



Fisheries
and Oceans

Pêches
et Océans

Pacific Region
BC Interior Area
985 McGill Place
Kamloops, BC V2C 6X6

June 7, 2013

Mr. Ken Malloway
Chair of the Forum Planning Committee
on behalf of the First Nations Forum attendees
PO Box 188
Merritt, BC V1K 1B8

Dear Mr. Malloway:

*Subject: Feedback from the Forum on Conservation and Harvest Planning May 7 – 9 2013,
Lillooet, BC*

On behalf of the Department of Fisheries and Oceans Canada I would like to thank you for your letter dated May 20th containing feedback from the First Nation forum participants to DFO on presentations made at the May 7 – 9th Forum on Conservation and Harvest Planning. It is my understanding that since the discussions at the May forum some of the participants are continuing to meet at a Tier one level to have further dialog on fishing plans. Although not all participants are present for these discussion the Department is encouraged by the continued collaborative work on fisheries planning that is currently ongoing.

The following responds to the various proposals and concerns raised in your letter.

1. Catch Monitoring FSC presentation

While the Forum on Conservation and Harvest Planning terms of reference do not encompass management issues beyond Fraser salmon, examples of catch monitoring requirements for two non-salmon species were explored as they relate to broader catch monitoring issues raised by the participants.

The Department recognizes the conservation concerns related to Fraser River Eulachon and the importance of the Fraser Eulachon fishery to First Nations in the Lower Fraser. For this reason, DFO staff chose to be on site to view the conduct of the fishery, and to gain information about the size, quality and catch ability of fish to inform future management decisions. Also, to prevent situations that arose last year where individual harvesters exceeded their license amounts and

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thereby impacted the opportunity of other First Nations to access Eulachon, careful monitoring of 2013 harvest numbers was required.

Regarding the Shrimp Trawl fishery, in recent years, by catch reduction measures have been implemented, and Eulachon by catch levels are well below the 8 tonne action level that you identify. Current levels of monitoring are considered sufficient to assess by catch levels and determine whether further actions are required to address Eulachon concerns.

In regards to your concerns with catch monitoring requirements, DFO recognizes and appreciates the considerable amount of skills First Nations have developed in collaboration with DFO staff to monitor various fisheries and is exploring options to address the independent requirements set out in the Department's Dockside and At-sea Observer Policies.

In reference to Federal/Provincial marine water / fresh water licensing issues, mandatory reporting has been added to the 2013-14 Tidal Water Sport Fishing Licence Condition Regulations was a significant first step. Additional measures such as collaboration with the Province will be discussed and reviewed by the joint DFO/SFAB Catch Monitoring Working Group

2. Sockeye fishery

2.1 Early Stuart / Early Summer Run

a) Early Stuart Release Mortality Study

We appreciate that there was discussion on this topic at the Forum meetings and DFO has provided feedback to the UBC – Carleton research group on their proposed study design. DFO is also supportive of this research proceeding. We need to be clear that this one study alone is unlikely to lead to changes in post-release mortality assumptions on gillnet fisheries in-river, but we anticipate it will be a useful contribution to our understanding of the causes of mortality in gillnet-caught fish, and will enhance the body of literature on post-release mortalities that informs our management approaches.

Regarding the priority of fish to be harvested, we agree that the fish associated with this study need to be taken into account in calculations of Total Allowable Catch (TAC). Forum participants should be aware that if the fish required for this study are taken “off the top” of the available Canadian Total Allowable Catch (i.e. the same as test fishery catches), as you recommend, then it is possible that this study could occur even if there is no TAC identified for directed Food, Social and Ceremonial fisheries and/or the harvest in this study could reduce the amount available for FSC fisheries. The Department needs to further consider this recommendation.

b) Sharing of FSC and fishing plan

We appreciate the submission of the details around a proposed sharing plan and fishing plan for Early Stuart and Early Summer sockeye, and these will serve as a good starting point for planning discussions this year. We understand further discussion is occurring on these plans and the Department looks forward to further discussion on any proposed plans.

