

Note: This table is intended to highlight areas where there are potential inter-sectoral issues to facilitate discussion at the IHPC meeting. The Department will be meeting with First Nations to review detailed First Nations comments; however, some comments are included below as they relate to shared issues.

SPECIES	#	IFMP FEEDBACK RECEIVED	IFMP Feedback Pkg Page:
Interior Fraser Coho			
	1	Area B endorses having the full Canadian 10% ER component of IFR coho available to prosecute targeted fisheries on sockeye, pink and chum. Area B does not support any retention fisheries of wild coho, unless it can be proven that there is little to no likelihood of encountering IFR coho.	3
	2	SFAB - for the 2015 season the Lower Fraser SFAC supports a window closure for coho fishing on the Fraser River below the Mission Bridge to the mouth from Sept 8 to Oct 9 th and non-retention of unmarked coho in Area 29-6, 7, 9 and 10 from Sept 8 th to Oct 9 th .	164
	3	MCC – planned 20% ER is not precautionary enough to ensure sufficient likelihood of meeting rebuilding targets in 2015 and beyond.	161
	4	SPABC supports managing Canadian fisheries to the 10% exploitation rate for IFR coho for the 2015 season. SPABC supports managing fisheries to give priority access to available exploitation to commercial fisheries targeting abundant south coast sockeye, pink and chum salmon so that Canadian commercial fisheries can maximize their harvest opportunities for these stocks.	11
	5	Area G proposes Option 1) Early September chinook opening (Sept 7) for all of the WCVI with coho retention permitted; Option 2) Early September chinook opening (Sept 7) with coho retention, fishing area limited to NWVI until Sept 15; Option 3) Open September 15 with coho retention in all of WCVI. In all 3 options, retention of coho would be permitted in fisheries occurring October through to end of calendar year.	7
	6	Area G interested in exploring fisheries opportunities in Area 11 and 111 in Sept to Dec fisheries and portions of Area 121 (specifically troll Zones 2 and 3) for the October fishery.	8
	7	Cowichan Tribes – management of IFR coho should be at pre-2014 conservation management practices.	-
	8	Cowichan Tribes do not support changes to wild coho retention limits within the management areas of the Cowichan coho migratory route until Cowichan coho have been assessed over 3 life cycle periods. Also, request that any changes in areas of mixed stock should be hatchery marked retention.	-
	9	QARS request that DFO return the Canadian Interior Fraser coho exploitation rate to 3% or less for the 2015/16 season.	-
	10	BC Interior FN’s request no increased recreational fishery on wild unmarked coho, a return to recreational fishery impacts consistent with pre-2014 management.	116

11	BC Interior FN's request that management be in accordance with the long term objectives of maximizing the escapement of IFR coho to 1000 spawners within each of the 11 sub-populations, including a total return of 40,000 IFR coho upstream from Hell's Gate.	116
12	BC Interior FN's request maintaining the objective of an ER on IFR coho consistent with management measures implemented prior to 2014 to account for uncertainty and bias in recreational fisheries reporting as well as commercial fisheries.	116
13	BC Interior FN's and IMAWG request alignment of Canadian domestic analysis and management consistent with the Pacific Salmon Treaty (includes fisheries impacts north of Cape Caution).	116
14	SFC requests that DFO plan fisheries impacts based on the lower range of the preseason IFR coho abundance forecast.	-
15	SFC requests that DFO maintain the status quo (excluding year 2014) IFR coho window closure in the Fraser River for (commercial/recreational/FSC).	-
16	SFC requests that in commercial net fisheries, DFO continue to require the release of all coho, and do not allow an increase in allowable mortalities to enable access to more abundant species (e.g. Fraser sockeye).	-
17	NTC support the stated objective of an exploitation rate of 10% or less for IFR coho with priority access to FR FN's and approach area FN (including NTC) for FSC access, then FR FNs and FN in approach areas for incidental harvest in economic fisheries (including directed NTC WCVI coho fisheries targeting abundant US coho stocks), and then incidental harvest in recreational and commercial approach area fisheries as needed and as the remaining ER can support within the total allowable ER.	66
18	ONA request to return to previous, low ERs in the 2-3% range until further refinement of the modeling methods is done.	75
Fraser Sockeye		
1	Area B supports using Option 2 (65% TAM) for Fraser Sockeye.	3
2	MCC supports option 1 (no TAM levels exceeding 60%) for Fraser Sockeye.	160
3	SPABC supports Option 2 (65% TAM cap rule and reference points) for Fraser sockeye escapement.	11
4	SPABC request that Cultus sockeye be managed with the same escapement/fishery exploitation goals as all other late run sockeye. This will be sufficiently pre-cautionary to allow Cultus sockeye to rebuild in the long term assuming long term productivity returns.	11
5	QARS request that Option 1 for Fraser sockeye escapement plan be implemented for 2015/16.	-
6	QARS support extended window closure to protect early timed stocks (Nadina, Bowron, Taseko) from June 28 to July 29.	-
7	BC Interior FN's recommend a Fraser Sockeye management approach that blends aspects of Option 1 and Option 2 proposed in the draft IFMP – Option 3 outlined as follows: Early Stuart – TAM Cap of 60% - Option 1 with window closure as proposed in IFMP; Early Summers – TAM Cap of 60% - Option 1; Summers – TAM	115

