

**Marine Conservation Caucus Recommendations for Consideration in the 2016/17 North
and South Coast Salmon IFMPs**
January 28, 2016

Commercial Salmon Allocation Framework:

The MCC believes the IFMP should confirm that all Demonstration Fisheries will require additional consultation involving local or regional First Nations and stakeholders before they are initiated in 2016. The IHPC/IFMP process fails to provide adequate opportunities for interests other than the commercial proponents (First Nations and CSAB) to understand the proposed fisheries and provide informed advice. The IFMP should direct managers to consult with other affected people and identify the proposed fisheries may be cancelled, delayed, or amended based on the outcome of these consultations.

Further, the IFMP should confirm that DFO intends to work with First Nations and stakeholders to develop local or regional bodies will be developed in coordination with the revised Commercial Salmon Allocation Framework. The IFMP should provide examples of what these new types of advisory bodies may look like, such as the Somass or Cowichan Round Tables.

- 1. Fishery Monitoring and Catch Reporting:** The Department will continue to work on operational implementation of the *Framework for Fishery Monitoring and Catch Reporting in Pacific Region Fisheries* in Pacific salmon fisheries.

The failure of the Department to implement its **Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries** is disappointing. Although it should not be surprising, as it is consistent with the Department's lack of action in implementing the Wild Salmon Policy and Cohen Recommendations. However, the new Government says it is committed to addressing the short-comings of the last administration, and move forward with addressing its domestic and international obligations, including implementing its own Policies. We hope these commitments carry over into implementing DFO's own policies.

The **Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries** sets out broad four steps for implementing the Policy: Work with managers, industry, First Nations, and stakeholders to assess each fishery using the Fishery Evaluation Framework prepared by DFO with guidance from the M&C Panel to determine whether fisheries require enhanced, generic, or low monitoring; work with industry, First Nations and stakeholders to design cost-effective methods to provide the necessary catch reporting and compliance monitoring to ensure the fishery is compliant with the intent of the Policy; implement the monitoring program for each fishery; and review the effectiveness of monitoring program relative to their objectives and the Policy.

If the public is to have any confidence that DFO intends to implement the **Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries**, the IFMP should set a timeframe for when the evaluation of each fishery will be completed and a monitoring program developed implemented. The MCC recommends that the IFMP set out a time table that requires

the evaluations for each of the major BC salmon fisheries be completed by December 31st, 2016, and monitoring plans be prepared for inclusion in the 2017/18 IFMP.

The IFMP should further require fisheries of special sensitivity, that may occur in 2016, to be compliant with the Policy. Examples of such potential fisheries would be an Area 4 pink salmon fishery requiring the release of sockeye and chums.

- 2. State of the Pacific Ocean and Freshwater Environmental Conditions:** Extremely warm water temperatures were observed in the central NE Pacific Ocean throughout 2014 and continued in 2015. In addition, El Nino conditions are also expected to influence the Pacific in 2016. Environmental conditions and associated uncertainties may require discussion of potential additional adjustments to the fisheries management approaches that are outlined in IFMPs to achieve conservation and management objectives.

This statement needs to be accompanied by action in fisheries where harvest takes place in advance of adequate in-season stock assessment information. Examples are south coast chinook and IFR coho. It is recommended that in both cases DFO assume coho and chinook populations of concern be managed as if they are returning in low abundance until in-season information suggests otherwise.

3. Salmonid Enhancement Program (SEP):

- a.** A proposal is under discussion for a seapen project in the Sooke Basin (southern Vancouver Island) to increase chinook abundance; further details will be provided in February.

We understand the need and desire to increase Chinook availability; however we have concerns about whether this proposal would ultimately increase Chinook abundance, or more importantly, negatively affect that abundance by contributing to adverse ecological interactions between wild and enhanced salmon. These potential interactions include:

- competition between hatchery and wild fish (evidence suggest hatcheries replace, rather than supplement, wild salmon)
- such competition could occur with Fraser River and other Salish Sea Chinook salmon populations that are known to be important in the diets of Southern Resident Killer whales,
- the potential for disease and parasite amplification in net pens,
- straying of hatchery-reared Chinook into spawning streams with wild populations leading to competition
- straying of hatchery-reared Chinook into spawning streams with wild populations leading to genetic introgression and reduced fitness in offspring
- increased dependence of fisheries on artificial production
- approach is not consistent with Canada's Wild Salmon Policy

