



Comments on the 2016/2017 Integrated Fisheries Management Plans (IFMPS) for Salmon

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1. General IFMP Issues:

Fishery Monitoring and Catch Reporting

The MCC recommends that the IFMP:

- Provide a list of the recreational and commercial salmon fisheries to be evaluated by the Risk Assessment Framework (as discussed in the meeting this might be the fisheries currently identified in the IFMP).
- Inform readers that evaluations will be open to interested stakeholders and First Nations, and that dates and times of evaluations will be sent out via DFO notices (managed by the consultation secretariat)
- Allow for a period of public comment (60 days?) after each evaluation is completed
- Provide a list of the fisheries that have been evaluated, including links to the evaluations, along with whether they have been identified as requiring low, generic, or enhanced monitoring.
- Inform readers that DFO will work with the IHPC to prioritize those fisheries requiring enhanced monitoring, and set a timeframe for

implementation of a monitoring regime that incorporates the five principles set out on pages 7-11 of the Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries.

- Conservation and Protection has the responsibility to “Monitor and support at-sea observers and dockside monitors to ensure accurate catch monitoring and reporting”, and “Set priorities and direct compliance efforts where there is a risk to salmon stocks of concern”.
- The IFMP should set out the guidance and standards C&P has provided on how it will measure and enforce compliance. C&P should also set out what level of at-sea coverage will be required to ensure compliance in Johnstone Strait, Gulf of Georgia, and Fraser River commercial fisheries, and Juan de Fuca and Gulf of Georgia recreational fisheries that require the release of non-target species.

Commercial Salmon Allocation Framework:

- The IFMP should confirm that all Demonstration Fisheries will require additional consultation involving local or regional First Nations and stakeholders before they are initiated in 2016.
- The IHPC/IFMP process fails to provide adequate opportunities for interests other than the commercial proponents (First Nations and CSAB) to understand the proposed fisheries and provide informed advice. The IFMP should direct managers to consult with other affected people and identify that the proposed fisheries may be cancelled, delayed, or amended based on the outcome of these consultations.
- Further, the IFMP should confirm that DFO intends to work with First Nations and stakeholders to develop local or regional bodies in coordination with the revised Commercial Salmon Allocation Framework. The IFMP should provide examples of what these new types of advisory bodies may look like, such as the Somass or Cowichan Round Tables, or through conference call/Webex.

2. Southern BC IFMP issues

Fraser River Demonstration Fisheries

The MCC opposes any new Demonstration Fisheries that will potentially increase cumulative total mortalities on Upper Fraser steelhead or IFR coho.

Juan de Fuca / Sooke Basin Seapen rearing proposal for Chinook

We understand the need and desire to increase Chinook availability, including for Southern Resident Killer Whales; however, we have concerns about whether this proposal would ultimately increase Chinook abundance (which may lead to increased fishing pressure on wild populations), or more importantly, negatively affect such abundance by contributing to adverse ecological interactions between wild and enhanced salmon. These potential interactions include:

- competition between hatchery and wild fish (evidence suggest hatcheries replace, rather than supplement, wild salmon)
- such competition could occur with Fraser River and other Salish Sea Chinook salmon populations that are known to be important in the diets of Southern Resident Killer whales,
- the potential for disease and parasite amplification in net pens,
- straying of hatchery-reared Chinook into spawning streams with wild populations leading to competition
- straying of hatchery-reared Chinook into spawning streams with wild populations leading to genetic introgression and reduced fitness in offspring
- increased dependence of fisheries on artificial production

Furthermore, this approach is not consistent with Canada's Wild Salmon Policy.

Interior Fraser River (IFR) Coho and Fraser stream-type Chinook

IFMP statement on the State of the Pacific Ocean and Freshwater Environmental Conditions:

"Extremely warm water temperatures were observed in the central NE Pacific Ocean throughout 2014 and continued in 2015. In addition, El Nino conditions are also expected to influence the Pacific in 2016. Environmental conditions and associated uncertainties may require discussion of potential additional adjustments to the fisheries management approaches that are outlined in IFMPs to achieve conservation and management objectives."

- The MCC believes the above statement needs to be accompanied by action in fisheries where harvest takes place in advance of adequate in-season stock assessment information. Harvest restrictions on recreational fisheries for Interior Fraser River coho, in particular, must be incorporated in the IFMP.

IFR Coho

- Recreational effort in San Juan and Georgia Strait for coho should be monitored and restrictions if effort increases over the pre-2014 period. Curtailed recreational fisheries in Washington State, along with the low Canadian dollar, are expected to attract additional recreational effort, and harvest impacts, on chinook and coho stocks of concern. The IFMP needs to account for this.
- Harvest restrictions on IFR recreational fisheries for coho, in particular, need to be increased to maintain them at 3%.
- The proposal to reallocate 200,000 Fall Chinook smolts from Quinsam River hatchery to Puntledge River Hatchery should be accompanied by an estimate of additional harvest impacts it may impose on IFR coho.
- Recreational effort in Juan de Fuca and Georgia Strait should be monitored and restrictions expanded if effort increases over the 2014 period. There is concern that poor fishing opportunities in the US, along with the low Canadian dollars, will attract additional effort, and harvest impacts, on Chinook and coho stocks of concern.

