness of the policy's implementation. Their public support of the policy will be influenced by whether new money is assigned to its implementation.
- A summary is presented of the position of various stakeholder organizations which participated in the consultation process for the WSP.

Background

- On December 17, 2004 you released a draft Wild Salmon Policy. A consultation period of 60 days was announced with a commitment to complete the policy by May 31, 2005. The policy was posted to the internet and the public was invited to offer comment.

Ottawa, Canada
K1A 0E6

Canada

- An extensive round of consultation was completed that included community and bi-lateral sessions with First Nations throughout B.C., meetings with fisher organizations, environmental groups, municipalities and Provincial and Territorial representatives. Over 250 written submissions were received.
- A revised document incorporating substantive comments raised during consultations was prepared, and was released to the public on the internet on April 19. Follow up forums were held with First Nations on April 29 and with the participants from the March forum on April 30.
- The Department has been asked to assess the degree of support for the WSP which can be expected from the various interests involved. A summary of the position of the main organizations, based on statements made at the April Forums and follow-up telephone conversations with organization representatives is as follows:
 - **Pacific Resource Conservation Council (PRCC).** In a letter to you dated May 18 the Council expressed support for the April 2005 draft of the WSP. Their advice was to finalize the Policy, and move ahead on implementation.
 - **The Province of BC.** Staff from the BC Ministry of Food and Fisheries have confirmed that the Province supports the WSP, and that Minister Van Dongen will be sending you a letter endorsing the Policy.
 - **Sportfish Advisory Board (SFAB).** Mr. John Brockley (Chair of the North Coast Subcommittee) has expressed support for the WSP. His major concern is that we do not yet have an implementation plan nor the resources that are needed to implement it. Mr. Bill Otway describes the policy as "supportable and laudable", but he is unlikely to express public support due to overriding concerns regarding resources, and commitment to implementation of the Policy. In particular, he has vocal concerns about the integrity of the habitat program stemming from planned reductions in the number of Fishery Officers that will be protecting habitat.
 - **First Nations.** First Nation response is expected to be mixed. Some expressed a desire to adopt the policy and get on with implementation while others asked for more consultation leading to a final sign off. Mr. Harry Nyce (Director of Fisheries and Wildlife – Nisga'a Government) was pleased with revisions that recognized the Nisga'a treaty and stated that he would recommend acceptance to his government. At the April 30 forum Mr Fred Fortier (Chair – Secwepemc Fisheries Commission) summarized the outcome of the April 29 First Nations forum and indicated that First Nations could support a revised WSP, subject to a legal review to ensure it does not infringe on First Nations Rights and Title. He also indicated that the policy needs to be a living document with continuing consultation on details of implementation concerning First Nations. They wish to see adoption of a decision-making process with appropriate FN representation to ensure protection of local populations that will reflect FN social value, not those of others. Mr Arnie Narcisse (Chair of the BCAFC) supports the need for a wild

salmon policy but advocated that the final document and the implementation plan adhere to case law and include a process for consultation and an appropriate governance structure to provide for shared decision making with First Nations. He and Mr. Fortier also noted the need to develop case studies of WSP implementation with First Nations to illustrate how it will work in marine and terrestrial areas.

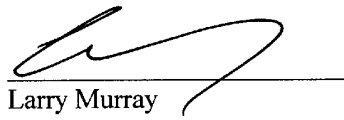
- **BC Seafood Council.** Ms. Cristina Burridge indicated that the BC Seafood Council was supportive of the April 2005 draft of the WSP. She also noted that the Policy has undergone changes that make it more “conservationist” as the result of the public consultation process, and advised that the support of the Seafood Council would be withdrawn if further changes were introduced that made it more restrictive.
- **BC Wildlife Federation.** Dr. Dave Narver indicated that the Federation was supportive of the WSP. Like other groups, the main concern of the Federation was whether there were adequate resources to implement the WSP. He also noted concern about how the WSP may affect sportfishing opportunities for Chinook salmon.
- **Marine Conservation Caucus.** While many revisions have been made to the WSP to respond to MCC comments, the MCC does not endorse the WSP. The Sierra Club in particular has voiced concern that the policy is not adequately directive. There is also a concern that the treatment of aquaculture is not sufficiently prescriptive. They do not believe DFO has the resources to implement the WSP.
- **Pacific Streamkeepers Federation.** The Streamkeepers, a member organization of the MCC, support the Wild Salmon Policy with the proviso that DFO assigns necessary resources to ensure its effective implementation.
- **Academic Community.** Dr Randall Peterman, a resource ecologist who has been a central figure in the development of the Precautionary Approach, is supportive of the policy. Dr. Evelyn Pinkerton has been involved with fisheries policy from a social science perspective and she endorses the policy. Both indicated concern with the level of resources available to be dedicated to implementation.

Analysis / DFO Comment

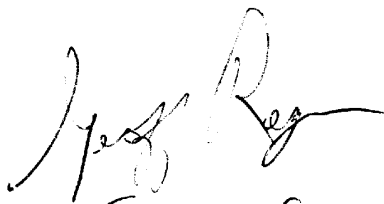
- There is a strong base of support for the Wild Salmon Policy, but public expressions of support will be tempered by concerns over funding for implementation.
- The main exception to the general consensus of support for the WSP is the Marine Conservation Caucus. It was never anticipated that all interests could be fully satisfied with the policy. The concern from the Seafood Council that the policy not be made more conservative, coupled with the endorsement from the PFRCC and academics, indicates that the Policy has achieved an appropriate balance.

Recommendations / Next Steps

- It is recommended that you adopt this policy and publicly announce it later in June.



Larry Murray



I concur. JUN 23 2005