

Paul Macgillivray
Acting Regional Director General
Fisheries and Oceans Canada – Pacific Region
Fax: 604-666-8956

December 20, 2003

Re: Fraser Sockeye Escapement Planning Initiative

Dear Paul:

The Pacific Marine Conservation Caucus (MCC) and its Salmon Subcommittee would like to thank you for the opportunity to meet with Paul Ryall and Gottfreid Pestal to review progress to date by the Fraser sockeye escapement planning initiative. We found the presentation interesting and informative and believe that the computer program developed is a useful tool. However, we also want to make it very clear that as useful as this program may be, we do not agree that the model adequately incorporates issues such as wider ecosystem needs and endangered and weaker stock management in setting escapement goals. Because of this we have serious concerns about using this program to set escapement goals for Fraser sockeye in 2004 and in future years.

We are looking forward to DFO using this tool to explore the theoretical consequences of alternative management approaches. We expect to learn a great deal through this process. We hope to learn more about how models of population dynamics, such as those implicit in Ricker curves, form a useful basis for making management decisions. We also hope to better understand the limits of these models, and the situations in which they will not serve salmon management well. We feel that the theoretical models used in the sockeye initiative make a number of optimistic assumptions, in particular with regard to population productivity, which make them risky for setting objectives in the management of weak and endangered populations in mixed stocks ocean fisheries.

Increasing that risk is the fact that we have very little understanding of population dynamics of salmon populations approaching extinction, including the vulnerability of these populations to habitat change, random events, and predation.

The MCC believes that ecological values and the conservation of biodiversity must rate much higher in the management of Pacific salmon in light of the huge role these animals play in terrestrial and aquatic ecosystems (over 140 species prey on salmon). The fact that the Committee on the Status of Endangered Wildlife in Canada has listed as endangered upper Fraser coho, and Sakinaw and Cultus sockeye, and the steady declines in other Fraser salmon populations suggests that conservation of salmon is not being given the priority it deserves; this also does not bode well for the conservation of the other creatures which depend on salmon.

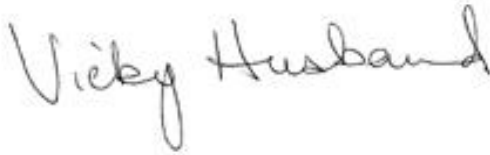
We are deeply concerned about the long delay in developing a Wild Salmon Policy and the inability of the department to live up to the previous minister's commitments to have

a WSP in place by the end of 2003. A clear and unequivocal commitment to conservation is the only sound approach to establishing long-term management objectives for fisheries. How can you develop "long term" Fraser sockeye escapement plans without this commitment? We need a WSP to inform and guide this process.

As a final note, we expect that DFO will take a highly precautionary approach in avoiding interception of upper Fraser coho and Sakinaw and Cultus sockeye in fisheries targeted at Fraser sockeye in 2004. We expect that DFO will make the precautionary assumption that upper Fraser coho, Sakinaw sockeye and Cultus sockeye will be listed and protected under SARA effective June 5, 2004, and develop your fishing plans to be entirely consistent with the provisions of the Species at Risk Act. We feel that in any event, your obligations to put conservation first, and your obligations to protect the interests of First Nations and honour Canada's commitments to protect biodiversity demand no less.

The MCC would appreciate the opportunity to meet with you at your earliest convenience to discuss these matters in person and we look forward to our continuing involvement in this process.

Sincerely,



Vicky Husband and Craig Orr
Co-chairs - Pacific Marine Conservation Caucus

MCC Salmon Sub-committee organizations:

David Suzuki Foundation
Raincoast Conservation Society
Sierra Club of Canada, BC Chapter
Watershed Watch Salmon Society