

Pacific Marine Conservation Caucus, Salmon Committee
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To the Members of the Pacific Fisheries Resource Conservation Council:

RE: Habitat Status Indicator Workshop – Implementation Questions

The Pacific Marine Conservation Caucus (MCC) would like to thank the Council for hosting the Habitat Status Indicator Workshop on March 25th. We understand that you will be making a recommendation to the Minister of Fisheries and Oceans on this issue and thank you for this opportunity to provide feedback.

First, we must stress the need for action, a point we brought up throughout the workshops held between March 23rd and 25th. We are concerned that scarce resources will be depleted in long consultative and implementation processes when action is urgently needed to address the habitat problems we are facing. Second, the selection of appropriate habitat indicators requires better understanding of the management system they are meant to support, including clear definition of management objectives, potential management actions, and relevant reference points for measuring performance. Third, habitat assessment and monitoring, including the selection of indicators, must be integrated with the ecosystem strategy of the Wild Salmon Policy (WSP) and current scientific understanding of salmon ecosystem function.

Significant habitat information is already available to identify necessary habitat actions. Efforts to assess habitat status, such as the creation of a “provincial snapshot” recommended in the report: *Selection and Use of Indicators to Measure the Habitat Status of Wild Pacific Salmon*, would largely reaffirm known problems. Although a comprehensive evaluation of habitat status and ongoing monitoring is valuable, the need and urgency of taking immediate action to deal with clear habitat threats is far greater. The success of strategy 2, including the implementation phase, depends entirely on meeting the objectives of the WSP (e.g., “Maintain habitat and ecosystem integrity” and “Safeguard the genetic diversity of wild Pacific salmon”) and not how well the continued loss of salmon and their habitat is measured.

Habitat indicators are useful only if they support management actions and measure performance in achieving management objectives. As stated in the WSP, strategy 2 should “enable the evaluation of the effectiveness of regulatory, planning and public awareness measures, establishment of priorities, and guide regulatory and enforcement interventions”. Habitat indicators must be explicitly selected to support this objective, requiring improved definition and refinement of potential management measures and

regulatory interventions that will be pursued. Linkages between indicators and relevant management questions should be made for candidate habitat indicators in a manner similar to Table 6 of the report *Managing Pacific Salmon for Ecosystem Values*. This effort would identify management questions that are not addressed by the habitat indicators proposed by Packman *et al.* in Table 8.1.

With a constrained assessment and monitoring system there will be considerable uncertainty, requiring increased precaution to ensure effective management. To exert precaution managers must be prepared to respond to changes, or proposed changes, to human pressures applied to habitat, rather than just reacting to changes in habitat status. To achieve this type of proactive management selected indicators should include pressure indicators with thresholds that trigger habitat recovery actions and prevent further impacts.

The implementation of strategy 2, including the selection of habitat indicators, will not be effective without better integration with strategy 3. To date, the isolated evaluation of habitat and ecosystem indicators has increased confusion and slowed WSP implementation. An ecosystem perspective must be applied to all WSP strategies. A limited consideration of “habitat productivity”, particularly if related to refuted concepts such as “maximum sustained yield”, will risk further loss of salmon and contravene the WSP. The importance of maintaining natural ecological and physical ecosystem functions must be emphasized. Management objectives and indicators should reflect this priority and incorporate the latest salmon ecosystem science in their design and application.

In summary, we suggest the PFRCC make the following points in their recommendations to DFO on this issue:

- WSP implementation and proposed activities related to strategy 2 (e.g. the proposed provincial snapshot) must include and support immediate action to address current habitat threats;
- Habitat indicators should be directly linked to relevant management questions and clearly stated objectives; effective habitat selection requires definition of these questions and objectives;
- Given high uncertainty, particularly with a constrained monitoring system, suitable pressure indicators with thresholds that trigger action should be used to support a precautionary habitat management system; and
- An ecosystem perspective must be applied to all WSP strategies; in particular strategies 2 and 3 must be integrated under an ecosystem-based management approach.

Regards,

Pacific Marine Conservation Caucus, Salmon Committee

cc. Mark Saunders, Department of Fisheries and Oceans
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