

Summary of Feedback Received by DFO in consideration for the 2019/2020 Chinook Management Approach

March 2019

Note: This table is intended to provide a high level summary of feedback received on the proposed Fraser Chinook management approach outlined in the Department's Feb. 5, 2019 letter and highlight key issues raised to facilitate discussion. The table is not intended to be a comprehensive or fully detailed representation of all of the feedback received. 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.

This table includes feedback received from First Nations and the Department's official consultative bodies, a large volume of feedback was also received from individuals and other organizations. Common themes from this feedback is listed separately at the end of this document.

For full feedback statistics, refer to Page 7.

Sector	Group Name	Region	Key Issue
Commercial	Riverfresh	Fraser River Watershed	Proposed closure of the demonstration fishery, despite having no impact on stocks of concern, would undermine the commercial fisheries access element of the PICFI intended to provide FN with greater access to commercial fishing opportunities - 96% of catches in years testing was done were summer 4-1 chinook (not at risk)
Commercial	Riverfresh	Fraser River Watershed	Kamloops Lake demonstration fishery should be accorded the same opportunity as the area F troll fishery - we propose the same allocation reductions and that the fishery remain closed until Sept 4
Commercial	Riverfresh	Fraser River Watershed	Economic impact of a closure to this commercial fishery would be devastating
Commercial	Area G Troll Harvest Committee	WCVI	Impact in a May fishery on early run chinook is very minimal and we are requesting a May fishery for 100% percent of our pre-season TAC
Commercial	Area G Troll Harvest Committee	WCVI	Reduction in the recreational catch limits from 2 to 1 a day in June and July
Commercial	Area G Troll Harvest Committee	WCVI	Reduce the overall chinook annual limit to 10 per year (recreational licence)
ENGO	MCC	All	Scenario A approaches the necessary actions to protect endangered Fraser River Chinook salmon
ENGO	MCC	All	Scenario B clearly in conflict with federal conservation policy and all credible definitions of sustainable fishing
ENGO	MCC	All	Unlikely that a fishing mortality cap of 10% can be achieved - problem is further compounded by increasing evidence that the estimates of Fishing Related Incidental Mortality (FRIM) used to calculate total fishing mortality are too low
First Nation	Okanagan Nation Alliance	Fraser River Watershed	Unsupportive of proposed scenarios – too similar to FN forum recommendations from March 2009
First Nation	Stellat'en	Fraser River Watershed	Some consideration or a major study should be done to see if there is a connection between chinook declines and fish farms
First Nation	Stellat'en	Fraser River Watershed	No mention of water environment and climate change which may or may not affect the chinook population
First Nation	FRAFS	Fraser River Watershed and Marine Approaches	Need for increased transparency, timely information sharing, sufficient consultation and management decisions accountability
First Nation	FRAFS	Fraser River Watershed and	As long as there are conservation concerns, and until First Nations FSC needs are met, no other fisheries should be allowed to impact the stocks or runs of concern

