



FRASER RIVER ABORIGINAL FISHERIES SECRETARIAT

c/o Nicola Tribal Association
PO Box 188 • Merritt, BC • V1K 1B8
Tel: 250-378-4235 • Fax: 250-378-9119
www.frafs.ca

March 22, 2017

Rebecca Reid,
Regional Director-General,
Department of Fisheries, Oceans and the Canadian Coast Guard,
Vancouver, B.C.

VIA EMAIL ATTACHMENT

RE: March 7 – 9 FORUM ON CONSERVATION AND HARVEST PLANNING

Dear Rebecca Reid,

The second 2017 Forum on Conservation and Harvest Planning was recently held at the community of Tzeachten. This letter outlines points of discussion, advice, and actions requested of the Department by Fraser and Island First Nation participants. Discussions on several topics were limited, partly because the Department was not able to respond to the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter* prior to the March Forum.

The release of the draft Salmon IFMP for Southern BC occurred during the Forum. Though participants did not have time to review the IFMP in detail, the limited content on First Nations Socio-economic fisheries was noted and caused concern. It was also noted that the recommended content for providing detailed plans on catch monitoring and fisheries assessment was not included in the draft IFMP. Without these details, it is not possible to provide complete advice and recommendations with respect to pre-season and post-season fishing plans.

Chinook: Forum participants from the January 2016 Forum expressed that “First Nations have a constitutional right to access Chinook salmon for Food Social and Ceremonial fisheries. Serious concerns regarding the implementation of the Aboriginal Priority and the possibility that some First Nations may be bearing an unnecessary burden of conservation were raised, and have been clearly expressed at previous Forums...**the importance of access to Chinook FSC fisheries cannot be overstated**”.

Given the overwhelming importance of balancing conservation with access to Chinook again this year, discussions centered on the effectiveness of the Department’s Chinook management and conservation measures. Last year’s recommendations from the April 2016 Forum resulted in minor changes to recreational Chinook management measures, and there is little evidence of substantial changes for 2017. The frustration that there are not enough fish to meet First Nations needs was clear. **The point was made again this year for DFO to scale back recreational fisheries to ensure enough Chinook return to the river** for Fraser First Nation rights-based fishing opportunities without impacting conservation.



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In addition to the requests already made in the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*, a key concern was the Department's current use of PST management units – Specifically, the assumptions that are being made by using the Nicola CWT Indicator stock to measure management impacts on the earliest-timed, returning Chinook stocks. As well, the Spring and Summer 5(2) abundance-based management measures (Zone 1 and Zone 2) may result in undue pressure on earliest-timed Chinook stocks. First Nations are trying to be creative and to conserve but a key question is, what is happening to the earliest-timed stocks in marine waters? These stocks are very important to First Nations, and they are impacted by marine fisheries. **It was put forward for DFO to focus on the development of functional Spring/Summer 5(2) Indicator stocks, such as by reviving the Dome Creek indicator and/or other suitable systems, to help address some of these concerns.** Fraser Summer 4₁ Chinook management and exploitation was discussed in the Tier 1 session, and opportunities for rights-based fisheries on this management aggregate will be explored.

Fraser Sockeye Management: Detailed Tier 1 discussions occurred, and will help inform further messaging to the Department at the upcoming April Forum. It was noted that there is a need for a better understanding of the harvest and escapement implications for weaker stocks associated with escapement Option 1 and Option 2, as well as an explanation for why DFO presented a less precautionary planning approach given the advice from Science (P25 forecast was recommended by Science, rather than the mid-point P50 forecast). Stock specific (i.e. terminal) harvest opportunities that do not impact the TAC of sockeye stocks outside the system must be a part of management discussions with First Nations.

Coho Management: **How will impacts to Coho be planned and assessed this season?** DFO must be transparent with projected coho exploitation rates impacts amongst fisheries as part of the Forum discussions. There is also a need to address the allocation of impacts among fisheries and ensure that the Aboriginal Priority is being implemented appropriately.

Steelhead Management: First Nations were still seeking a response to the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*.

We look forward to the Department's timely response to this letter, as well as a response to the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*. **The Forum meetings comprise a step in what should be a multi-step consultation process about DFO's plans that could potentially affect the exercise of aboriginal fishing rights. The timely exchange of letters can help inform follow-up steps of engagement directly with the rights holders.**



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Respectfully,

Ken Malloway, FRAFS Chairperson,
On behalf of First Nation participants at the March 7 -9, 2017 Forum on Conservation and Harvest Planning

CC:

*DFO: Jeff Grout
DFO: Jennifer Nener
FRAFS Executive Committee and staff
First Nations Fisheries Council*