

PACIFIC MARINE CONSERVATION CAUCUS

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April 3, 2012

The Honourable Keith Ashfield, P.C., M.P.
Minister of Fisheries and Oceans
Parliament Buildings, Wellington Street
Ottawa, Ontario K1A 0A6

Dear Honourable Minister,

Re: Fraser River Chinook salmon

Returns of spring and summer stream-type Fraser River Chinook salmon populations have been decreasing in recent years and are now considered stocks of concern by your Ministry. The trend is particularly alarming given that these run timing aggregates comprise 13 of the 17 Conservation Units for Fraser Chinook. Marine survival has been poor, but overfishing in First Nations, recreational, and commercial fisheries has compounded the problem. Restrictions to these fisheries in recent years, while difficult for all affected sectors, have not resulted in exploitation rates low enough to ensure adequate spawning escapements for these beleaguered fish populations. Major additional restrictions are now urgently required to support recovery of Fraser Chinook.

The Pacific Marine Conservation Caucus (PMCC) commends the First Nations in the Fraser watershed and marine approach areas for their recent commitment to reduce their exploitation rates on these stocks. We are dismayed, however, with the stance taken by the recreational sector in their passing of the following resolution at the March 21 public meeting of the Sport Fish Advisory Board (SFAB) in Victoria:

The Victoria SFAB Committee will not agree to or accept any further restrictions on the recreational Chinook fishery in Fisheries Management Areas 18, 19 and 20 during June, July and August each year, until DFO can demonstrate the letter of the salmon allocation policy has been met and a recovery plan is in place that includes habitat restoration, sufficient water for the fish and a SEP hatchery stock enhancement program.

Regarding the above SFAB resolution, we note the following:

- The Government of Canada has a clear mandate through past case law, and both the Wild Salmon Policy and the Allocation Policy, to give precedence to the conservation of Pacific salmon by making it the primary objective in management of the resource. Hence, the letter of the allocation policy is *not* being met, given that fisheries intercepting large numbers of Fraser Chinook persist even though conservation needs are very far from being met.

- Habitat degradation and water extraction are also threatening several of these depleted Fraser Chinook populations, and concerns over viruses to Chinook were raised at the Cohen commission by DFO's Kristi Miller. DFO must do far more to protect Fraser Chinook habitat, and the PMCC strongly supports the immediate development of a recovery plan for these depleted populations. However, the need to address habitat threats does not reduce the urgency of stopping overfishing until stocks recover.
- Demanding increased Chinook production from salmon hatcheries is a diversion from this immediate crisis. Putting aside the known risks that hatcheries pose to wild salmon populations, hatchery supplementation would have no effect on spawning escapements for spring and summer stream-type Fraser Chinook for at least four years hence. The only way to immediately deliver the urgently needed increase in fish to the spawning grounds is through fishery restrictions, and if those fail, fishery closures.
- Any fishing sector or sub-sector that refuses necessary conservation measures is not acting in their own self-interest and is ignoring the interests of others that share this valuable resource. Catch monitoring, enforcement of fishing regulations, and the prosecution of violators must be sufficient to ensure compliance with conservation-based regulations.

The PMCC requests that you immediately move to reduce the total exploitation of spring 4₂ and 5₂ and summer 5₂ Fraser Chinook salmon in Canadian fisheries by *at least* 50% from 2011 exploitation rates. Sectoral allocation of these cuts should reflect Canada's constitutional obligations to First Nations. We further request that as long as fisheries impacting these stocks are allowed to persist, you place a high priority on enforcement of fishing regulations in all fisheries impacting these stocks, and fully prosecute all violations.

Finally, given the inaccuracy of catch and escapement data, due in part to inconsistent recoveries of coded-wire-tags from fisheries, the significant public interest in salmon conservation would be well served through highly precautionary, conservative fisheries until the depleted stocks recover.

Sincerely,

A handwritten signature in black ink that reads "Craig Orr". The signature is written in a cursive, slightly slanted style.

Craig Orr, Ph.D.
Chair

Cc:

Claire Dansereau, Deputy Minister, DFO

Randy Kamp, M.P. and Parliamentary Secretary to the Minister of Fisheries and Oceans

Sue Farlinger, Regional Director General, Pacific Region, DFO

Jeff Grout, Salmon Resource Manager, DFO

Fin Donnelly, M.P. and Official Opposition Critic for Fisheries and Oceans

Lawrence MacAulay, M.P. and Liberal Party of Canada Critic for Fisheries and Oceans

Denise Savoie, M.P.

Randall Garrison, M.P.

Elizabeth May, M.P.

John Horgan, M.L.A.

Grand Chief Ken Malloway, Chair, Lower Fraser Fisheries Alliance

Ernie Crey, Executive Committee Member, Lower Fraser Fisheries Alliance

Jordan Point, Executive Director, First Nations Fisheries Council

Gerry Kristianson, Sport Fishing Advisory Board

Peter Sakich, Commercial Salmon Advisory Board

Chris Cue, Commercial Salmon Advisory Board