		Marine Approaches	
First Nation	FRAFS	Fraser River Watershed and Marine Approaches	All recreational salmon fisheries that may impact Fraser Chinook must be managed in a closed until-open regime
First Nation	FRAFS	Fraser River Watershed and Marine Approaches	Fraser Chinook Zoned Approach Framework should include a Zone "0", a management scenario that closes all fisheries except for rights-based fisheries that would be invoked in situations of conservation concern
First Nation	UFFCA; Takla Nation; Carrier Sekani Tribal Council; Tsilhqot'in National Government; Saik'uz First Nation; Esk'etemc; Northern Shuswap Tribal Council	Fraser River Watershed	Supportive of management limiting overall 2019 exploitation rates to less than 5% for the Upper Fraser Spring 5 ₂ and less than 5% for the Upper Fraser Summer 5 ₂ Chinook
First Nation	UFFCA; Takla Nation; Carrier Sekani Tribal Council; Tsilhqot'in National Government; Saik'uz First Nation; Esk'etemc; Northern Shuswap Tribal Council	Fraser River Watershed	Fisheries monitoring and assessment must be increased to provide defensible evaluation
First Nation	UFFCA; Takla Nation; Carrier Sekani Tribal Council; Tsilhqot'in National Government; Saik'uz First Nation; Esk'etemc; Northern Shuswap Tribal Council	Fraser River Watershed	2019 Chinook Conservation measures must show proof of both extreme conservation and priority allocation
First Nation	UFFCA; Takla Nation; Carrier Sekani Tribal Council; Tsilhqot'in National Government; Saik'uz First Nation; Esk'etemc; Northern Shuswap Tribal Council	Fraser River Watershed	Unsupportive of management measures: exceeding 5%, without effort control in the marine recreational fisheries, that include partial or full mark selective fisheries, that allow shifting of fishing effort between management areas, that maintain marine recreational fisheries open unless closed, that lead to overharvest and conservation concerns, and that increases the Interior Fraser Coho exploitation rate above the 3-5%
First Nation	Kwikwetlem First Nation	Fraser River Watershed	Scenario A and B are not robust enough measures to protect chinook stocks and ensure that cultural and inherent rights and practices are respected
First Nation	Kwikwetlem First Nation	Fraser River Watershed	Close all chinook fisheries, whether retention or catch-and-release, which includes all recreational fishers - if there is to be a scheduled fishery, it should only be for First Nation FSC purposes
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	During periods of extreme conservation, allowing commercial and recreational fisheries to incur mortality in an infringement of our S35 rights described in the Constitution of Canada
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	All fisheries impacts must be eliminated from commercial and recreational before First Nations are reduced
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	Implement a Zone 0 approach such that only impacts to chinook are from FSC fisheries
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	All recreational salmon fisheries that may impact Fraser Chinook must be managed in a closed until-open regime - DFO must warrant any openings with sufficient justification that there is an appropriate plan to support opening
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	Improve the accuracy of chinook total mortality estimates in directed fisheries - update current estimates of fishing-related incidental mortality based on recent research
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	Update creel monitoring and sampling study design to improve representativeness of incidental mortalities in the estimates
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	Apply a maximum size limit for retention
First Nation	Secwepemc Fisheries Commission	Fraser River Watershed	If tools are not in place to evaluate the mortalities in a recreational fishery then the fishery must remain closed

First Nation	Musqueam Indian Band	Fraser River Watershed	Despite our efforts to protect these stocks, and the fact that FSC needs have not been met in decades, DFO continues to permit year-round recreational salmon fishing that kills these fish while we try to protect them
First Nation	Musqueam Indian Band	Fraser River Watershed	Deep and meaningful consultation should include open and clear discussion of all objectives and constraints being considered in the decisions, which has not been the case
First Nation	Musqueam Indian Band	Fraser River Watershed	There should be no fishing mortality allowed in the commercial and recreational fisheries
First Nation	Musqueam Indian Band	Fraser River Watershed	The proposed measures are not adequate for conservation nor do they meet First Nation priority objectives
First Nation	High Bar First Nation	Fraser River Watershed	Take more decisive action by shutting down both commercial and recreational fishing in the marine areas from January to the end of July
First Nation	High Bar First Nation	Fraser River Watershed	Unsupportive of management measures: exceeding 5%, without effort control in the marine recreational fisheries, that include partial or full mark selective fisheries, that allow shifting of fishing effort between management areas, that maintain marine recreational fisheries open unless closed, that lead to overharvest and conservation concerns, and that increases the Interior Fraser Coho exploitation rate above the 3-5%
First Nation	LFFA	Fraser River Watershed	Implementing either of the proposed chinook fishery management scenarios will continue efforts to extinguish the culture of Lower Fraser First Nations
First Nation	LFFA	Fraser River Watershed	Deep and meaningful consultation should include open and clear discussion of all objectives and constraints being considered in the decisions, which has not been the case
First Nation	LFFA	Fraser River Watershed	Both scenarios presented include continued fishing by the recreational fishery in areas where these chinook stocks are present - these measures are not adequate for conservation nor do they meet First Nation priority objectives
First Nation	LFFA	Fraser River Watershed	Fisheries constraints for Summer 4.1 and Fall 4.1 chinook must be taken in recreational and commercial sectors - if further reductions are required for Summer 4.1 and Fall 4.1 following the complete elimination of impacts from recreational and commercial fisheries, then First Nations rights-based fisheries reductions may be considered
First Nation	LFFA	Fraser River Watershed	Lower Fraser First Nations must be allowed to continue their fundamental cultural practices of FSC fishing, otherwise the culture will be lost
First Nation	LFFA	Fraser River Watershed	LFFA has submitted alternate Chinook management scenarios – refer to full letter to review scenarios
First Nation	Namgis	Johnstone Strait	Closure to recreational fishery (Area 11 and 12) from April 1 - July 31; coming back into effect the Tues following Labour Day and remaining closed until July 31 annually (11 month closure until Nimpkish River chinook stocks return to a sustainable level)
First Nation	Namgis	Johnstone Strait	During the month of August until Labour Day each year, chinook would be open to recreational fishing with a daily limit of 1 chinook/day and an annual limit of 5 chinook (Area 11 and 12)
First Nation	Namgis	Johnstone Strait	Non-retention fishing will still result in a percentage of fish dying - implement closures instead
First Nation	A-Tlegay Fisheries Society	Johnstone Strait	2018 preliminary results reflective in the recreational fishery catch data leads us to believe that the flexibility and opportunity provided to the recreational fishery must warrant consideration of management actions and methods that go beyond reduced daily limits/possession limits and hatchery-marked Chinook retention
First Nation	A-Tlegay Fisheries Society	Johnstone Strait	Support Scenario A over B, however, the Scenario A management table is vague and does not allow us to fully understand the full suite of actions
First Nation	A-Tlegay Fisheries Society	Johnstone Strait	Unsupportive of: Mark-selective fisheries and increased rates in incidental release mortality as a result of sorting catch for a marked Chinook; Opportunity for recreational terminal harvest in Area 12, 13, and 14; Area closures that allow for the recreational fishery effort to mobilize to other areas and effectively maintain fishing pressure or increase fishing pressure on the same or other Chinook stocks; Year-round opportunity for the recreational fishery that has proven ineffective for management of catch and effort

