

April 19, 2006

Pacific Salmon Integrated Harvest Planning Committee

Dear IHPC members:

RE: IHPC process and Cultus negotiating principles

Last year the salmon committee members of the Marine Conservation Caucus (MCC) were engaged with a sub-committee of the IHPC in the evaluation of a proposal from the CSAB to allow commercial fisheries in Canada to increase the harvest rate on endangered Cultus sockeye. The harvest rate proposed was too high for a critically endangered stock so in order to compensate for this impact the CSAB proposed to provide an unspecified amount of funding to 'enhance' Cultus sockeye in order to reduce the extinction risk presented by over harvesting. Due to the limited time available in 2005, no agreement was reached, but the CSAB made it clear that they would pursue the proposal in 2006. The IHPC is again now considering increases to the exploitation rates of Cultus sockeye for implementation in 2006.

The MCC is pleased to discuss the conservation of Cultus sockeye. We are, however firmly committed to the rebuilding and recovery of Cultus wild sockeye, and we will not support any course of action that does not place a high level of priority on conservation. The MCC has a number of concerns.

The MCC is concerned that following development of the Cultus Recovery Plan the Recovery Team was disbanded and an Implementation Team was not formed, nor was any Action Plan prepared or approved. The expertise necessary to assist the IHPC in evaluating the costs and benefits of alternative harvest strategies or enhancement measures under consideration is not present within the IHPC. This expertise is also not present in the Cultus Structured Decision Making (SDM) sub-committee.


This lack of expertise is of serious concern to the MCC because it appears that the IHPC and the Cultus SDM sub-committee are being asked to develop harvest and enhancement plans for Cultus sockeye. Such plans should be prepared by a multi-disciplinary, and largely independent implementation team, or by the original Recovery Team. Given the strong vested interests present within the IHPC, it is our view that the IHPC requires the guidance of an independently prepared and approved Action Plan for Cultus recovery. It is, in our view, a conflict of interest for the IHPC or any IHPC sub-committee to assume a central role in action planning for Cultus sockeye that is in fact a public resource.

Further, the MCC believes that public interest in the management and a process that is open to the public would better serve conservation of Pacific salmon. It is our strong view that all IHPC meetings must be public meetings, that verbatim minutes of every meeting are made publicly available, and that advice derived from the IHPC and delivered to the minister is also made available to the public. First Nations, organizations represented at the IHPC table, and the public must be able to determine for themselves if their interests are being adequately represented in all IHPC deliberations. Otherwise, how can we be held accountable for our advice?

Given these concerns, the MCC has prepared the attached Negotiating Principles and a list of significant issues related to our involvement in the current negotiations concerning the harvest and enhancement of Cultus sockeye. We consider this a public document. If the other members of the IHPC have concerns about this document, its contents, or the approach that the MCC is taking to these deliberations, the MCC will be pleased to discuss them.

Sincerely,

Pacific Marine Conservation Caucus, salmon committee members



Vicky Husband
Sierra Club, BC Chapter



R. John Nelson
for Raincoast Conservation Society



Craig Orr
Watershed Watch Salmon Society



Nicola Temple
Raincoast Conservation Society



Bill Wareham
David Suzuki Foundation



Ken Wilson
for Sierra Club, BC Chapter



Jeffery Young
David Suzuki Foundation

Attached: MCC Cultus Negotiating Principles and Issues.

cc: Paul Sprout
Paul Ryall

Prepared by: Pacific Marine Conservation Caucus, Salmon Committee

Principles of IHPC Negotiation

Principle 1: We remain firmly committed to the full recovery of wild Cultus sockeye.

Principle 2: As a starting point, all harvest and enhancement measures must be consistent with the best available science and the recovery objectives in the Recovery Plan prepared by the Cultus Recovery Team. Any option approved by the MCC must reduce the risk of Cultus sockeye extirpation.

Any process leading to increased harvest levels for Cultus sockeye, particularly associated with enhancement funding, must deal with these issues:

- In the absence of an Action Plan for Cultus recovery that is supported by the federal government, there is no way to determine whether funding provided by the commercial sector adds to or replaces funds that DFO has an obligation to provide for Cultus recovery. This issue must be addressed immediately and prior to evaluation of increased Cultus harvest levels.
- Determining and weighing the risks and benefits of various enhancement options will require considerable and specific technical expertise outside the IHPC working group. Experts must be made available and given sufficient time to conduct the required analyses. We recommend that the department immediately establish a working group to develop and implement an action plan for Cultus sockeye recovery. Failing this, the former Recovery Team should be re-convened to assist in the assessment of Cultus harvest and enhancement options.
- Cultus sockeye is not “The Problem” but rather a symptom: we are fishing Fraser sockeye too hard in mixed stock areas while encountering changes in fish behavior, survival and environmental conditions. This largely irreconcilable uncertainty reduces the ability to forecast or measure Fraser sockeye abundance and increases the risks imposed by harvest. The conservation status of Fraser salmon awaits the description and assessment of conservation and management units under the Wild Salmon Policy. We do not believe that relaxing harvest restrictions on Cultus and other late stocks should be considered independently of other significant conservation concerns within the Fraser or elsewhere. Nor do we believe that the benefits of increasing the exploitation of summer and late runs can be calculated without considering the lost yield resulting from future management actions necessary to address conservation concerns for individual summer and late run stocks other than Cultus. One method to address these conservation issues is to develop near terminal commercial and sport fisheries.
- The use of the ‘Socio Economic’ analysis in the process leading to a decision concerning the 2006 fishing plan is problematic. We have profound concerns about the way that conservation and First Nations’ values are measured and weighted in this analysis. This analysis needs to be done correctly, far more than it needs to be done in a hurry, and resolving our concerns may take more time than the current planning window for 2006.