

Pacific Marine Conservation Caucus  
Salmon Committee  
1037 Madore Ave.  
Coquitlam, BC V3K 3B7  
(604) 936-9474

June 17, 2005

Members of the B.C. Liberal Caucus

**Re: STRENGTHENING CANADA’S PROPOSED “WILD SALMON POLICY”**

Dear B.C. Liberal Caucus Member:

In recent meetings with Senator Jack Austin and members of the B.C. Liberal Caucus, the Marine Conservation Caucus (MCC) was invited to provide its views on what is required to fix the current draft of the wild salmon policy (WSP)<sup>1</sup>. Our concerns are summarized in this letter and the separate attachments, which provide specific ideas to improve the WSP.

The marine and salmon conservation community has worked diligently and openly with government, First Nations, academics and others in hopes of producing an enduring policy dedicated to the conservation of Canada’s wild Pacific salmon legacy. In our view, the current WSP falls short relative to the stated goals of the WSP—and the needs and interests of wild salmon and the public.

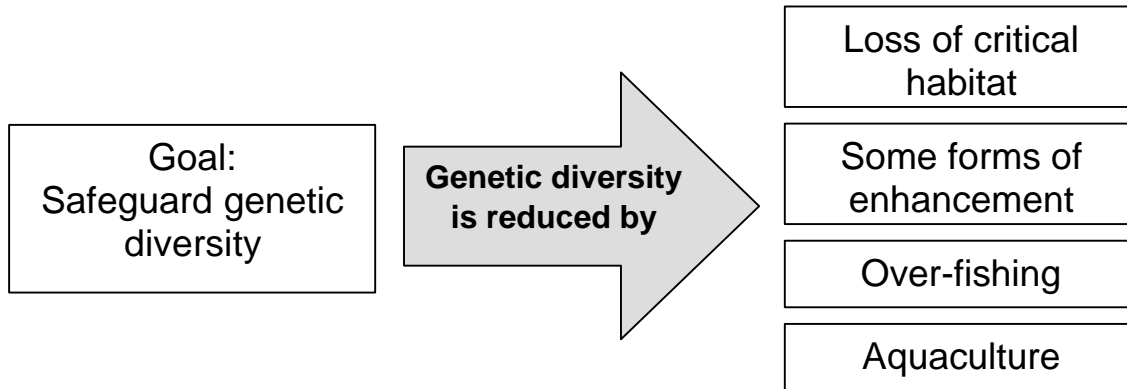
The MCC lauds the overall direction, major goals and supporting language of the proposed wild salmon policy. We are pleased that conservation is touted as the overriding principle. We are pleased that the safeguarding of genetic diversity and habitat and ecosystem integrity are the first two objectives of the policy.

Unfortunately, it will be difficult to achieve the policy’s stated goals and objectives as written. A major failing of the policy is its lack of directive language, objectives and performance measures. The policy is simply too discretionary. It also favours consumption over conservation, circumvents accountability, and provides inadequate resources for the implementation of a successful WSP.

The MCC believes DFO should craft and commit to directive language, objectives and performance measures that specifically deal with the four principal drivers in the loss of genetic diversity—that is, loss contravening the prime objective of the WSP. These four drivers, shown in the figure below, are also the same ones DFO once publicly promised to address in the WSP through “operational guidelines.” If DFO does not commit to dealing with the specifics of these issues—up front, and in the framework of the WSP—the policy cannot achieve its stated goal of “safeguarding genetic diversity”.

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<sup>1</sup> Canada’s Policy for Conservation of Wild Pacific Salmon – Draft April 22, 2005.



The MCC offers examples of specific language, objectives and performance measures in the attachments to show how the WSP might be strengthened. By adopting such objectives, performance measures, and language, the policy may better facilitate and direct the conservation of Canada’s wild Pacific salmon.

The MCC would appreciate meeting with you, on this critical issue of the protection of BC’s wild salmon and their habitat, at your earliest convenience. We would be happy to clarify our proposed changes and address any questions you may have.

