



November 12, 2019

The Right Honourable Justin Trudeau
Prime Minister of Canada
sent via email

SUBJECT: Pacific mandate priorities for Minister of Fisheries, Oceans and Canadian Coast Guard

Dear Prime Minister,

Please accept this letter on behalf of the salmon committee of the Pacific Marine Conservation Caucus (MCC). The MCC is comprised of several conservation groups that together form an officially recognized stakeholder in consultations with Fisheries and Oceans Canada.

Our country is at a critical decision point with wild Pacific salmon. We have witnessed unprecedented declines in salmon runs across Western Canada with climate change undermining the foundation of their future resilience. Previous management approaches have failed and are not equipped to deal with this new era.

Fortunately, there are a number of tangible actions that the federal government and its partners can take to create the conditions necessary for wild salmon to thrive in our changing climate, building on the foundations set under your previous mandate.

Although this letter provides input from Pacific marine environmental organizations on Pacific salmon conservation, further input is also being provided from our groups, and others, with respect to broader marine conservation issues, including protected areas, aquaculture, freshwater protection and species conservation, through additional letters.

Here are key commitments the federal government should take for Pacific salmon with its new mandate:

Review and update DFO management structures and processes to account for unprecedented low returns, increasing climate change impacts, and implementation of First Nations co-management

- *Canada's Policy for the Conservation of Wild Pacific Salmon* states that "conservation of wild salmon and their habitat is the highest priority in resource management decision making."
- Fisheries management approaches must place rebuilding above harvest to ensure that Pacific salmon can thrive in climate-altered ecosystems.

- Escapement-based management strategies are needed and must be based on scientific management escapement goals, and adequately account for uncertainty and total mortalities.
- Restructuring of DFO management and science will increase the priority and pace of Wild Salmon Policy implementation.
- Fisheries should be transitioned to only take the harvestable surplus of identifiable populations.
- All fisheries (FSC, Recreational, and Commercial) must employ robust accountability and transparency mechanisms, including independent fishery monitoring and catch reporting, as is required in most other Canadian fisheries.
- DFO's science-based guidance for estimating total mortalities should be implemented for all fisheries.

Restore stock assessment capacity, including spawning ground counts, to advance in-season stock identification tools

- Fewer salmon populations are being monitored for abundance than at any time in the modern history of DFO, making it impossible for DFO staff (by their own admission) to responsibly manage salmon fisheries and prioritize recovery efforts.
- BC's commercial salmon sector has suspended their Marine Stewardship Council eco-certification due in part to DFO's inability to meet basic stock assessment requirements.

Implement the restored habitat protection provisions and new rebuilding requirements under the Fisheries Act

- Restoration and modernization of the Fisheries Act was an important achievement under your previous mandate, and implementation will help deliver concrete results for wild Pacific salmon in your current mandate.
- However, it is important that recovery plans be put in place for all salmon populations that are below their lower benchmark, and not just for populations important to harvesters.

Develop emergency recovery strategies for salmon Conservation Units identified as threatened or endangered

- Current timelines for COSEWIC assessments and SARA listings are insufficient in the face of the current salmon crisis and immediate action is required.

Complete comprehensive, peer-reviewed biological risk assessments of salmonid hatchery facilities, and make this an ongoing requirement under the new Aquaculture Act

- The Cohen Commission, DFO Science, and numerous scientific studies show that hatcheries pose an array of risks to wild salmon.
- The Wild Salmon Policy (p.36) commits to the development of a biological risk assessment framework for DFO's Salmonid Enhancement Program.
- Failure to address hatchery risks contributed to the recent suspension of Marine Stewardship Council certification.

- DFO's current Hatchery Risk Assessment Tool only assesses two of the four major risk factors (pathogens and genetics)—competition and harvest are ignored—and has not undergone formal peer review.

Thank you for considering these priorities for your next Minister of Fisheries, Oceans and Canadian Coast Guard.

Sincerely,

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