Stream-type Chinook

- There is little fishery independent data on encounter rates and fishery related mortalities of Fraser *Spring 4₂*, *Spring 5₂*, and *Summer 5₂* Chinook. The IFMP should require that fisheries that impact depressed Fraser and South Coast Chinook stocks have fishery independent monitoring programs in place that would generate scientifically defensible encounter and total mortality rate information. The IFMP should describe total mortalities as being comprised of some combination of immediate mortality associated with either harvest or release, drop-offs, drop-outs, depredation, predation after release of disoriented or injured fish, and pre-spawn mortality due to disease or injury related to catch and release.
- The IFMP should state that more knowledge on mortality rates is required for released Chinook stocks of concern. This information should be used to develop future management actions.
- Based on current DNA data, recreational fishing for chinook should be closed in Areas 19 and 20 during May, June, and July.
- There should be a recreational closure in the "banana" area of Area 29 through to August.
- Chinook harvest impacts should assume that FSC harvests will be higher than anticipated due to the expected low abundance of sockeye, and FSC window closures.
- The 2016 Outlook for southern BC Chinook salmon indicates that many stocks of concern are expected to return at low levels, including Fraser Spring and Summer 4₂ and 5₂ populations. The IFMP must include language that identifies precautionary measures and rebuilding objectives.
- In 2015, the MCC proposed that the management reference points for Fraser Spring and Summer stream-type Chinook be changed so that the terminal run size and probability of rebuilding, are increased. In the face of (likely) low marine survival, uncertain

environmental conditions, and the depressed nature of these populations, we again recommend the 2016 IFMP adopt more sustainable targets. Such a move would demonstrate that the management priority for these populations is rebuilding by minimizing direct or indirect impacts.

Fraser Sockeye

- The MCC supports Option 2 with the additional one-week closure to protect Early Summer sockeye.
- Further, the late run LAER should be reduced to 10% to reflect the expected very low abundance, and the fact that their escapements in the past two years were much lower than forecast.
- The Table on page 281 should be extended to compare expected returns relative to the individual stock's WSP benchmarks. It is not helpful, for instance, to show the Bowron population as 'green' relative to its cycle year escapement when it's brood year escapement was 59, and its expected escapement will be a fraction of both its cycle year and all cycle escapement. The classification of the late run by colour is similarly misleading.

3. Northern BC IFMP Considerations:

Compliance Monitoring in Gillnet and Seine Fisheries

- The IFMP needs to describe how C&P, as is their responsibility, has assured the at-sea observer program will "Monitor and support at-sea observers and dockside monitors to ensure accurate catch monitoring and reporting", and "Set priorities and direct compliance efforts where there is a risk to salmon stocks of concern".
- The IFMP needs to state that, consistent with National Policy, the service provider will make at-sea observer data available to the Department for in-season management. Further, the IFMP should state that DFO will make this information (while addressing privacy concerns) available to stakeholders along with other relevant in-season management information.

Sockeye

- The IFMP should provide PSF-produced benchmarks relative to expected returns of wild and enhanced sockeye populations.
- The North Coast IFMP should, as does the South Coast IFMP, provide some understanding of the status, expected abundance, and expected abundance relative to historical abundance/escapement. Current abundance/escapements should be shown relative to abundances or escapements pre- and post-enhancement.
- There is evidence that Alaskan harvests can have a significant impact on late timing Skeena populations. The IFMP should identify that larger than average Alaskan catch or effort after week 30 might affect Skeena sockeye fisheries after the fourth week of July.
- Directed sockeye fishing should be curtailed after week 7-4 to protect late-timed sockeye and chum returning to the Skeena watershed.
- Consistent with the 2016 Wuilkinuxv Nation's position on Rivers Inlet Sockeye, we do not support a commercial fishery on these fish until consecutive years of rebuilding have been demonstrated.

Pink

- The Skeena sockeye return is anticipated to be poor in 2016. There could, however, be a harvestable pink salmon surplus. The IFMP should identify the need for scientifically defensible estimates of encounters, compliance, and mortality of Skeena sockeye if a non-retention fishery is implemented. The IFMP should require that the fishery be evaluated, and a monitoring program instituted, that is compliant with the **Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries** before such a

fishery is permitted.

- If industry is not compliant with the Policy, 100% observer coverage should be required due to the by-catch of populations of extreme concern that will be encountered in this fishery.

Chum

- Chum salmon in the Skeena River, Nass River, and areas of the Central Coast continue to be stocks of concern, and actions will continue to be required to limit impacts on these stocks in fisheries for other species.
- Recent research in Area 6 suggests that chum survival in non-retention seine fisheries is improved if chum by-catch is carefully handled and returned to the water in less than two to three minutes. It is recommended that the IFMP confirm that at-sea observers will record how long by-catch remains on deck before being discarded.

Steelhead

- The IFMP should require that all Area 8 chum fisheries have sufficient fishery independent observer data to produce scientifically defensible estimates of fleet-wide steelhead encounters and releases. The IFMP should state that this information will be employed in the planning of future fisheries.
- It is recommended that the IFMP identify the need for a mortality study for steelhead released in commercial fisheries. This information, along with improved encounter rate data, will allow DFO, industry, First Nations, and stakeholders to consider what future management actions may, or may not, be required.