First Nation	A-Tlegay Fisheries Society	Johnstone Strait	Recreational fishery for Chinook should be managed on a 'closed until open' basis
First Nation	A-Tlegay Fisheries Society	Johnstone Strait	Department should exercise its duty to first conserve Chinook and the species coastal biodiversity, and second not infringe upon the rights of First Nations access and opportunity to utilize Chinook as FSC
First Nation	Sc'ianew	Juan de Fuca	Proposed restrictions in scenario A and B would have negative impacts on the community - loss of jobs for band members
First Nation	Sc'ianew	Juan de Fuca	Request that the SRKW closed area boundary at the east end of the refuge be moved westward from Otter Point to Sheringham Point and that the regulations within the refuge area be amended to no salmon fishing from no fin fish fishing
First Nation	Island Marine Aquatic Working Group; Malahat Nation	Strait of Georgia	Given the circumstances, there should not be allowed any non-priority harvest following the Precautionary Approach
	Island Marine Aquatic Working Group; Malahat Nation	Strait of Georgia	If the harvest of these stocks to continue, based on the projected recruit per spawner information that has been provided, it likely will mean listing under SARA and a complete shutdown of the fishery
First Nation	Island Marine Aquatic Working Group; Malahat Nation	Strait of Georgia	Island Marine Aquatic Working Group and Malahat Nation have submitted alternate Chinook management scenarios – refer to full letter to review scenarios
First Nation	QARS	Strait of Georgia	Any management actions should not restrict First Nations FSC fisheries until and unless all other fishery sectors have been completely closed
First Nation	QARS	Strait of Georgia	Recommended that recreational fishing (both retained and catch-and-release) for chinook salmon be closed in all areas that can have an impact on these stocks of concern - no salmon fishing
First Nation	QARS	Strait of Georgia	Address how DFO will evaluate the outcomes of the management measures or how DFO will enforce the management measures
First Nation	QARS	Strait of Georgia	For 2019, all Fraser chinook fisheries except for First Nations rights-based FSC fisheries should be closed
First Nation	Maa-nulth Treaty Society	WCVI	Expect full and meaningful consultation on all the matters set out in your letter. We ask that representatives from Fisheries and Oceans Canada contact us as soon as possible to coordinate providing us with the information necessary to understand the decisions that Canada is going to make and to determine meeting dates for that consultation
First Nation	Maa-nulth Treaty Society	WCVI	Expect that any concerns we raise at those meetings will be given serious consideration by Fisheries and Oceans Canada and will be demonstrably integrated into any decisions
First Nation	Maa-nulth Treaty Society	WCVI	Fisheries and Oceans Canada must change how it deals with the Maa-nulth First Nations
First Nation	T'aaq-wiihak Nations	WCVI	Rebuilding stocks in the Cautious zone as opposed to waiting for a Critical zone designation
First Nation	T'aaq-wiihak Nations	WCVI	Consider cumulative risks in addition to fishing such as salmon aquaculture
First Nation	T'aaq-wiihak Nations	WCVI	Consider habitat destruction by forestry operations when developing rebuilding strategies
First Nation	T'aaq-wiihak Nations	WCVI	The scenarios group the five Nations with the commercial sector and provide priority to the recreational sector on the WCVI - the Nations' aboriginal right has constitutional priority over other users
First Nation	T'aaq-wiihak Nations	WCVI	Do not agree with scenarios that involve delineating management of our fleet by vessel size
First Nation	T'aaq-wiihak Nations	WCVI	T'aaq-wiihak trollers should fish prior to August 1st, as with other vessels in the fleet - During periods of greater conservation concern, vessel caps and other management efforts, determined collaboratively between DFO and T'aaq-wiihak staff, can be implemented to limit impacts to stocks of concern
First Nation	T'aaq-wiihak Nations	WCVI	The recreational fishery is now responsible for the largest catch on the WCVI with the lowest standard for monitoring and only a notional allocation
Recreational	SFAB	All	Scenario A would result in complete and permanent devastation of the British Columbia public recreational fishery resulting in significant and