Sincerely,

Pacific Marine Conservation Caucus, Salmon Committee Members

Vicky Husband, CM, OBC  
 Conservation Chair  
 Sierra Club of Canada, BC Chapter

Dr. Craig Orr  
 Executive Director  
 Watershed Watch Salmon Society

Nicola Temple  
 Wild Salmon Program Coordinator  
 Raincoast Conservation Society

Jeffery Young  
 Aquatic Biologist  
 The David Suzuki Foundation

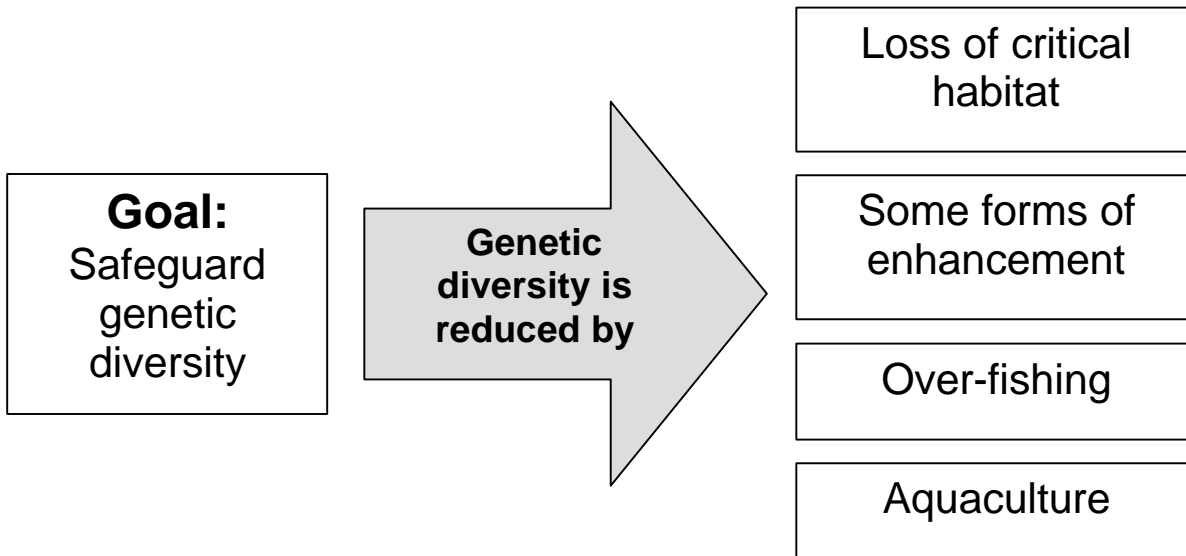
Cc: The Honourable Geoff Regan, Minister of Fisheries and Oceans  
 Mr. Larry Murray, Deputy Minister of Fisheries and Oceans  
 Mr. Paul Sprout, Regional Director General, Pacific Region, Fisheries and Oceans Canada

## ATTACHMENT 1

### Directive language, objectives and performance measures

All successful businesses measure their performance against specific objectives and pre-determined measures of success. The WSP and DFO should too. The current objectives in the WSP are overly general and difficult to measure.

The MCC offers the following examples of objectives and performance measures to show how the WSP could be improved to effectively address four principle drivers in the loss of genetic diversity (shown in figure below). These examples are not meant to be inclusive, or a remedy to all of the current weaknesses of the WSP, but merely reflective of the MCC's concerns about the lack of directive language and accountability built into the WSP. Proposed objectives are not intended to replace current objectives in the WSP, but provide more specific means to address key threats to salmon diversity. Specific language changes that will incrementally improve the draft WSP are provided in the second attachment.



### Loss of Critical Habitat

Habitat complexity (diversity) is a major contributor to salmon biodiversity, providing both productive capacity and resiliency to environmental change. The current version of the WSP does not adequately link the two measures or propose adequate protection of critical habitat.

Proposed objectives:

*Protect complex, spatially diverse, and productive spawning, rearing, and migratory habitats.*

Proposed performance measures:

*Habitat complexity is maintained to within 10% of baseline measures\*.*

\* This performance measure requires obtaining baseline measures of complexity and regular monitoring of complexity measures. Accepted baseline measures would be determined through the scientific review

of historic habitat complexity and as a result of determining the required habitat to meet diversity and productivity targets for conservation units.

