

January 21, 2013

Colin Masson
PICFI – Integrated Program Manager
Department of Fisheries and Oceans
Suite 200 - 401 Burrard Street
Vancouver, British Columbia V6C 3S4

Dear Colin:

Re: Commercial Catch Reporting and Compliance Monitoring Pilots

We understand that DFO is working with the Commercial Salmon Advisory Board to implement catch reporting and compliance monitoring pilot projects in 2013. DFO's new policy states that monitoring requires independent verification of releases, catch, and effort. It is therefore evident that any pilot project should evaluate methods and techniques to independently verify all three.

In addition, in that the fleet's potential impact on non-target stocks and species is a significant conservation concern, it would seem that any pilot project should place significant emphasis on methods and techniques to cost-effectively independently verify releases and to ensure that the results meet the MSC test of being "scientifically defensible".

However, it has come to our attention that the pilot projects will only evaluate methods and techniques to independently verify catch and effort. The pilot projects will not evaluate methods to independently verify the number, species, and stock composition of releases. If this is the case it is inadequate and will not even meet the "generic" level of monitoring required in the new Policy. And they fall well short of the enhanced level of monitoring required in many of BC's salmon fisheries.

DFO has defended the proposed pilot projects by arguing that it might be too challenging for fleets to incorporate independent verification of releases in the pilot projects. This argument is indefensible. Independent verification of releases has been employed in many BC fisheries, including BC salmon fisheries. Furthermore, the new Policy has been under development for two years. Commercial salmon fleets understood the requirements of the Policy and had ample time to consider how they might implement independent verification of releases, catch, and effort in their fishery.

It is therefore unclear what these pilot projects are meant to achieve and may in fact serve to further to delay the implementation of the new policy. Avoiding incorporating releases in 2013 may allow the fleet to argue that additional pilots will be required in future years to evaluate cost-effective techniques and methods to independently verify releases. We're concerned this is the same path that the Selective Fishing Policy followed: years of pilots that indefinitely postponed full implementation of the Policy.

This reluctance to implement the Catch Reporting and Compliance Monitoring Policy may be detrimental to the continued MSC Certification of BC salmon fisheries. The Certifications require

"scientifically defensible" estimates of releases. It is imperative that the Department move forward with 2013 pilot projects that evaluate techniques and methods to independently verify releases along with catch and effort.

Another concern is the lack of transparency in the development of the proposed pilots. DFO and industry have not provided the objectives of the projects; the methodology employed; the specific standards against which the projects will be evaluated; who will evaluate the methodology and results; the rigor of the evaluation; whether the results will meet the requirements in the outstanding MSC Certifications; or how all the proceeding will be communicated to the public.

The MCC is looking for DFO and industry to incorporate the following in the 2013 Pilot Projects:

- Ensure the pilot projects include independent verification of releases along with catch and effort.
- Ensure some pilot projects for each gear type reflect "enhanced monitoring" as set out in the Policy.
- Describe the specific monitoring and compliance standards against which the pilot projects will be evaluated and how these standards reflect what is required by the Policy.
- Ensure that the estimates of releases, catch, and effort meet the MSC test of being "scientifically defensible".
- Describe how the methodology and results of the pilot projects will be independently reviewed and audited against the specific monitoring and compliance standards for the pilot project, and the requirements and expectations set out in the Policy.
- Invite First Nations and stakeholder participation and comment in the development, operation, and results of the Pilot Projects through regular reports to the M&C Panel and IHPC and other relevant advisory processes.
- Invite First Nations and stakeholders to directly observe some of the 2013 pilot projects.
- We look forward to working with industry and DFO in the development and operation of the 2013 Pilot Projects.

Yours truly,



Craig Orr
Marine Conservation Caucus Salmon Committee

Cc. Carole Eros: DFO
Wayne Saito, Rupert Gale: Monitoring and Compliance Panel
Peter Sakich: CSAB