

FORUM Recommendations and Department Responses 2015

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Issues	DFO Response
January 27-29 Forum on Conservation and Harvest Planning Meeting	
<p>1. Pacific Salmon Treaty (PST)</p> <p>It was noted that the Coho Technical Committee has started discussions/negotiations on the Coho Chapter of the PST. What other negotiations are underway that First Nations have not been informed about? While it is understood that there are some technical participants from First Nation organizations at the Pacific Salmon Commission, these people are not participating in a consultative or a decision-making role in regard to Treaty Chapter negotiations.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> a full, deep, and meaningful DFO/First Nations consultation process must be immediately designed and implemented that will properly inform the negotiations of all Chapters of the Pacific Salmon Treaty that are coming due for negotiation. Leaving the process to the internal workings of the Pacific Salmon Commission and its committees is not acceptable. 	<p>Negotiations on Chapter 5: Coho Salmon have not begun. Rather, the Parties are simply conducting reviews of what is working – and not working – under the current Treaty provisions. Similar work is underway for the remaining fishing chapters and any changes will be subject to negotiations which are expected to commence in January 2016.</p> <p>In the interim, DFO is currently conducting an internal assessment of the Annex IV fishing chapters to identify potential areas where revisions might be needed. The Department's scoping work is designed to categorize issues with the current Treaty language into the three streams of 1) housekeeping changes (i.e. minor editing); 2) implementation review (i.e. review to ensure Canada is satisfied with identified actions/allocation numbers and identify desired changes); and 3) substantive issues.</p> <p>DFO recognizes the importance of consultation and engagement with First Nations on the future of the PST and is currently developing a comprehensive consultation plan for the forthcoming negotiations. It is our understanding that the First Nations Caucus met in March 2015 to identify potential areas where revisions to the Treaty might be needed, and we look forward to receiving that information. DFO welcomes your input on both current and future Treaty implementation as well as potential approaches for information exchange and engagement to inform the development and implementation of the consultation plan.</p> <p>The consultations and negotiations on the various Chapters will be led by the DFO Panel Chairs. Should you wish to provide comments or suggestions on the PST consultations and negotiations please contact the following individuals:</p> <ul style="list-style-type: none"> ○ Chapter 1: Transboundary Rivers: Steve Gotch (steve.gotch@dfo-mpo.gc.ca) ○ Chapter 2: Northern British Columbia and Southeastern Alaska: Mel Kotyk (mel.kotyk@dfo-mpo.gc.ca) ○ Chapter 3: Chinook Salmon: Gayle Brown (gayle.brown@dfo-mpo.gc.ca), Kate Ladell

	<p>(kate.ladell@dfo-mpo.gc.ca) (Note: Chapter 3 negotiations will be led by Commissioners)</p> <ul style="list-style-type: none"> ○ Chapter 5: Coho Salmon: Arlene Tompkins (Arlene.tompkins@dfo-mpo.gc.ca), Andrew Thomson (Andrew.thomson@dfo-mpo.gc.ca) ○ Chapter 6: Southern BC and Washington State Chum: Pieter Van Will (Pieter.vanwill@dfo-mpo.gc.ca), Andrew Thomson
<p>2. Fraser River Sockeye Spawning Initiative (FRSSI)</p> <p>The Steering Committee appears to be comprised of the Canadian Caucus of the Fraser River Panel.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> the Steering Committee must be greatly expanded to include a wider range of First Nations representatives. The Steering Committee must then formulate its Terms of Reference that allow for the full participation of its First Nation members, with appropriate technical support. It is understood there have been several First Nations people identified for possible participation in this Steering Committee, but these participants have not been formally appointed at this time. 	<p>The Canadian caucus of the Fraser Panel has functioned as the Steering Committee for the FRSSI process during the past several years. At the request of First Nations and the commercial sector, additional participants have been invited to participate in the April 16 and 17 FRSSI planning meeting. First Nation participants have been identified through the Forum process and individuals have been contacted and provided details regarding the meeting. There is no formal appointment process.</p>