We agree that in-season information will be important in deciding on the plan for fishing on Early Stuarts should TAC come available. We would appreciate your views on the best process for engaging with First Nations on this type of in-season discussion.

2.2 Late Run

With respect to late run there are a number of technical points that need to be considered given the information you have provided. The Department would like to have further discussion with First Nations around these details.

3. Interior Fraser Coho

At this time, the Department is planning for fisheries consistent with the 3 % exploitation rate limit on domestic impacts on Interior Fraser Coho (IFC). The Department understands the requests to have more review of technical information related to any increase in the coho exploitation rate and a more formal review of the status of interior Fraser coho is planned prior to the 2014 season; information on this will be shared with the joint technical working group (JTWG). In considering a potential increase in the exploitation rate objective from 3 to 4%, the Department provided the available information on spawner abundances relative to recovery objectives from the *Conservation Strategy for Coho salmon (Oncorhynchus kisutch), Interior Fraser Populations* in the second draft of the IFMP. As was the case previously, the exploitation limit for Interior Fraser coho is not allocated but is intended to provide for incidental release mortalities of wild coho in fisheries for more abundant stocks and species.

4. Chinook

a) As noted in the March letter from Les Jantz to Forum participants, it is not accurate to state that recreational fisheries have continued without interruption since the beginning of January. As noted in that letter:

“Non-aboriginal fisheries that were previously opened on May 1st in the Fraser River are closed until mid-July or for the entire season in some areas.

Non-aboriginal recreational fisheries in marine waters are open year round in most areas however those fisheries are directed on Chinook salmon that are comprised of a significant number of stocks from throughout the Pacific Region. Fraser Spring 4-2 Chinook often comprise a very small (less than 2%) of the Chinook stock composition in these fisheries. Marine commercial fisheries have

been reduced to very low levels over the past 10 or more years in some instances to address the concerns for Fraser Chinook stocks”.

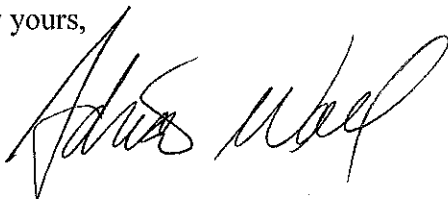
The Department also does not agree that there has been inordinate delay in providing information or making decisions regarding the implementation of First Nations fisheries. Significant effort has been placed on completing and sharing key analytical information relevant to in-river fisheries management, including updates to the Fraser Chinook run reconstruction model for 2011 and 2012 and the development of an in-river chinook planning tool (also known as “ChIAPET”). Using this information, the Department has engaged in an extensive planning process with First Nations to respond to concerns about the extended spring closures, assessing options for earlier fisheries while still advancing conservation objectives for these stocks. As a result of this work, we have succeeded in arriving at an updated fishing plan for the Fraser River. We appreciate that there has been significant effort put into this planning process by both First Nations and DFO, and this work should be acknowledged.

b) With respect to your concern on the Departments’ ability to deliver information in a timely matter. We recognize that First Nations would like to see the updated Coded Wire Tag (CWT) information to complete the ongoing work the group is engaged in with respect to assessing Chinook impacts and we will continue to strive to provide information in a timely manner. The Department also remains committed to developing an overall plan for the long-term management of all Southern BC Chinook stocks of concern as a high priority.

Thank you for your feedback on a number of important planning issues relevant to Fraser salmon management.

Lastly, the pre-season Forum on conservation and harvest planning meetings has drawn to a close for 2013. I want to express my appreciation to the Forum Planning Committee, Joint Technical Working Group, and the Fraser River Aboriginal Fisheries Secretariat for meeting coordination. While the Forum meetings can be challenging and present opportunities for improvement, they are recognized as an important venue for Tier 1 and Tier 2 dialogue for management of Fraser River salmon.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Adrian Wall', written in a cursive style.

Adrian Wall
A/Acting Area Director,
BC Interior