

April 3, 2007

Paul Sprout  
Regional Director General (Pacific)  
Fisheries and Oceans Canada  
200 - 401 Burrard Street  
Vancouver, BC V6B 5G3

Dear Mr. Sprout,

We are writing on behalf of the Pacific Marine Conservation Caucus (MCC) groundfish committee to support Fisheries and Oceans Canada's proposal to impose strong management measures for the Strait of Georgia lingcod and rockfish recreational fishery.

The Department has recognized in published documents that a seventy-five per cent reduction in rockfish harvest mortality from 2001 levels was necessary for rebuilding the highly depleted population of inshore rockfish in the Strait of Georgia. Harvest reductions were applied to all sectors beginning in 2002. At that time, the commercial fishery immediately accommodated the reduction in TAC (122 t in 2001 to 32 t in 2002). To reduce harvest in the recreational sector, the daily bag limit of five inshore rockfish was reduced to one. Although on paper the recreational fishery was drastically reduced, the actual number of rockfish encounters, as recorded by the creel survey, has demonstrated that the recreational fishery has not met their reduction targets in four of the five past years and is currently forty-three percent over its 5-year allotted TAC.

In 2006 the Department strengthened its creel survey to allow for in-season management of lingcod as a monitoring measure to oversee the reopening of the Strait of Georgia recreational lingcod fishery. There is no apparent reason why this monitoring system cannot be applied to rockfish encounters to ensure that the fishery is maintained within the TAC (~20,000 pieces) recommended by the Department.

We recognize that the Department has taken strong conservation measures with the completion of the Rockfish Conservation Area Strategy. It is in the long term interest of recreational fishermen and all citizens to support the final step towards rebuilding and managing rockfish populations in the Strait of Georgia, the reduction of harvest to levels considered suitable for rebuilding. If a harvest reduction cannot be achieved then clearly no directed recreational fishery for rockfish or lingcod should be permitted at all until such time where management measures are fully in place. It is our opinion that the management system is available but is not being utilized.

The MCC is aware that earlier this year the Department presented several acceptable management options to the "Lingcod/Rockfish Committee". All options included an in-season mortality cap of 7,000 lingcod and 20,000 rockfish. We are writing to express our support for a management direction that ensures in-season accountability for catches in the recreational fishery. In making your decision, please be reminded of the continued poor stock status of inshore rockfish, upcoming COSEWIC review of these species,

unaccounted catch (i.e., poaching, First Nations), and the 5-year track record of the recreational fishery.

We appreciate the work you have done in improving the management of this fishery.

Sincerely,  
Groundfish Committee, Pacific Marine Conservation Caucus



Sabine Jessen  
Canadian Parks and  
Wilderness Society, BC  
Chapter



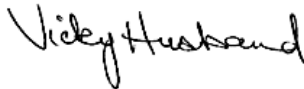
Scott Wallace  
David Suzuki Foundation



Brenda Reid-Kuecks  
Ecotrust



Dorthea Hangaard  
Living Oceans Society



Vicky Husband  
Watershed Watch Salmon  
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Cc:  
Gary Logan, Groundfish Manager, Pacific Region  
Diana Trager, Groundfish Manager, Pacific Region