<p>3. CSAS Process</p> <p>While First Nations involvement in the process has improved in recent months, there are still steps to be taken to ensure that increased collaboration between DFO and First Nations is provided for?</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> actively explore with Forum attendees and the JTWG the possibility of these groups informing the Request for Information and Science Advice. Further, the JTWG and/or other suitable First Nations participants should have an official role in the development of the questions and the development of the Terms of Reference. 	<p>DFO is prepared to meet with First Nations technical advisors to have further discussion on the development of CSAS advice and opportunities for First Nations involvement in the process. Further information on the process is provided below.</p> <p>At DFO, science-based information is only part of policy formation and development of management approaches. Regardless, the high quality of science information developed through the Canadian Science Advisory Secretariat (CSAS) peer review process is invaluable in ensuring that the subsequent consultative processes with stakeholders and advisory bodies proceed from a shared and reliable information base. CSAS coordinates the peer review of scientific issues for the Department of Fisheries and Oceans. Requests for Science Information and Advice (RSIA) are submitted by lead DFO sectors (e.g. Fisheries Management) to Science to address key scientific questions; these RSIA's are informed by requests and advice from First Nations and stakeholders. RSIA's are reviewed, prioritized, and science capacity to deliver the requested advice within requested timelines is considered in developing annual science work plans. Often requests for advice exceed the capacity to deliver and not all requests are approved. For approved RSIA's, DFO science staff are assigned to complete working papers, and CSAS convenes a Steering Committee of technical experts to</p>

	<p>accomplish the following:</p> <ul style="list-style-type: none"> • Identify appropriate meeting chairs or co-chairs for the meeting (if not identified already). • Recommend meeting logistics: date and location; • Develop and recommend meeting Terms of Reference in response to the Request for advice; • Develop participants list (both internal and external, the type of expertise needed and who may have the expertise); • Identify working papers to be developed; • Develop and/or review meeting agenda; • Review working papers
<p>4. CSAS Review: Chinook</p> <p>First Nations participants at the JTWG, on behalf of the FN Forum attendees, formally request a CSAS review of chinook management measures for the Strait of Georgia, including the sport fisheries, through a Request for Information and Science Advice (RISA) to CSAS.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> respond immediately (c/o FRAFS) in support of this formal request. 	<p>DFO acknowledges the request from First Nations to review chinook management measures in Strait of Georgia sport fisheries. In considering this request, DFO will need to consider that southern BC chinook, including Fraser River chinook, are encountered in a range of First Nations, recreational and commercial fisheries in marine areas and the Fraser River and there are a range of First Nations and stakeholder perspectives on management actions in place to conserve these populations. The Department is actively pursuing the development of tools that can be used to evaluate fisheries impacts for all Canadian fisheries, including First Nations, recreational and commercial fisheries. Recent work on the Southern BC chinook planning initiative has focused on the use of these types of tools to evaluate a range of fishery management scenarios. Focusing on requests for evaluation of specific fisheries will need to carefully consider the benefits of that approach compared with work on more comprehensive tools as this will likely involve the same group of technical experts and resources are limited.</p>
<p>5. Steelhead</p> <p>Management of steelhead has long been a process of the Provincial Government and DFO each deflecting the real issues of declining stocks (e.g. Thompson) and the implementation of inappropriate fisheries that constitute a real infringement on aboriginal rights to these culturally important fish. The Province's "management/assessment model" has not passed the scrutiny of peer review. Thompson River steelhead continue to be fished and/or intercepted while at critical levels of returns. First Nations continue to be deprived of cultural and traditional fisheries.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> insist to the Province, or take it on as a federal project, that the Province's inadequate 	<p>DFO will move forward a request to Provincial staff to provide a presentation to the JTWG on their current impact model approach for Interior Fraser River, including Thompson, steelhead. This would provide an opportunity for the JTWG to discuss opportunities for further technical work.</p> <p>The province operates spawner enumeration programs for Interior Fraser River Steelhead. Spawner numbers have shown modest improvements since the 2010-2011 periods but remain well below historic levels. A 2014 review of the science and management of Thompson River Steelhead was commissioned by a tripartite (Canada – BC – First Nations) Thompson</p>