## Some forms of enhancement

It is often considered that declines in wild salmon numbers can be restored after the fact through artificial means of enhancement. The enhancement ‘options’ may be monetarily expensive and cause permanent loss of genetic diversity.

### Proposed objective:

*Conservation and recovery measures directly address the specific causes of population declines.*

### Proposed performance measure:

*Direct intervention to reverse and prevent specific causes of declines will take precedence over enhancement options. Where enhancement is used to facilitate recovery, priority is afforded to methods that are most sensitive to the natural reproductive requirements of resilient populations, such as flow augmentation and spawning channels.*

## Over-fishing

Harvest levels should be sensitive to the status of individual stocks, not just stock aggregates (i.e. Conservation Units). As stock status deteriorates below pre-determined levels, management decision points will be triggered that will address the proximate cause of the stock decline. The current WSP is designed to conserve diversity at a level that does not value the persistence of small streams and spatial abundance within Conservation Units.; it also does not specifically commit to adequate reviews of declines, or actions to prevent declines, before salmon enter “red zones.”

### Proposed objective:

*Fisheries (aggregate exploitation rates) permit the persistence of abundant salmon populations that are spatially and genetically diverse as well as resilient to human-induced and natural environmental change.*

### Proposed performance measures:

*Exploitation of any wild salmon stock or conservation unit shall not exceed 50%. Exploitation on any threatened stock (assessed under existing COSEWIC criteria) shall not exceed 30%, and on any endangered stocks, 10%. Recovery plans will be established for any threatened or endangered stock and any CU not meeting its target abundance level.\*\* The recovery plan can require exploitation levels lower than the limits discussed above.*

\*\*Target abundance levels will be determined for each CU. Target abundance levels will be designed to optimize resilience and productivity as well as providing nutrient inputs required to meet ecosystem needs.

## Aquaculture

In consultations with the WSP implementation team, the MCC was told that Ottawa did not favour “treating aquaculture differently than other industrial impacts on wild salmon, such as logging and mining.” The MCC respectfully disagrees. Aquaculture, unlike mining and logging, is prone to disease and parasite epizootics that can decimate large portions of the juvenile salmon cohort, and should thus be treated as a separate and specific risk to wild salmon diversity.

### Proposed objective:

*Impacts of aquaculture activities on wild salmon diversity, particularly within the juvenile cohort, are minimized through regulation.*

### Proposed performance measure:

*Maintain motile sea lice and diseases on farmed fish below epizootic thresholds in 4 out of 5 years.*

## ATTACHMENT 2

### Proposed language changes

The following language changes have been proposed by the MCC in an attempt to incorporate language that both better reflects the goal of the policy and provides stronger direction that will guide the implementation of the policy. Though by no means exhaustive, many of the language changes are intended to build a framework that will prevent “business as usual” management of Pacific salmon and facilitate the shift in management practices that is the intent of the WSP and the desire of Canadians.

**Principle 1 Conservation (Pg. 10)** – Other stakeholder interests are well represented in the policy and so there must be clear language that states how the conservation interest will be represented in management decisions.

Suggest:

*As a reflection of DFO’s commitment to conservation, the conservation sector will be given full and equal stakeholder status in all consultative processes, such as the Integrated Harvest Planning Committee (IHPC).*

**Objective 2: Maintain habitat and ecosystem integrity (Pg. 16, paragraph 3)** – Last sentence needs to be stronger to ensure “no net loss” of habitat.

Suggest:

*In cases where habitat damage has been approved through an open and transparent process, these losses will be compensated by habitat replacement.*

**Objective 2: Maintain habitat and ecosystem integrity (Pg. 17, paragraph 2)** - The discussion of jurisdiction over freshwater salmon habitat fails to include the role of the Fisheries Act and its use in enforcement.

**The WSP and the Precautionary Approach (Pg. 19)** – We are skeptical of the Department’s promise to adhere to the Precautionary Approach, as this has not been the case with salmon aquaculture in British Columbia. In defining the precautionary principle, the Wild Salmon Policy should explicitly refer to the UN FAO Code Section 6.5: “The absence of adequate scientific information should not be used as a reason for postponing or failing to take measures to conserve target species, associated or dependent species and non-target species and their environment.”

