



November 29, 2018

Species at Risk Program, Pacific Region  
Fisheries and Oceans Canada  
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Sent via email to: [SARA.XPAC@dfo-mpo.gc.ca](mailto:SARA.XPAC@dfo-mpo.gc.ca)

**Subject: Support for listing Thompson & Chilcotin River steelhead under Canada's Species at Risk Act**

To Whom It May Concern:

Please accept the following submission on behalf of the Pacific Marine Conservation Caucus (MCC), Salmon Committee. The MCC is the officially recognized vehicle for consultations between the federal government and the conservation sector regarding Pacific fisheries management in Canada. The MCC's salmon committee consists of representatives from the Steelhead Society of BC, Watershed Watch Salmon Society, SkeenaWild Conservation Trust, Raincoast Conservation Foundation, Pacific Streamkeepers Federation, and David Suzuki Foundation.

This submission provides answers to the questions listed in the "Survey on the emergency listing of the Steelhead Trout (Thompson and Chilcotin populations) under the *Species at Risk Act*", which we accessed online at <http://isd.m.gc.ca/survey-enquete/eng/7d003481>.

1. We believe that listing would have significant economic, environmental, cultural and social benefits:
  - (a) Listing would motivate fishers to move to proven, truly selective fishing techniques (e.g., pound traps, beach seines, etc.), which could almost eliminate by-catch mortality of steelhead, sturgeon, wild coho, wild chinook and other non-target, at-risk salmon populations. With large-scale adoption of lower-mortality fishing gears and methods in fisheries intercepting Thompson and Chilcotin steelhead, fishing closures could be less frequent and less onerous. More chum salmon could be sustainably harvested than are currently. Overall total allowable salmon catch could increase, and trapped salmon could command a higher price per fish given their unmarked, absolutely fresh condition. The Steelhead Society of British Columbia is prepared to certify trap-caught salmon as "steelhead safe."
  - (b) Selective fishing gears, such as traps, could be a tourist attraction in themselves, and give consumers a new opportunity to purchase truly fresh Fraser River salmon.



- (c) Selective fishing is key to the recovery of not only Thompson and Chilcotin steelhead, but also to other at-risk Pacific salmon populations, sturgeon and Southern Resident Killer Whales (by facilitating recovery of chinook populations). The recovery of these populations would have substantial economic benefit.
- 2. Recovery is unlikely without listing. Any economic costs directly related to listing are short-term and are low relative to the costs of not listing and thereby forgoing recovery options.

The negative cultural impacts of not listing would be profound. The cultural importance of these fish is underscored by the explicit inclusion of steelhead in the definition of Pacific salmon used in their designation as British Columbia's official provincial fish. Public support for listing is believed to be significant as evidenced by a 2011 province-wide poll conducted by Angus Reid Public Opinion.<sup>1</sup> In that poll, 77% of respondents disagreed with this statement: "The extinction of small salmon runs is acceptable as a trade-off to maintain the commercial fishing industry's current practices." In the same poll, 82% disagreed that "The government should be allowed to let small, endangered salmon runs go extinct" and 70% agreed that "Wild salmon are as culturally important to the people of British Columbia as the French language is to the people of Quebec."

Any economic costs would be short-term transition costs as the relatively small number of fishers and fishing companies convert to selective and known-stock chum salmon fisheries and invest in fishery independent monitoring and compliance as required by Regional and National policy.

Non-fishing related freshwater recovery actions are compatible with recovering other depleted Fraser salmon species such as chinook and coho. The draft South Coast Chinook Recovery Strategy contains many recommended actions that would also benefit Thompson and Chilcotin steelhead recovery. Hence, recovery costs would have economic benefits that would flow to other species and fisheries. Further, non-fishing related freshwater recovery actions would make areas where Thompson and Chilcotin steelhead spawn and rear more resilient to climate change therefore benefiting other sectors of the economy.

- 3. Yes
- 4. None.

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<sup>1</sup> Full poll results and methodology can be found at: <https://www.watershed-watch.org/resources/wild-salmon-poll-results/>



5. Pacific Marine Conservation Caucus, Salmon Committee, comprised of the following organizations: Steelhead Society of BC, Watershed Watch Salmon Society, SkeenaWild Conservation Trust, Raincoast Conservation Foundation, Pacific Streamkeepers Federation, and David Suzuki Foundation.
6. No, but many members of our organization(s) do angle recreationally for steelhead.
7. Poul Bech: [pbbech@shaw.ca](mailto:pbbech@shaw.ca), (604) 881-6801  
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Thank you for considering our input in support of listing Thompson and Chilcotin steelhead under Canada's Species at Risk Act.

Sincerely,

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c. Honourable Jonathan Wilkinson, Honourable Catherine McKenna