<p>model be improved to a standard that will pass peer review. First Nations – through the JTWG – must be able to review the inputs to the model.</p>	<p>Steelhead Committee providing some insight into causes of persistent poor stocks status. Barriers to achieving increases in adult spawner numbers include reduced ocean survival and fishery impacts. Juvenile production (to parr phase) appears to be subject to some form of freshwater bottleneck, with parr numbers remaining relatively static across observed ranges in spawner numbers.</p> <p>Steelhead is a species with shared jurisdiction between DFO and the province of B.C. DFO works in collaboration with the province on planning issues related to steelhead.</p> <p>First Nations have been working with DFO and provincial officials in the Thompson system on steelhead planning issues.</p>
<p>6. Qualark & Mission hydroacoustic programs</p> <p>It is thought that reduced budgets will endanger the operation of one or the other of these projects.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> convene an open and transparent assessment, with the full participation and engagement of First Nations, of the relative merits, challenges, and costs associated with these projects before any decision is made by the Pacific Salmon Commission and/or DFO regarding their continuation or cancellation. 	<p>First Nations input was sought on who they would like to participate in a sub-group of the Panel that is addressing work on the hydro-acoustics programs. Mike Staley was identified and has been invited to participate in all meetings and conference calls. This sub-group of the Panel is providing guidance on technical and analytical work to be completed. Results of this work will be brought forward to the full Panel and will inform recommendations from the Panel to the Hydro-acoustics Strategic Review Committee (subset of Commissioners), that in turn will make recommendations to the Commissioners, who will then make decisions. The purpose of this review is to develop the most efficient and cost effective hydro-acoustic program for the Fraser River.</p>
<p>7. Interior Fraser Coho management in 2014</p> <p>There are many contentious issues around the Dept.'s fisheries management decisions in 2014 that affected Interior Fraser coho. Those effects have yet to be determined but we understand that the Dept. is taking various steps to provide some answers. However, there are many questions about these steps, which appear to be taking place behind closed doors. For example, DNA samples were taken: why? Where? Who determined the locations? What was the sampling methodology? Who determined the methodology? What information is being sought, and does the sampling methodology conform to the provision of the desired information? What is the information going to be used for?</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> instruct staff to present all the information around analysis of 2014 fishery impacts on Interior Fraser coho to the JTWG, and to fully and 	<p>As part of the management approach for IFR coho in 2014, the Dep't committed to collecting info to support a post-season review. The 2014 spawner abundance (estimated at 18,500) coho was lower than expected based on the pre-season forecast abundance (range 31,000 to 78,000) and in-season exploitation rate of 10.9%. This suggested that total returns were below the lower end of the forecast range and/or fisheries impact models underestimated fisheries impacts.</p> <p>The Dep't has completed two review documents of fishery impacts in marine areas and the Fraser River to better understand factors contributing to the low spawner abundance of IFR coho in 2014. These analyses incorporated results from DNA sampling of 2014 fisheries and independent methods for assessing IFR coho mortalities in Fraser River gill net fisheries. The draft documents outline methods used to</p>

<p>completely answer questions that arise. This will include transparent sharing of technical data associated with post-season IFC analysis and the 2014 DNA project.</p>	<p>complete the analyses, including DNA sample collection and associated methodology and results. The two review documents have been provided to First Nations and stakeholders for review and have been discussed with the JTWG. These draft documents may continue to be revised based on further discussion and input from First Nations and stakeholders. Further assessment of tools to evaluate fisheries impacts are also planned for review by CSAS for marine and Fraser River fisheries in the fall. DFO is seeking First Nations participation in upcoming CSAS review and requests from DFO have been made to FRAFS and participants within the JTWG process.</p>