		Cap of 65% with LFRP of 1M for estimated summer returns of p50 or greater – Option 2 and TAM Cap of 60% with LFRP of 1M if Late Stuart return estimated less than p50 forecast or combined sub-aggregate estimate for Stellako/Late Stuart is less than p50 – Option 1; Late Run – TAM of 20%.	
	8	IMAWG recommend that the Early Stuart have additional protection by supporting the window closure outlined in IFMP.	83
	9	IMAWG supports beginning the season with Early Stuarts at the p25 forecast to account for the uncertainty in the forecast.	83
	10	SFC recommends Option 1 with LAER at 10% for Early Stuart and Early Summers. SFC recommends 20% for lates. SFC recommends 60% TAM rule.	51
	11	SFC recommends to manage Cultus Lake to ensure it meets its established recovery goal (established by the recovery team).	52
	12	SFC recommends an increase in sustainable stock selective fisheries closer to the terminal areas.	52
	13	LFFA indicate that Option 2 would provide greater opportunity for economic fisheries if they can be arranged. Concerned that Option 1 might constrain FSC fishing unduly, particularly if fisheries are to be managed proportional to the abundance of management groups.	96
	14	LFFA indicate ER for Cultus Lake sockeye not to exceed 20%. The approach to Cultus management needs to be reviewed in light of the pending removal of the captive brood supported enhancement.	96
Fraser Pink			
	1	SFC and BC Interior FN’s request independent assessment and monitoring of the proposed recreation fishery in the upper Fraser area for 2015, and adequate baseline data and analysis of this new fishery to inform future management, including planned and realized IFR coho encounters and impacts.	118
	2	SFC requests DFO protect Thompson steelhead during increased commercial, sport and FSC fishing that are targeting pink salmon by requiring more selective gear.	52
	3	FN’s request that if DFO provides a 4 fish per day limit for sport fishery, it should be matched by providing FN’s with a significant increase to their allocation as compared to 2013.	98, 153
	4	IMAWG do not support starting with the 4 pinks/day retention – fishery should remain at 2 pinks/day to begin the season until more information is known in-season about both the pink and IFR coho run sizes.	82
	5	LFFA request LF FN’s allocation should be increased (doubled at minimum subject to FN’s needs including economic) as well.	98
Fraser Chinook			
	1	Cowichan Tribes do not support the Juan de Fuca proposal for its increase in ER on Fraser Chinook due to the likelihood of an increase on Cowichan chinook.	-
	2	Cowichan Tribes request that the Juan de Fuca and SOG regulations be retain one chinook over 67cm hatchery marked NOT wild.	-

3	SFAB request that Area 29-6, 7, 9 and 10 be managed as non-retention for Chinook from May 1 st to July 15 th .	164
4	MCC requests DFO implement interim recovery goals for Fraser spring and summer 52 and 42 chinook, prior to the strategic plan completion in 2017. MCC request important increases in the terminal run size limits for Zones 1, 2 and 3 and several changes to management regulations.	157
5	QARS supports starting the 2015 for Chinook spring and summer 52 with zone 1 management and all subsequent seasons to begin in zone 1 and only increase in management zone if returning numbers of fish warrant the increase based on the Albion test fishery in-season updates.	-
6	QARS does not support Juan de Fuca proposal for 2015/16 season, request that DFO continue to implement the 2014 zone management approach.	-
7	BC Interior FN's do not support recreational management measures that increase the impact to Fraser Spring52 and Summer 52 fisheries under Zone 1 management, compared to previous years.	117, 152
8	SFC requests that DFO assess and peer review the existing management measures and evaluate the existing fishery regime with respect to conservation objectives and exploitation rate assumptions.	-
10	SFC requests DFO work with FN's to develop and implement an interim recovery and management objective for Fraser Spring 42 and Spring and Summer 52, and Summer 41 Chinook.	-
11	SFC and FRAFS FN's do not support the recreational changes to JDF and SOG by the SFAB proposal for changes in 2015.	152
12	SFC supports DFO's objectives to continue to start the management season for Spring and Summer 52 Chinook in Zone 1.	-
13	SFC requests that in Zone 1-3, no recreational fishing for salmon at the mouths of the Bonaparte and Deadman streams (similar to that applied to protect Nicole River Spring 42 chinook populations) due to persistently depressed natural population of Middle Shuswap 4sub1 Chinook.	53
14	SFC requests that for the Thompson River, from Kamloops Lake downstream to the confluence of the Fraser River, recreational chinook fishery be closed to fishing for salmon until August 21 st in Zone 1-3 due to persistently depressed natural population of Middle Shuswap 4sub1 Chinook.	-
15	SFC requests that for the Clearwater and North Thompson River recreational fishery be closed to fishing for salmon in Zone 1-3 due to recent poor escapements of Clearwater Chinook, and other spring and summer 5 sub 2 stocks in North Thompson area.	-
17	IMAWG comments spot area closures are insufficient in relation to size of protection needed to protect SOG and JS chinook. Area and time closures need to be expanded to cover the migration of these stocks of concern.	80
18	IMAWG does not support the Juan de Fuca recreational fishery changes.	79
19	LFFA – FR Spring and Summer 52 chinook management approach – if there is room for more fishing then the priority should be provided to the First Nation fisheries.	97

