



Pacific Fisheries Resource Conservation Council

Conseil pour la conservation des ressources halieutiques du pacifique

18 May 2005

Minister Geoff Regan, PC, MP  
Fisheries and Oceans Canada  
200 Kent Street, Ottawa Ontario  
K1A 0E6

Via courier

Dear Minister Regan:

**Re: Pacific Fisheries Resource Conservation Council Review of the April 2005  
draft Wild Salmon Policy Framework**

On behalf of the Pacific Fisheries Resource Conservation Council (PFRCC) I am writing to commend you and your officials on the April 2005 draft of the Wild Salmon Policy and the latest dialogue session.

I want you to know that the PFRCC was gratified that many of our comments were heard and reflected in the redraft, as well as were many comments from the other participants in the first dialogue session. In our attachment to the 22 February letter about the December 2004 draft, we summarized our recommendations on seven key themes. We are pleased to see that our first five summary comments were incorporated into the redraft in a manner that the Council judges to be acceptable to good. Those recommendations covered areas related to: the definitions of “wild salmon” and “conservation”; a better explanation of the level of protection of Conservation Units and the demes and populations that comprise them; a strengthening of the habitat protection section of the document with clarification regarding a suite of measures to protect all habitat, a recognition of the need to partner with other levels of government to successfully produce habitat plans, and more emphasis on stewardship; and, regarding enhancement and aquaculture, we appreciated the clearer description of how management would be undertaken and some acknowledgement of the risks posed by aquaculture.

Our sixth recommendation related to conducting an independent review of the effectiveness, or otherwise, of the policy and its implementation. Here we were pleased to see the commitment to the effectiveness review but found that the document was unclear as to who would undertake that review. The document first identified that there would be an independent review but then went on to say that the review would be conducted with “full public input” – thereby implying that DFO would lead the review. If the review were conducted by DFO, there could be skepticism over its results and it could negatively reflect on the Policy and the department. We remain of the view that to obtain broad public acceptance of the

findings the review best be undertaken by an independent organization.

Our last general comment on the Policy was first provided to you in our February letter and we have reiterated it since: it relates to the obvious need for additional resources to effectively implement the Policy. We were pleased to hear you say in the first dialogue session, on March 2<sup>nd</sup>, that if more funds were required, you would get them. The April draft of the Policy did not address the funding problem. We remained convinced that for this ambitious Policy to work, and to take the pressure off, not only, the salmon but also the department, more resources are required.

In closing, I again commend the department for listening to feedback on the first draft and for incorporating many significant changes into the April draft. Our advice to you is to get on with it and finalize the Policy.

Additionally we recommend that you secure the new funds from outside the current DFO budget that will be needed to effectively implement the Policy; have an independent group assess the effectiveness of its implementation; and have flexibility built into the Policy to allow for implementation amendments or even revisions depending upon the results of the independent assessment. The Policy is a big step in the right direction, and introduces many novel approaches, but at the same time should be viewed as a work in progress with the flexibility for change if change is required.

We appreciate and thank you for the effort put into this Policy and the positive changes made, to date, to better ensure it succeeds in meeting its objectives. We look forward to a release of a final Wild Salmon Policy. As you know, via the PFRCC's latest workplan, the Council remains committed to assisting with the details of how to implement portions of the Policy.

Sincerely yours,



Dr. Paul LeBlond  
Member and current Spokesperson  
Pacific Fisheries Resource Conservation Council

cc: Council Members  
Mark Saunders, Team Leader, Wild Salmon Policy  
Mr. Larry Murray, Deputy Minister, DFO  
Mr. Paul Sprout, Regional Director General, DFO Pacific Region  
Ms. Mary Hobbs, A/Regional Director Policy Branch, DFO Pacific Region