<p>8. Chinook: Spring 4₂, Spring 5₂, & Summer 5₂</p> <p>DFO has unilaterally moved the Outlook category from a 1 to a 2. DFO has still not explained, clearly and fully, its 2013 management regime which has continue to underpin DFO's "management measures" for these fish. First Nations technical personnel are not able to replicate the methods and results associated with the technical information contained in Rebecca Reid 2012 letter. Most First Nations in the Fraser watershed have not had their desired access to these fish for many years as a result of DFO's management measures – a clear infringement on the rights of those First Nations.</p> <p><u>Action required from DFO:</u></p> <ul style="list-style-type: none"> • First – do not deflect the issue of the Chinook Strategic Planning Initiative. This Initiative is not going to help with 2015 management of Fraser chinook. The proper management decisions must be made in 2015 that clearly provide for the aboriginal right, and the Strategic Planning Initiative is still some years away from producing an acceptable Plan. • Second – reduce the access to Fraser chinook by the commercial and sport industries starting now. • Third – design, in collaboration with First Nations, a deep and meaningful consultation process concerning chinook management decisions in 2015 before such decisions are made. 	<p>DFO provides the Salmon Outlook document in the fall of every year as an early indication of potential salmon abundance. Each outlook unit is ranked from 1 to 4 based on available qualitative and quantitative information and the opinion of DFO Stock Assessment staff. While the Salmon Outlook provides a general context for fisheries planning, discussion of specific fishery management measures is the subject of the IFMP planning process.</p> <p>The outlook category for Spring 4₂, Spring 5₂ and Summer 5₂ was improved in 2015 to a "2" or <i>low</i>, based in part on expectations for modest improvements over brood year spawner abundance. However, overall abundance is expected to remain low given ongoing unfavourable marine conditions. As a result, ongoing fishery restrictions similar to recent years are planned to remain in place for 2015 fisheries. These fishery management measures are outlined in the draft salmon IFMP and are similar to recent years in most areas.</p> <p>DFO has outlined the current management approach in numerous previous letters. This approach is intended to result in a substantial reduction of exploitation rates to rebuild chinook populations. First Nations fishing for food, social and ceremonial fisheries have priority over recreational and commercial fisheries. While reductions in First Nations fisheries are part of the current approach; commercial and recreational fisheries will have the greatest overall reductions in harvest. For commercial and recreational fisheries, impacts that remain are expected to be low and occur incidentally during fisheries for more abundant stocks and species.</p> <p>The analysis of fishery reductions in First Nations, recreational and commercial fisheries is challenging given uncertainties associated with lack of current CWT</p>

	<p>information for Spring 5₂ and Summer 5₂ chinook and reliance on a models for Fraser River and marine fisheries. However, DFO remains willing to work with JTWG to review methods and results from the available tools that are used to assess the current management approach.</p> <p>Consultation on the 2015 management plan occurred within the existing IFMP process; DFO remains open to First Nations suggestions on potential improvements to the process. In addition, DFO remains committed to working collaboratively with First Nations to develop an integrated strategic plan for SBC chinook. Both the planning process and technical working group have DFO and First Nations co-chairs to ensure First Nations perspectives are considered throughout the process.</p>