	20	ONA does not support the proposed changes to the marine Chinook fisheries of the Juan de Fuca proposal.	76
	21	SVIAC/Amalgamated Conservation Society (Recreational sector) support the proposed regulation change to the Fraser River Spring and Summer 52 chinook management regimen in June and July.	168
WCVI Chinook			
	1	NTC Nations support the 10% ER objective for WCVI chinook in all Canadian fisheries.	65
	2	Regarding the 3.2% ER limit/objective for WCVI chinook Area F troll fishery, NTC Nations are concerns with the in-season management based on modelling WCVI harvest and not enough resources allocated by DFO for a complete review and analysis of this approach.	70
	3	NTC request information on how conservation concerns and priority aboriginal rights fisheries for food, ceremonial, and economic purposes will be addressed by the proposed open and closed times for Area F commercial troll fisheries.	73
	4	UFAWU-Unifor requests that a gillnet chinook fishery be allowed to take place in the Nitnat Area 21, on the west coast of Vancouver Island for the 2015 season.	12
Demonstration Fisheries			
	1	Area B concerned about the implementation of the proposed Area E gillnet/shallow-seine fisheries for sockeye pink and chum – viewed to be direct competition with Area B's access to fisheries/fishing opportunities in the very same areas, at the very same time with the very same gear.	4
	2	MCC supports Area E proposals to test the utility of seine gear in demonstration fisheries in 2015.	161
	3	UFAWU-Unifor does not support the proposed Area E seine demonstration fishery. Area E is a gillnet area and it is felt that any demonstration fisheries should use the same gear type as the area commercial fishery allows.	12
Commercial Salmon Allocation Framework			
	1	SCC agrees with the initial allocation plan proposed by the CSAB, the proposed 5 year timeframe, and the new production areas being proposed (including the 26th fishery production area achieved by dividing Fraser River chum from Southern inside chum).	158
	2	SCC finds the general principles and operational guidelines useful for considering additional fishery flexibilities to harvest shares. SCC request to work jointly with DFO and CSAB on developing an evaluation framework to approve new fisheries with flexibilities.	158
	3	SFC supports in principle the changes proposed by the SCC: 1) stabilizing commercial shares, 2) flexibility to harvest shares.	53
	4	NTC supports the SCC proposal as developed in its entirety, and support further work being done to implement the SCC proposal, starting in 2005.	55
Other			
	1	QARS recommends that DFO plan for fisheries at all streams with low stream flow levels in mind to allow	-

		more fish to escape if necessary. I.e. management adjustments	
	2	IMAWG requests information on how DFO is preparing for potential extreme conditions for both low flow and temperature during freshwater migration, particularly for chinook and coho.	80
	3	NTC requests additional information before implementing the small ISBM assessment fishery near the Brooks Peninsula proposed in the IFMP.	69
	4	SFC requests that test fisheries should not opened on Early Stuart sockeye and should be delayed for Early Summer Run/Summer Run sockeye.	-
	5	LFFA – the schedule that was introduced last year and carried over by DFO this year did not make streamline nor the process any easier. It made it harder on First Nations and their organizations to properly acquire data and information and deliberate and confer to provide well informed and thoughtful responses to the many issues raised in the draft IFMP.	95
	6	LFFA request an update on the status of the recreational catches of the “net” species in relation to the Salmon Allocation Policy (5%).	98
	7	UFAWU does not support the use of VMS tracking units on gillnet vessels. Programs must be used that actually gather real data that will be useful in running sustainable fisheries. The VMS system proposed for gillnets in the 2015 fisheries will not do that.	12

Abbreviations

IMAWG – Island Marine Aquatic Working Group

LFFA – Lower Fraser Fisheries Alliance

MCC – Marine Conservation Caucus

NTC – Nuu-chah-nulth Nations

ONA – Okanagan Nation Alliance

QARS – Q’ul-Lhanumutsun Aquatic Resources Society

SFAB – Sport Fishing Advisory Board

SFC – Secwepemc Fisheries Commission

SPABC – Seafood Processors Association of BC

SVIAC – South Vancouver Island Anglers Coalition

UFAWU – United Fishermen and Allied Workers Union