



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

April 24, 2017

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

VIA EMAIL ATTACHMENT

RE: April 4 -6 FORUM ON CONSERVATION AND HARVEST PLANNING

Dear Rebecca Reid,

Thank you and your staff for the detailed response to the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*. The detailed letter was received April 5, 2017 and posted immediately to the FRAFS website. The amount of time it took to exchange letters between Forum participants and the Department this year was concerning, and resulted in lost opportunities to further some pre-season discussions. Despite this process-related issue, the April forum fulfilled its purpose as outlined in the Forum Terms of Reference (<https://www.frafs.ca/Forum>). **This letter outlines recommendations, advice, and actions requested of the Department by Fraser and Island/Marine Approach First Nation forum participants. It is anticipated that this feedback be considered in this season's South Coast Salmon IFMP consultation process.**

General Discussion with respect to IFMP Feedback from January and March Forums

As was noted in both the January and March Forum letters, participants observed that the Draft IFMP did not include recommended content for providing detailed catch monitoring, fisheries and stock assessment plans for the 2017-2018 timeframe. Without those details, it is not possible to provide complete advice and recommendations with respect to pre-season and post-season fishing plans.

Fraser sockeye:

Early Stuart & Early Summer Sockeye Window Closure: There was general support for a one week extension of the approximately three-week Early Stuart window closure.

Terminal fisheries/aggregate management: Participants discussed the challenges associated with aggregate-management related to terminal fisheries and recommended the following principle as a pilot initiative for 2017: **In each terminal area where there could be a harvestable surplus, harvest a specific number of fish with the understanding the harvest will not affect the aggregate TAC among First Nations in non-terminal fisheries that would otherwise be available. This initial number of fish for terminal fisheries would be subject to in-season adjustments.**



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Escapement Options 1 and 2: Participants expressed concerns with both Options and noted the inadequate time available to understand how the two Options would impact stocks in their local areas. It was also unclear why the Department would propose Options that conflict with Wild Salmon Policy benchmarks. **Please clearly explain the rationale used to develop Option 1 and Option 2, and include specifics on why Options were presented that would result in weak stocks (Bowron, Quesnel) returning below the lower Wild Salmon Policy biological benchmarks.**

Early Stuart sharing: First Nations are collaborating on recovery of Early Stuart sockeye and with this in mind, **participants recommended no directed Early Stuart fisheries** at projected run sizes, with allowance for some small terminal harvest for communities that cannot access other stocks.

FSC sockeye other than Early Stuart: Participants identified several challenges with the Department's proposal to reduce a pro-rated share of TAC among the Marine, Lower Fraser, and BC Interior areas if there is not enough TAC to support catching the total FSC license amounts. **Please explain how the Department intends to manage the shares that have been allocated, given geographical challenges (ex. few sockeye will make it beyond the Chilko confluence). Support this explanation by providing an historical performance review of TAC sharing since at least 2011 (ideally for as long of a time series as possible), in the winter of 2017/2018. The performance review should clearly show the yearly planned sharing proportions, and the post-season final sharing proportions.**

Proposed sockeye LAER's: In order to provide feedback on the Department's proposed LAER's, participants need to know whether the Department's management approach has resulted in LAER's being met in the past, and whether changes in exploitation rates associated with LAER changes are measurable. **Participants request that the Department design a performance review of LAER's in collaboration with First Nations (ex. JTWG) for as long of a time series as possible. The performance review should clearly show the resulting exploitation rates under planned LAER's, the distribution of impacts by fishery, and how LAERs compare to the WSP guidelines.**

Since FSC needs are not being met, concerns were also raised with the proposed LAER (equal to, or greater than 20%) on Late run sockeye.

Sockeye forecast level p25 and p50: In the *March 7 -9 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*, forum participants asked for an explanation of why DFO presented a less precautionary planning approach given the advice from Science (p25 forecast was recommended by Science, rather than the midpoint p50 forecast). Unfortunately, a response has not been provided by the Department. Without additional insight from DFO, forum participants were left wondering why the Department didn't issue a more precautionary forecast, since the Fraser Panel and U.S. will plan fisheries based on the p50. **Please explain why the Department chose to put forward a less precautionary forecast.**



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Chinook:

Zoned Approach for Fraser Spring/Summer 5(2): Forum participants cannot support the Department's current Zoned Approach, in part, because of outstanding technical questions regarding the distribution of exploitation rate reductions among sectors. Participants anticipate that these questions may be addressed through the "Review of Fraser River Chinook Management Approach" and urge the Department to proceed with this Review.

As well, it was recommended that given inadequate sockeye returns to meet FSC needs, First Nations will rely more on chinook. The Department should establish a "Zone Zero", and manage for no directed recreational or commercial fisheries until FSC needs are met.

Chinook Spring 4(2): As stated at last year's April forum, it was again stated: Please remove the term "incidental" from the Spring 4(2) objective.

Chinook Summer 4(1): As stated at last year's April forum, it was again stated: To accommodate First Nation access to Chinook, given the low expectations for sockeye returns, there will need to be a substantial decrease in non-FSC fisheries targeting these stocks.

Forum participants recommended that the Department reduce marine recreational and commercial access to Chinook unless the Department can provide DNA data showing that these fisheries are not impacting these stocks and FSC access.

Coho:

While there was no consensus recommendation regarding the Department's proposed Interior Fraser Coho (IFC) objective, modifications to current management practices were discussed. Discussions were motivated in part by the Department's continued assertion that by-catch is not allocated. However, the planning process for IFC impacts is an allocation process, which would need to be consistent with the Aboriginal priority set out in Sparrow. **Fisheries management measures should reserve all IFC impacts exclusively for FSC fisheries. There is interest in directed Interior Fraser Coho harvest in terminal and near-terminal areas, as well as incidental IFC impacts associated with FSC fisheries.**

Concern with the lack of information on lower Fraser Coho has been raised repeatedly by participants over the years and there is also a strong interest in gaining more knowledge of Lower Fraser Coho.

Pink:

Forum participants cannot support "the 1% rule" without understanding the conservation and allocation implications of harvesting into, or beyond, the sockeye LAER. A more thorough discussion was needed on the technical aspects and implications to all by-catch (i.e. Interior Fraser and Lower Fraser



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Coho, Steelhead etc.) of the Department's proposal. Future discussions should include a performance review of the effectiveness of achieving LAER targets.

Chum and Steelhead:

In the *January 24 - 26 2017 FORUM ON CONSERVATION AND HARVEST PLANNING Letter*, the Department stated the "intent to work with First Nations...on management approaches for salmon fisheries where Steelhead might be impacted". Forum participants noted the extreme conservation concern with Thompson and Upper Fraser steelhead, and the lack of decisive action by the Department to redress this concern. Concerns with the Steelhead model were raised by First Nations, yet there have been no changes to the Steelhead management approach proposed this season. First Nations are not requesting management actions, such as closing Chum fisheries at this time. In order to fully understand the implications of making any recommendations on management approaches, a better understanding of how impacts are calculated is needed. **First Nations continue to stress the need to be involved with both the Federal Department and the Provincial Government, in all aspects of steelhead planning.**

We look forward to the Department's timely response to this letter, as well as a response to the *March 7th – 9th 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.**

Respectfully,

Ken Malloway, FRAFS Chairperson,
On behalf of First Nation participants at the April 4,5,6, 2017 Forum on Conservation and Harvest Planning

CC:

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