<p>9. Alaskan Sockeye</p> <p>It has become apparent that significant numbers of Fraser sockeye were caught in Alaskan fisheries in 2014.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> ascertain, before 2015 sockeye fishing plans are devised, the Fraser sockeye stocks that were intercepted by the Alaskan fishery. Further, DFO must take action through the Pacific Salmon Treaty to ensure that the Alaskan fishery is held accountable for those impacts. 	<p>During January meetings of the Fraser Panel PSC staff indicated a harvest of 500,000 Fraser sockeye in the Alaskan District 104 Purse seine fishery in 2014. This was subsequently corrected later in the week to less than 200,000 Fraser sockeye. During February Fraser Panel meetings, PSC staff provided a weekly catch table which suggests approximately 180,000 Fraser sockeye were harvested in the District 104 fishery in 2014. DNA samples are currently being processed to identify the specific Fraser stocks within that catch.</p> <p>Under current PST provisions, Alaskan harvests are not included as part of the US share. However, within Chapter 4 (Fraser) of the PST a section was added during the most recent negotiations that identify conditions under which the Alaskan harvests of Fraser sockeye would not be included in the US share; these conditions are subject to review if conditions change. This is an issue that can be raised and discussed further through the Canadian caucus of the Fraser River Panel.</p>
<p>10. Sockeye Test Fisheries</p> <p>Given the Fraser sockeye forecast for 2015, First Nations rights-based fisheries needs may not be met.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> 1. Test fisheries should not be opened on Early Stuart sockeye, and should be delayed for Early Summer Run/Summer Run sockeye. 2. While test fisheries on these later management groups are justified on a conservation and information need basis, DFO must not allow the implementation of any “business case” test fisheries without receiving the informed consent of First Nations. To do otherwise may constitute a serious infringement. 	<p>Discussions have been ongoing within the Dep’t as well as the Fraser Panel regarding the test fishery impacts on Early Stuart sockeye. Although plans have not been finalized at this time, delaying the startup of the Area 20 Whonnock and Qualark gillnet test fisheries is being considered. These are the test fisheries which have the largest impact on Early Stuart sockeye and are regularly delayed to reduce impacts. In 2011 (2015 brood year), Area 20 was delayed from June 24th to July 15th as was Qualark. This management approach continued into 2015 (see Table 7-1 on page 196 of the 2015 IFMP)</p>

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<p>11. Process Issues</p> <p>DFO staff heard loud and clear that the lack of available information/data that was necessary to fuel the discussions at this Forum was a problem. First Nations and Dept. staff agreed that meaningful input to the draft IFMP was impossible without convening another Forum, prior to the IFMP comment deadline, and that the requisite data would be supplied. Dates were set: April 10 for a JTWG meeting to first look at and discuss the information that needs to be provided by DFO; and April 13-14 for a two day Forum to properly review and inform the First Nations attendees. DFO agreed to extend the IFMP input deadline to April 17.</p>	<p>Forum meeting dates for the winter/spring of 2014-15 were set collaboratively with FRAFS and DFO in the summer of 2014. The intent was to plan in advance in order to set realistic dates when post/pre-season fisheries data would be available and also align with IFMP release/deadline. Given the challenges, discussion is taking place between FRAFS and DFO to review dates for next seasons' Forum meetings and decisions are expected in early summer. During the March Forum, DFO staff considered feedback on concerns raised and worked closely with FRAFS to plan for an additional meeting in April to address key areas of fisheries planning with new information that was available in early April. Agreement was also reached to extend the deadline for IFMP input from Forum participants to April 17th.</p> <p>2016 Forum dates were set at the FRAFS Executive Committee meeting in the summer of 2015.</p>
<p>12. Data Delivery</p> <p>DFO has still not delivered the information required for First Nations to carry out analyses related to chinook and coho management decisions/actions. DFO is aware of its consultation obligations but DFO cannot just go through the motions.</p> <ul style="list-style-type: none"> • <u>Action required from DFO:</u> DFO must provide to First Nations the information required by its own consultation processes. 	<p>DFO has undertaken considerable analysis to support discussions on the 2015 draft IFMP and has shared the relevant information on chinook and coho with First Nations and stakeholders as soon as the information was available. These analyses are complex and require substantial inputs of time and resources to provide meaningful analysis of key issues/questions that have been raised by First Nations and stakeholders.</p> <p>DFO has provided additional analysis to support :</p> <ol style="list-style-type: none"> 1) the 2014 post-season review of IFR coho impacts in a) marine fisheries and b) Fraser river gill net fisheries; & 2) analysis of an SFAB proposal to change recreational fishery regulations for Fraser chinook in the Juan de Fuca (Victoria) area.