The second bullet, which states that “decisions should be guided by society’s chosen level of risk” has the potential for serious implications. There are many historical examples of poor decisions that were a result of society’s perceived risks (e.g., racial segregation, sexual discrimination). All British Columbians want healthy and diverse populations of wild Pacific salmon in perpetuity, therefore the risk is failure to achieve this.

Suggest:

*Decisions should be guided by DFO's goal to restore and maintain healthy and diverse salmon populations and their habitats for the benefit and enjoyment of the people of Canada in perpetuity.*

**Action Step 1.1 Identify Conservation Units (Pg. 21, paragraph 2)** - There needs to be wording that states what will be done in the interim, while Conservation Units are being worked out. Some areas of British Columbia have very little genetic information on salmon populations and may be given a lower priority for establishing CUs because there are few large commercially important runs (e.g., central coast).

Suggest:

*While CUs are being determined in areas where there is little or no genetic information (e.g. central coast of BC), DFO will adhere to precautionary approach and assume that each population is genetically distinct until proven otherwise.*

**Action Step 1.2 Develop criteria to assess CUs and identify benchmarks to represent biological status (Pg. 21)** – As this currently reads, the production of hatchery fish on a single stream within a CU could maintain this CU in the green zone. Language needs to be added here and throughout the policy to ensure that hatchery production of fish is not considered to be a sustainable solution to maintaining healthy CUs.

Suggest:

*The biological status of a CU will be based on the abundance and distribution of wild salmon spawners in the unit [remove the second sentence in this paragraph as it is no longer relevant – distribution can represent demes within a population or populations within a CU, so it is applicable under all circumstances].*

**Action Step 1.2 Develop criteria to assess CUs and identify benchmarks to represent biological status (Pg. 22, paragraph 1)** – The language needs to be more directive in this paragraph otherwise there will be no need to change current management practices. On the central and north coast of BC alone (management areas 3 through 10), only 34% of streams that are regularly monitored by DFO are meeting escapement targets (By species: pinks (odd)=56%, pinks (even)=52%, chum=21%, sockeye=18%, coho=16%, Chinook=4%). Despite this, no management action has been taken and, in fact, there has been a continued trend for decreased monitoring, particularly of populations that are not meeting target escapements.

Suggest:

*Resource managers will take actions that address the proximate causes of decline in the status of a CU. Recovery plans for CUs in decline should eliminate the specific proximate and ultimate causes before other options (i.e. Enhancement) are resorted to. The status of CUs will be made public annually and the data used in the assessment will be accessible to the public.*

**Action Step 1.3 Monitor and assess status of CUs (Pg. 25, final paragraph)** – As it currently reads, it is not necessary to take any action, or even to increase assessments when a CU moves into the amber or red zones. This is consistent with current practices; many streams that are not meeting escapement targets actually experience a decrease in monitoring and assessment. There are then too few data to make informed management decisions and in the absence of information, targeted fishing and habitat destruction continue. This cannot continue to happen.

Suggest:

*For a CU in the Amber zone, a detailed assessment will be necessary as input to Strategies 2 and 3 below. If the CU is classified as Red, targeted fishing will stop and a detailed assessment will be triggered to examine impacts on the CU of fishing, habitat degradation, and other human factors, and evaluate potential for restoration.*

**Action Step 3.2 Integrate climate and ocean information into annual salmon management processes (Pg. 30, final paragraph)** - Given that salmon management is occurring within an increasingly less predictable climate (e.g., large variations in ocean survival), it should be emphasized in this paragraph that there will be improved “in-season” management to accommodate this.

Recent progress towards integrated management (Pg. 31 Sidebar) – change wording to reflect commitment to conservation:

Suggest:

*As operation of this committee evolves, it will help to provide inclusive and balanced information for the development of commercial and recreational fishing plans that respect First Nations food, social and ceremonial fisheries and other obligations to First Nations, as well as ecosystems.*

**Action step 6.2 Conduct regular reviews of the success of the WSP (Pg. 43)** – The possibility that there may be shortcomings in the policy itself is not addressed here.

Add:

*The review will also re-examine the policy itself (not just implementation) and if it is determined that the content of the policy is not adequate to ensure goals and objectives are met, wording of the policy will be revised appropriately in an open and transparent process.*