

May 23, 2007

Paul Sprout
Regional Director General
Fisheries and Oceans Canada
Suite 200-401 Burrard Street
Vancouver, BC V6C 3S4

Re: Integrated Fisheries Management Plan

Dear Paul:

The MCC is frustrated by DFO's failure to effectively address a range of conservation and management issues in the 2007 IFMP. Our specific concerns related to Fraser sockeye were outlined in our letter of February 28, 2007, and in our view these concerns remain unaddressed. We see the continued declines for a number of Fraser sockeye conservation units as evidence of both broad scale changes in habitat, and over fishing. The long term declines of important conservation units of Fraser sockeye are not addressed in this plan. If the Species At Risk Act is not the best approach to the management and protection of Pacific salmon, then we need to develop and implement fishing plans that have a reasonable likelihood of preventing the long term declines that lead directly to conservation concerns and the disruption of fisheries.

Sockeye salmon are clearly struggling to survive in many areas of British Columbia and in the Fraser River in particular. In the upper Fraser, not only are many conservation units in steep long term decline and headed directly to a COSEWIC status review, but First Nations in the upper Fraser have been very clear that they are unable to harvest their food fish. Neither of these deplorable circumstances are addressed by the 2007 fishing plan presented by DFO to the IHPC. Yet this fishing plan is proposed for adoption by DFO with no analysis of the impact of this fishing plan on the delivery of food fish. We recognize that the IHPC is not responsible for commenting on the management of First Nations FSC fisheries per se; however, we believe it is both an IHPC responsibility and an obligation to consider whether the commercial and sport fisheries authorized under this plan are likely to infringe on the rights of First Nations.

Given both the longer term declines in upper Fraser sockeye, and the uncertain future facing Fraser salmon, we consider the 2007 plan to be anything but prudent or precautionary. We believe that this plan if implemented as written, poses a very significant risk of exacerbating already serious conservation concerns, and will do so in a way that puts many First Nations fisheries at risk.

We are specifically concerned for the future of the Cultus and Sakinaw sockeye. The measures to protect these stocks outlined in the IFMP are insufficient to reverse the declines in these stocks. The agreed upon harvest of Cultus sockeye is routinely exceeded, and despite an agreement to significantly relax harvest restrictions in 2006, not only was the harvest ceiling exceeded, but most of the research and enhancement used to justify increased harvest went unfunded. In 2007, the MCC supports a 10% maximum harvest level on Cultus sockeye. We

recognize that there will be significant pressure to relax these restrictions in the interest of fully harvesting stronger stocks. It is our view that doing so will hasten the extinction of Cultus sockeye and will significantly contribute to continued over-harvesting of weaker summer and late run Fraser sockeye.

We believe that salmon fisheries on the south Coast in general and for Fraser sockeye specifically are at a cross-roads. Unpredictable global scale processes are influencing our salmon in unprecedented ways, and computer simulation models based on historical data and status quo fishing plans will not solve our fundamental problems. Sacrificing conservation and First Nations fisheries in the interests of maintaining stable commercial harvests is biologically unsustainable, and very likely illegal.

The MCC urges DFO to reconsider this fishing plan and to work towards real and fundamental change in our fisheries. We believe that the elements of sustainable salmon fishing include managing individual conservation units to minimum escapement goals that prevent stock declines and support First Nations fisheries. DFO must move decisively to promote and support selective fishing in all areas, and prevent vested interest groups within the existing commercial fishery from undermining these efforts as they do now. Increasing the movement of both salmon and commercial salmon fisheries to upriver areas will protect weak stocks and support First Nations fisheries. If you are to avoid the widespread collapse of commercial salmon fisheries, the loss of less productive but important salmon stocks, and the legal challenges of First Nations, the Minister must act now. We share a clear obligation to develop and implement fishing plans that protect individual conservation units of salmon and respect First Nations rights, and we ask if now is not the time, then when? We remain ready and willing to work with DFO to achieve these goals, but we oppose the implementation of the 2007 Salmon Fishing plan as presented to us.

Sincerely,


Marine Conservation Caucus IHPC members



Craig Orr
Watershed Watch Salmon Society



Ken Wilson
Watershed Watch Salmon Society



Jeffery Young
David Suzuki Foundation



Nicola Temple
Raincoast Conservation Society



Jim Culp
Watershed Watch Salmon Society

Cc: Honourable Loyola Hearn, Minister of Fisheries and Oceans
Larry Murray, Deputy Minister
Don Radford, A/Regional Director
Paul Ryall, Lead, Salmon Team