<p>13. In-season allocation transfers</p> <p>DFO has not yet responded to the recommendation that a bilateral "in-season allocation transfer committee" be formed well in advance of the fishing season to decide on a methodology/procedure for responding to and expediting in-season proposals for transfer of allocations. This very important and sometimes-complex issue cannot be left to the whims of an isolated, unilateral ad-hoc decision making process in the middle of the fishing season.</p>	<p>DFO has provided interim guidelines in the draft 2015 IFMP which outline considerations to inform in-season allocation transfer requests (see page 237). These principles and operational considerations will be used by the Dep't when evaluating proposals for in-season transfers. Further to these, proposed updates to the Commercial Salmon Allocation Framework (see page 248) identify additional principles and guidelines identified by the FN SCC and CSAB regarding flexibilities to harvest shares.</p> <p>DFO supports a collaborative discussion to identify and</p>

	<p>resolve issues related to transfer requests and a pre-season discussion would be helpful to further discuss this issue. It may also be useful to include some commercial harvesters in this discussion for considerations related to transfer requests between commercial harvesters and First Nations.</p> <p>The Dep't initiated discussion with FRAFS in June 2015 in response to the FRAFS Forum letter dated April 16, 2015 regarding the request to develop an Allocation Transfer Committee to facilitate and expedite in-season transfers with in the Fraser. A bi-lateral, in-season allocation transfer working group, including terms of reference was in place in early summer.</p>
<p>14. Sec 35(1) fishing area change requests</p> <p>A process must be developed, perhaps with the assistance of the First Nations Fisheries Council, to deal with such requests in an open, transparent, and inclusive manner.</p>	<p>DFO is open to discuss further a potential role for the FNFC or other aggregate FN fisheries bodies in coordinating or providing feedback and advice to DFO regarding consultation on FSC access decisions.</p>
<p>15. FRSSI Performance Review</p> <p>Some of the questions that continue to be asked: This modeling process has been in use in 2006: is it still useful? Has it done what it is supposed to do? How have the outcomes influenced sockeye management? Has management been precise enough to enable evaluation of the plan? Have there been occasions when the plan was developed through FRSSI but not implemented? Why?</p>	<p>A retrospective analysis of the FRSSI model, the associated escapement plans and the models overall performance is being proposed as part of the upcoming FRSSI workshop(s). Many if not all of the questions identified in the letter will be addressed.</p>
<p>16. Chinook sport fishery</p> <p>The Dep't is considering "flexibility" particularly for the marine chinook sports fishing industry, while at the same time holding First Nations to strict management objectives even in the face of infringements. The proposed "blending" of Zones 1 and 2 – put forth by the sport fishing industry is unacceptable. As noted in the communication from the January Forum, First Nations required DFO to immediately commit to a full and transparent consultation process on the management of the Fraser River chinook.</p>	<p>The Dep't is seeking feedback on a proposal in the draft IFMP that would modify the suite of management measures in place in the Juan de Fuca and the Strait of Georgia recreational fisheries (described in Appendix 6, Section 6.3.3). The proposal seeks to align the management measures in place in these areas across management zones used to manage Fraser River Spring 5₂ and Summer 5₂ chinook. This proposed change would implement the following management actions for zone 1, 2 and zone 3 management.</p> <p>This proposed change is also identified at page 186 of the draft 15/16 Southern BC Salmon IFMP. NOTE: The dates in the draft IFMP for the Juan de Fuca area are incorrect and should read as follows (the dates in the attached memo are correct).</p> <p>Juan de Fuca recreational fishery (Subareas 19-1 to 19-4 and Subarea 20-5)</p> <ul style="list-style-type: none"> • March 1 through June 19th, the daily limit is two chinook per day which may be wild or hatchery marked between 45 and 67 cm or hatchery marked

	<p>greater than 67 cm in Subareas 19-1 to 19-4 and 20-5.</p> <ul style="list-style-type: none"> June 20th through July 31st, the daily limit is two chinook salmon per day of which only one (1) chinook may be greater than 67 cm. <p>The Dep't is looking for feedback on this proposed change and has circulated a technical memo outlining the potential implications of the proposed changes to support feedback on the draft IFMP.</p> <p>For First Nations fisheries, the Dep't is willing to continue to work with First Nations to consider flexibilities for FN fishing plans that meet the needs of FN groups while continuing to try and reduce overall fisheries impacts on these populations.</p>
