



**PACIFIC FISHERIES RESOURCE CONSERVATION COUNCIL**  
**CONSEIL POUR LA CONSERVATION DES RESSOURCES HALIEUTIQUES DU PACIFIQUE**

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29 December 2011

The Honourable Keith Ashfield  
Minister of Fisheries & Oceans  
Government of Canada  
House of Commons, Ottawa

The Honourable Terry Lake  
Minister of Environment  
Province of British Columbia  
Legislative Assembly, Victoria

Dear Ministers:

**Subject: Advisory on Wild Salmon and Steelhead and Related Priorities**

This letter serves as the final report of the Pacific Fisheries Resource Conservation Council in our role as advisors to your governments on wild Pacific salmon and steelhead stocks and habitat. It explains our perspective on matters that we believe should be the priorities among current and emerging issues. We understand the government budgetary conditions that led to the recent decision by Fisheries and Oceans Canada to end its funding of the Council and some other independent advisory bodies. With that in mind, we have proceeded to wrap up our projects this month, and felt it would be useful to offer some parting advice.

On behalf of the current and past Council members I want to express our thanks to you and your ministerial predecessors for your careful consideration of the reports we produced and the advice we offered. Our reports were intended to change public perceptions and expand understanding of salmon conservation and science, as well as influence broad strategies that underlie the government decisions that are necessary to protect and restore wild salmon and steelhead ecosystems.

Our comments and advice reflect a mixture of optimism and caution about the future of wild salmon stocks and their habitats. Nearly two years ago, in anticipation of a wind-up of the Council, we produced a report entitled "*Priorities and Strategies for Canada's Wild Pacific Salmon and Steelhead*" outlining our most serious concerns and providing a roadmap to deal with the greatest challenges. Our comments here supplement that report which we hope you will have your officials review once again.

The federal government's fisheries policy for the Pacific region has evolved to the stage of its three-fold focus on: economic benefits for British Columbians from the fisheries; conservation in light of climate change and shifting environmental conditions; and, fulfillment of the salmon conservation mandate in circumstances of reduced budgets. The Province's policy appears to mirror that approach.

We offer some observations particularly with regard to that policy. There is extraordinary economic benefit to be derived by conserving salmon stocks and habitat. It is shortsighted for some to suggest that the dollar-value of commercial fish harvest is the most significant measurement of the economic value of the salmon resource. They overlook the crucial role of salmon in First Nations traditions and fundamental community values. For a truer economic measurement, British Columbia's recreation, tourism, indigenous and outdoor industries need to be assigned a considerably higher economic proxy that accounts for real economic costs, benefits and risks. An underlying element of government fisheries policy is the application of the precautionary approach. To achieve that objective, environmental impacts on salmon and steelhead must be assigned a considerably greater weight in decisions about resource development and fisheries policies.

Our Council suggests that measures be taken to achieve the federal and provincial fisheries and environmental policy goals within three broad policy areas:

(1) Reinforcing Institutional Capacity

While eliminating some external advisory organizations, your governments still need ways in which to obtain knowledgeable, consensus-based advice. In the aftermath of the release of the Cohen Commission report in mid-2012, the federal and British Columbia governments should consider establishing an independent and transparent implementation advisory body to ensure that the Commission's findings are given full consideration and its recommendations are adopted where practicable.

The two levels of government should work together to establish ways to obtain independent advice on the direction of marine science and public education related to the fisheries. There is an obvious need to coordinate the current effort of government and academic institutions and to address the most pressing problems with attention to the contributions from traditional and local knowledge. The recent proposal for a marine science and education advisory board should be given serious consideration.

With the continuing budget constraints, DFO and BC fisheries officials will need to rely more on initiatives in First Nations, the private sector and NGOs. An appropriate measure would be for DFO to assign a greater proportion of funds from the fishing license stamp to enable the Pacific Salmon Foundation to play a more

active role. The re-allocation of funds to conservation through the license stamp, perhaps at a higher overall fee, would permit a fitting contribution from those who benefit directly from the Foundation's valuable habitat and stock restoration programs.

## (2) Strengthening Salmon Programs and Initiatives

The PFRCC has been a consistent and outspoken supporter of the Government of Canada's Wild Salmon Policy since its inception. The slow pace of the policy's implementation has been frustrating, as has the reluctance or inability of DFO to provide levels of annual funding that would enable the Wild Salmon Policy to achieve its considerable potential for the protection of salmon stock diversity. We also point out that the Wild Salmon Policy has lacked a champion within DFO, and that it needs an enthusiastic driving force to make its implementation fully effective.

The encouragement of new initiatives, such as the Salmon Strongholds Partnership, could permit DFO to deal more effectively with salmon management in the green-zone categories of the Wild Salmon Policy to ensure that the most crucial salmon habitat is assigned a long-term priority. Another project worthy of consideration is the International Year of the Salmon that would give Canada a leading role in enabling scientists and fisheries managers from around the globe to share their knowledge.

It is notable that many fisheries scientists have begun to work across their species specializations and academic disciplines in co-operative projects that draw the array of expertise needed for salmon ecosystem analysis. This trend towards building coherence in the fisheries science agenda needs to be encouraged as does the knowledge exchange that helps identify and test the applications of research findings in salmon management programs, especially responding to climate change.

## (3) Making Choices

The recent reallocation of herring catch quotas illustrates the considerable change in fisheries decision-making towards financial returns and away from ecosystem and conservation considerations. A rebalancing of factors in fisheries resource decisions, like the ones made for herring, needs to account for local conditions and ecosystem shifts, and assign tangible values to precaution. It would be useful, in this instance, for the DFO science agenda to include a study of resident herring to ensure long-term viability.

Also vital in terms of priority-setting for wild Pacific salmon and steelhead is the adoption of an ecosystem approach in research programs to supplement the long-standing treatment of salmon as separate stocks and species, or viewing them from a narrow biological viewpoint. The repositioning of salmon conservation science and management from an ecosystem perspective in cross-disciplinary projects is necessary for comprehensive salmon abundance and survival solutions. Smart evidence-based decisions require the adoption of this ecosystem approach.

In conclusion, our Council members wish to thank the many staff members, consultants, First Nations participants, fish harvesters and conservation advocates who have worked with us and enabled us to achieve our mandate. We are also grateful for the cooperation and support we received from staff of Fisheries and Oceans Canada and the various British Columbia ministries responsible for fisheries conservation.

It has been reassuring to note that the Pacific Salmon Foundation has agreed to provide public access to all of our Council's reports through its website ([www.psf.ca](http://www.psf.ca)). We are confident that these PFRCC reports will continue to constitute a valuable body of work and ideas for future reference.

Yours sincerely,

Jeff Marliave, PhD  
Chair