4. Northern BC IFMP Considerations:

a. Sockeye

- i.** Skeena sockeye – an interim escapement goal be established in the IFMP – in consultation with the Lake Babine Nation – for late timed Babine sockeye. The escapement goal would be used in pre-

- season planning, help guide in-season management actions, and to review escapements relative to the goal post-season
- ii. There is evidence that Alaskan harvests can have a significant impact on late timing Skeena salmon populations. The IFMP should identify that larger than average Alaskan catch or effort after week 30 might affect Skeena salmon fisheries after the fourth week of July.
 - iii. Last year managers told First Nations and stakeholders that fishery independent observer information would not be made public because it was “paid for by industry”. The IFMP should clarify that all fishery independent observer information will be made public in-season, and be included in-season DFO reports and made available in advisory meetings.
 - iv. The Lake Babine Nation has put the Department on notice that it wishes to have bilateral consultations on the management of its Inland Demonstration Fishery in its traditional territories. The MCC supports these consultations and believes the IFMP should reflect that these consultations have been requested, and may lead to changes.
- b. **Pink**
- i. The Skeena sockeye return is anticipated to be poor in 2016. There could, however, be a harvestable pink salmon surplus. The IFMP should identify the need for scientifically defensible estimates of encounters, compliance, and mortality of Skeena sockeye if a non-retention fishery is implemented. The IFMP should require that the fishery be evaluated, and a monitoring program instituted, that is compliant with the **Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries** before such a fishery is permitted.
- c. **Chum**
- i. Chum stocks in the Skeena River, Nass River and parts of the Central Coast continue to be stocks of concern and actions will continue to be required to limit impacts on these stocks in fisheries for other species.
 - ii. Recent research in Area 6 suggests that chum survival in non-retention seine fisheries is improved if chum bycatch is carefully handled, and returned to the water in less than two minutes. It is recommended that the IFMP confirm industry, C&P, and First Nations, and stakeholders will provide a monitoring, enforcement, and compliance plan for Area 6 that incorporates the above findings, prior to the commencement of any fisheries in Areas 6.
- d. **Steelhead**
- i. The IFMP should require all Area 8 chum fisheries have sufficient fishery independent observer data to produce scientifically defensible estimates of fleet-wide steelhead encounters and releases. The IFMP should state this information will be employed in the planning of future fisheries.
 - ii. It is recommended the IFMP identify the need for a mortality study

for steelhead released in commercial fisheries. This information, along with improved encounter rate data, will allow DFO, industry, First Nations, and stakeholders to consider what future management actions may, or may not, be required.

5. Southern BC IFMP Considerations:

a. Chinook

- i. There is little fishery independent data on encounter rates and fishery related mortalities of Fraser *Spring 4₂*, *Spring 5₂* and *Summer 5₂* chinook. The IFMP should require that fisheries that impact depressed Fraser and South Coast chinook stocks to have fishery independent monitoring programs in place that would scientifically defensible encounter rate information.
- ii. The IFMP should state that greater understanding of mortality rates of chinook stocks of concern released in non-retention fisheries is required in developing future management actions.
- iii. The IFMP should state that further work is required on understanding stock composition in fisheries that harvest south coast chinook stocks of concern.
- iv. The 2016 Outlook for southern BC Chinook salmon indicates that many stocks of concern are expected to return at low levels, including Fraser spring and summer 4₂ and 5₂ populations. The IFMP must include appropriate terms to ensure that precautionary and rebuilding management measures are included.
- v. In 2015, the MCC proposed that that management reference points be changed and that there be increases to the terminal run size limits for these populations to increase the probability of rebuilding.
- vi. In the face of likely low marine survivorship and uncertain environmental conditions the 2016 IFMP should include this advice and clearly demonstrate that the priority of the management of these populations is rebuilding and minimizing direct or indirect impacts.

b. Late Shuswap sockeye

The last two years raise concerns about the MAs DFO is employing in the management of Late Shuswap sockeye. In both years there was a significant shortfall between the number of Late Shuswap assessed at Mission and what arrived on the spawning grounds. Further, it is evident the in-season visual inspections of migrating sockeye are inadequate as a predictor of spawning success. These issues need to be recognized in the IFMP along with the need for further consideration of these two issues.