<p>17. Area 20 Sockeye test fishery</p> <p>The Area 20 test fishery must not start until mid-late July. First Nations support the Whonnock and Qualark test fisheries being implemented per normal timing, as their impact on Early Stuart and the early timed stocks of the Early Summer Run management group will be minimal while still proving some basic training information important for management of window closures.</p> <p>The Pacific Salmon Commission (or DFO) must not engage in (commercial) fishing of sockeye in 2015 for the purpose of amassing funds to pay for test fisheries. The PSC has stated in the past that they implemented this practice when sockeye were very plentiful in order to obtain sufficient funds to pay for the operation of test fisheries in years of expected low returns. 2015 is such a year.</p>	<p>At its April meeting, the Fraser Panel will be reviewing start times for various test fisheries (see #9). Analysis completed by the PSC secretariat shows there would be an estimated reduction in Early Stuart mortalities (~500 fish) by delaying the onset of the Area 20 test fishery until July 13th (usual start time is June 20th). Your recommendation will inform Canada's position in panel discussions, and we expect that First Nations members of the Canadian FRP Caucus will also contribute to Caucus and Panel deliberations on this issue.</p> <p>At this point, DFO is not aware of a plan to conduct non-assessment sets on sockeye during test fisheries administered by the PSC, and that they are analyzing options to reduce test fisheries impacts on sockeye as noted above.</p>
<p>18. Sockeye (general)</p> <p>Returning four year old forecasts are inherently uncertain. Several stocks are forecast to contain a large proportion of returning five year olds – these forecasts contain a much higher level of uncertainty. First Nations state that precautionary management principles must be applied in 2015.</p> <p>The Early Stuart sockeye mortality study results have not been provided for discussion in relation to pre-season planning. This study must be provided to First Nations as part of an open and transparent data-sharing exercise that is the underpinning of a legitimate consultation process in regard to fishery management decisions.</p>	<p>The high level of uncertainty in the 2015 forecast will be taken into consideration in both the pre-season planning as well as in-season management of the fisheries directed on Fraser sockeye. In-season assessment information on run size, timing and stock composition forms the basis of management decision making as the season progresses.</p> <p>With respect to the recent UBC study on Early Stuart mortality conducted in 2014, it is premature to accept and apply the results to fisheries in 2015. The results of the study are preliminary at this time and additional discussion is needed once the study is published. Concerns have been raised in relation to the study being conducted in the Cultus lab and that it focused on effects of elevated temps on Early Stuart sockeye released from large mesh gillnets. Once the study is</p>

	completed it will be available for distribution by UBC.
19. Early Stuart sockeye Forum attendees agreed that for planning purposes the p25 forecast run size of 16,000 must be adopted, and that there will be a fishing closure to protect the 2015 Early Stuart sockeye run. They further agreed that if the MA is "normal" they would accept a maximum of incidental harvest mortality of 10% (1,600 fish), with the objective of putting at least 10,000 spawners on the spawning grounds.	The dep't appreciates the recommendations from the Forum attendees and will consider them in the finalization of the 2015 SC IFMP. The Dep't adopted the recommendation of the Forum attendees to being the year at the p25 forecast for this timing group. As in recent years, window closures and other fishing restrictions have been required in commercial, recreational and First Nations fisheries to stay within LAER objectives indicated by the escapement plan.
20. Early Summer Run stocks Forum attendees agreed in principle with the IFMP proposal to maintain an extended window closure to protect the earlier timed stocks, i.e. Taseko, Bowron, and Nadina during the period June 28 to July 29. However, attendees request that DFO provide timing info for the Early Stuart, and those Early Summer Run stocks, to support further discussion on window closures timing details at the April Forum.	The run timing information requested by Forum attendees has been provided.
