June 14, 2010

Barry Rosenberger
Co-chair, Fraser River Panel, Pacific Salmon Commission
Fisheries and Oceans Canada

RE: PRE-SEASON MANAGEMENT ADJUSTMENT APPLIED TO LATE RUN SOCKEYE

Dear Barry Rosenberger:

The Fraser River Panel is in the process of considering what pre-season management adjustment to apply to the Late-run Fraser River sockeye salmon management aggregate for the 2010 salmon fishing plan. This letter contains our advice with regards to this matter.

If scientifically defensible estimates of in-season run size and management adjustments (MAs) are used to determine in-season Total Allowable Catch (TAC) for a management aggregate it becomes irrelevant what management adjustment, or forecast, is used pre-season. However, as this exercise demonstrates there remains the potential that fishing will be permitted on an aggregate before it is clear that a TAC is available. This is particularly true given that a fixed exploitation rate target is, inappropriately in our view, being applied to the late-run timing aggregate and that there is an expectation of summer-run TAC.

We are opposed to opening fisheries prior to establishing a TAC using defensible in-season run size estimates and MAs for any management aggregate caught by the fishery. This need is further emphasized by the very high uncertainty in forecasts of both run size and MA in recent years.

However, if the Fraser River Panel will establish a pre-season management adjustment for late-run sockeye we strongly recommend the use of a precautionary estimate that could adequately account for the potential of a devastatingly low return of late-run sockeye, and high en route mortality, commensurate with the overall low returns of 2009 and high levels of en route mortality affecting late-run sockeye since 1995.

Sincerely,

Ken Wilson
Watershed Watch Salmon Society

Jeffery Young
David Suzuki Foundation

cc Sue Farlinger, RDG Pacific Region, DFO
Salmon IHPC
Pacific Marine Conservation Caucus
Fraser River Panel, Canadian Caucus