			immediate impacts including the near elimination of the \$1.1 billion in revenues that help support coastal communities and the well over 9,000 people employed in the sector
Recreational	SFAB	All	Plunging thousands of people into personal financial crisis would be the outcome of Scenario A
Recreational	SFAB	All	Alternate measures or suites of measures available to protect the stocks of concern in those areas where the stocks are more prevalent than those presented in Scenario A - some measures proposed in Scenario A are not necessary
Recreational	SFAB	All	Angling public and its service infrastructure have becoming increasingly aware of sample options presented and the sector is beginning to suffer the impacts of uncertainty as it regards to opportunity
Recreational	SFAB	All	SFAB has submitted alternate Chinook management scenarios – refer to full letter to review scenarios

SFAB – Sport Fishing Advisory Board

WCVI – West Coast Vancouver Island

QARS – Q’ul-Lhanumutsun Aquatic Resources Society

LFIA – Lower Fraser Fisheries Alliance

FRAFS – Fraser River Aboriginal Fisheries Secretariat

MCC – Marine Stewardship Caucus

UFFCA – Upper Fraser Fisheries Conservation Alliance

TAC – Total Allowable Catch

AABM – Aggregate Abundance Based Management

ISBM – Individual Stock Based Management

FN – First Nations

The department also received a large volume of feedback from individuals and organizations. Below is a summary of the common themes raised:

ENGO – Form Letter from Individuals:

- Encouraged to see that DFO is considering strong actions to protect endangered chinook
- To ensure a five per cent cap on fishing mortality, DFO must use the latest science on release mortality, especially from the difficult to regulate recreational fishery
- Reject Scenario B which allows for significant targeted fishing on COSEWIC-listed, endangered chinook salmon

Recreational Fishery – Individuals and groups

- High negative economic impact of Scenario A on Vancouver Island and lower mainland
 - Sport Fishing GDP reached \$389.8 million in 2016 showing a year over year increase of 5.8%
 - Between the year 2000 and 2016, the real GDP increased by over 50%
 - Services provided to the Sport Fishing Industry accounts for nearly \$200 million in GDP
 - The Sport Fishing Industry employs more than 9000 people
 - Total revenues related to the Sport Fishing Industry is estimated at \$1.1 billion
- Must control sea lion and seal populations
- Consider additional opportunity to retain adipose fin-clipped chinook (2 chinook per day, only 1 of which can be unmarked)
- Annual sport fishing chinook limits should be cut back to 10 per season
- The Department is not addressing problems around environmental issues, predators, pollution, enforcement, hatchery management or salmon farming
- Increase the Salmon Conservation Stamp Fee
- Mark 100% of Canadian hatchery origin chinook (Suggestion made to consider partnering with local colleges and universities and leverage educational opportunities to defray the incremental labour costs)
- Herring being overfished by the commercial sector
- Eliminate farmed salmon production from open net pens
- Need immediate increase in Chinook hatchery production
- Proposed management measures not backed up by catch-data, lacks scientific based evidence

Other: coastal communities / local government / chamber of commerce

- Negative impact on tourism industry which will cause economic harm to all sectors in small communities
- Scenario A would destroy the very funding mechanism and army of dedicated citizens that can address this long term issue for salmon stocks
- Local residents would not have access to Chinook for food purposes
- Move towards mandatory marking of all hatchery Chinook
- Conservation benefits of scenario A would be negligible but the socio-economic impacts would be catastrophic
- Scenarios A and B would have negative impacts on coastal communities including our reputation as a sport fishing destination and on the economies of local communities across the Province
- Consider the wisdom and experience of the communities who live on these waters: the First Nations, the fisherman, the guides, the biologists, the streamkeepers

- Decision needs to be based on sound Science

Feedback Statistics:

Sector	Total Number of Letters (As of March 6, 2019)
First Nation	26
Recreational	938
Commercial	2
ENGO	3
ENGO Form Letter	2783
Other: coastal communities / local government / chamber of commerce	16
TOTAL	3768