

April 27, 2004

Paul Macgillivray
Acting Regional Director General
Department of Fisheries and Oceans
401 Burrard, Vancouver, BC
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Dear Paul:

We appreciated the opportunity to meet with you and your colleagues to discuss our concerns about your department's management and care of wild salmon. To reiterate for the record, these are the issues that were presented and discussed:

- **Wild Salmon Policy (WSP)**

The wild salmon policy is unacceptably late (despite public commitments from DFO), no one knows what set of principles has finally been agreed on, and it appears that the current version is far less prescriptive than earlier drafts which also promised four sets of operational guidelines. Pat Chamut acknowledged that: the task is technically complex, there are differing internal views within DFO on what a WSP should contain, that the principles are "probably not much different than before," a draft should be released by late May (though some uncertainty was possible due to an anticipated federal election), consultations would hopefully be completed by the end of September, and that, since the current draft was less prescriptive than earlier versions, the conservation sector might have concerns. We briefly compared disparate salmon farming regulations in Canada and Norway to highlight such concerns (the lack of prescriptive safeguards for wild salmon).

- **SARA and COSEWIC**

COSEWIC made two emergency listings last year for Sakinaw and Cultus sockeye, Upper Fraser coho was already listed by COSEWIC. All these runs are at risk of extinction. We asked if and when the Minister will support the listing of these three critically endangered salmon stocks under SARA, and were told an announcement was imminent.

- **IFMP**

We expressed ongoing concerns about continuing high harvest rates on weak stocks (the 2003 season, in particular, in the Fraser), the lack of clear management objectives, and the need for fishing plans to incorporate science-based risk assessments into management decisions, such as proposed fisheries openings in Johnstone Strait. We expressed concerns that the PSARC scientific process was being unduly and unacceptably fettered by industrial interveners, and clearly articulated our position that the MCC be allowed to send two members to each of the two proposed harvest committees. You replied that "the disparity issue has been noted."

- **Long Term Sockeye Review Process**

We previously sent a letter expressing concerns that this process is bogged down in the production of an extremely technical and complicated model, and outlined our reasons for withdrawing from the process. Those concerns include the fact that the objective function is incomplete and does not yet adequately capture conservation values and concerns. The sockeye model, like the IFMP, needs to be informed by a WSP. We want development of transparent decision-making processes with clear goals based on best available science and clearly articulated values.

- **Promises: April 2003 promises by the Minister of Fisheries and Oceans have not been fulfilled.**

Most of these promises for full stakeholder participation in planning for the conservation of salmon and other marine species have not been fulfilled. There is no North or South Coast Harvest Committee in place in time to comment on the upcoming 2004 fishing season. There is no overriding Policy Committee in place to deal with all marine issues. The planning for the 2004 fishing season appears to be the “business as usual” approach. This is not acceptable

- **Promises: December 2001 promises by the Minister of Fisheries and Oceans have not been fulfilled.**

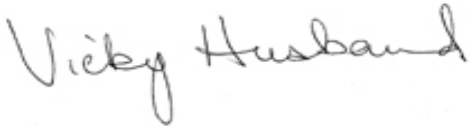
The promises for the rebuilding and conservation of rockfish and lingcod on the BC coast have not been fulfilled. The conditions that would allow the continuation of directed rockfish fisheries do not exist, at present, for any of the fisheries management areas of the coast. These conditions include defensible biomass estimates and verifiable catch data. The targets for large-scale closed areas, a “network” of harvest refugia in Fisheries Management Area 4B – which takes in Johnstone Straits, the Strait of Georgia and adjacent areas – to encompass roughly 50 per cent of known rockfish habitat types in the area, and ii) a similarly designed network of harvest refugia to encompass a minimum of 20 per cent of the known rockfish habitat types elsewhere on the coast, have not been achieved. The present slate of proposed areas were selected without defensible scientific criteria being in place and do not reach the proposed targets stated above. We also want to ensure that the closures for lingcod remain in place in the Strait of Georgia, until the stocks have recovered.

- **Access to Data**

We have been denied access to data, despite repeated requests for necessary data. This has been going on for a long period of time, despite promises that the access would be forthcoming. We are now no longer able to participate in processes, such as CGIAC, the Commercial Groundfish Industry Advisory Committee, and the department’s efforts to move the groundfish fishery towards more integrated groundfish management as we cannot fully and meaningfully participate without access to data. This lack of access to data is also affecting researchers at Simon Fraser University, UBC and University of Washington, and others, who would be supportive of DFO and the necessary research work to be done.

Once again, thank you for your time.

Sincerely,

Handwritten signature of Vicky Husband in cursive.Handwritten signature of Ken Wilson in cursive.

Vicky Husband and Ken Wilson, Sierra Club of Canada

Handwritten signature of Craig Orr in cursive.

Craig Orr, Watershed Watch

Cc:

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