



BC CHAPTER

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June 17, 2005

Hon. Geoff Regan
Minister of Fisheries and Oceans

Dear Minister Regan,

We write to express our deep concern with a proposal from the Commercial Salmon Advisory Board (CSAB) to the Integrated Harvest Planning Committee (IHPC) to increase the exploitation rate on endangered Cultus Lake sockeye from DFO's recommended maximum of 10-12% up to 30%. CSAB maintains this would be without significant risk to this critically endangered stock – of which only approximately 200 are expected to return this year.

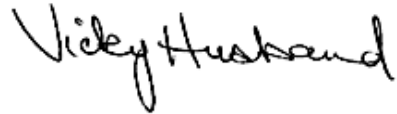
The Marine Conservation Caucus understands that DFO has 'refined' the CSAB proposal to include expansion of the Cultus Lake sockeye captive brood stock program and that DFO will accept approximately \$800,000 for a "modest" increase in the Cultus exploitation ceiling up to 15%. We find this acceptance of money for the option of fishing down a critically endangered species distasteful in the extreme and not in keeping with your commitment, as the Fisheries Minister, to protect these endangered stocks if they were not listed under SARA. DFO, under your leadership, opposed the listing of Cultus under SARA, it is now DFO's responsibility to protect this endangered stock.

We find the process by which the CSAB proposal was introduced and accepted by DFO to be unacceptable. The time provided for proper assessment and response is irresponsibly short. The CSAB analyses are preliminary, have not been peer reviewed, and do not constitute a cost benefit analysis. The future of an endangered population is at stake here, and without a controlled demonstration that this controversial proposal to increase the harvest rate of an endangered stock will aid its recovery, the experiment should simply not be allowed. There should be no increase in harvest until the stock has increased in numbers.

We strongly oppose the idea that unproven and highly uncertain future benefits to the Cultus stock from enhancement or habitat improvement are adequate reason for immediate increases in harvest. We urge DFO and the Minister to manage Cultus sockeye to DFO's own recommended exploitation rate ceiling of 10%, which is risky enough in itself for so depleted a population. A 10% exploitation ceiling would demonstrate some consistency with the precautionary principle and a commitment to conservation. It should also be remembered that the proposed strategy not only impinges on Cultus sockeye but also on all stocks in the aggregate, some already in significant decline. This proposed increased exploitation of Cultus has the potential for harmful impacts on First Nation's fishing rights.

We would like to request a close reading of the attached Draft by DFO and IHPC and a rapid reconsideration of this ill-considered and potentially very harmful proposal.

Sincerely,



Vicky Husband,
Salmon Committee
Pacific Marine Conservation Caucus,
c/o Sierra Club of Canada, BC Chapter
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cc:

Larry Murray, Deputy Minister,
Paul Sprout, Director General, Pacific Region
Bert Ionson
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Integrated Harvest Planning Committee