21. Summer Run stocks Discussion centered on the issue of another year of strong Chilko returns along with weak returns of the co-migrating Late Stuart, Stellako, and Quesnel stocks. Further discussion will be needed at the April Forum. However, some outcomes from the March 12 discussion: <ul style="list-style-type: none">• Late Stuart must be protected. This will likely mean transfer of more TAC (Chilko) away from the mixed stock fisheries and into the Chilcotin system than would otherwise be the case.• Marine commercial mixed-stock fisheries must not be implemented in 2015 in order for First Nations to meet their constitutionally protected needs with a minimum of impact on Late Stuart in particular, but also on Stellako and Quesnel stocks.• To better inform in season management and post-season analysis, DNA sampling is used to differentiate Chilko from Quesnel stocks, and this must be continued. There should be equal effort put into separately identifying in-season the relative abundances of Stellako and Late Stuart stocks.• The two fishing plan options provided by DFO are a "winners-losers" scenario. A third potential option was briefly discussed, and may be explored in more detail in the April Forum.	The Dep't is also concerned about the low returns being forecast for Late Stuart sockeye in 2015. Fisheries directed on summer run sockeye were determined based on the final escapement plan identified in the 2015 SC IFMP. No fisheries are anticipated prior to late July in order to protect Sakinaw Lake sockeye and Fraser River Early Stuart and early-timed Early Summer Run sockeye. DNA sampling will be conducted as in previous years which permit identification of most stocks; however, differentiation between Late Stuart and Stellako is currently a challenge in-season. As discussed at the Forum meeting in March the Department is willing to discuss alternative escapement plans to the two provided in the draft IFMP.
22. Late Run stocks	The dep't appreciates the recommendations from the

<p>There seemed to be general agreement with the Lower Fraser's position of a maximum ER of 20%. However, more discussion will have to occur in April.</p>	<p>Forum attendees and will consider advice received in the finalization of the 2015 SC IFMP.</p>
<p>23. Interior Fraser Coho information package</p> <p>First nations Forum attendees note that DFO staff are/have been working on a data/information package related to 2014 post-season analysis of impacts. FN participants on the JTWG have not been provided any opportunity for involvement or input the development of the package. This is not how "collaborative management" is supposed to work.</p> <p><u>Action required from DFO:</u></p> <ul style="list-style-type: none"> ○ A draft of the IFC package must be shared with the JTWG no later than the end of the business day, Friday March 20 in order to provide some time for the JTWG to address points for clarification and consider alternative methods of analysis. ○ Clarify the 2015 draft IFC objectives, i.e. define "Canadian Fisheries" and references to pre 2014 IFC management impacts and calculations. ○ Distribute the IFC 2015 forecast as part of the package for consideration in IFC planning for 2015. ○ Include information related to IFC fisheries specific to 2011 and 2013 management (Fraser pink years). 	<p>DFO circulated draft documents that provide preliminary results of potential fishery impacts on IFR coho in 2014. In addition, a discussion document (<i>Draft Discussion Paper: 2015 Interior Fraser River Coho Management</i>) outlines planning considerations for 2015.</p> <p>DFO has also developed a discussion document to guide feedback on the 2015 fishing plan. This includes the 2015 forecast for IFR coho and some fishery scenarios related to the 2011 and 2013 fisheries.</p> <p>With respect to 2015 fisheries planning, DFO is seeking your feedback as follows:</p> <p>Within the 10% ER limit for Canadian fisheries (occurring South of Cape Caution), what are the key fisheries management considerations that need to be taken into account? What configuration of fisheries would you support?</p> <p>The views received during consultations will inform final decisions on the 2015 fishing season to be included in the Southern BC IFMP. Further information is also provided at point #7 above.</p>
<p>24. Fraser Chinook</p> <p>As noted very strongly by FN Forum attendees in January, DFO continues to manage Fraser chinook largely for the benefit of the marine sport industry and a comprehensive management consultation process must be implemented. Before considering any changes to the marine sport fishery in the 2015 IFMP, DFO must:</p> <ul style="list-style-type: none"> • Assess and peer review the existing management measures and evaluate the existing fishery regime with respect to conservation objectives and exploitation rate assumptions; • Distribute and describe the data/inputs/information/tools associated with the 2015 marine sport fishery and provide an evaluation of the implications to First Nations rights-based fisheries; • The 2015 salmon outlook for spring 4₂ Fraser chinook went from 1 to 2. DFO must describe any subsequent changes to the approach for the 2015 fisheries (compare with 2014 etc. when the outlook was 1), and describe the distribution of impacts and conservation objectives, including methods and calculations. The draft IFMP management objective appears to be 	<p>DFO agrees that further assessment of existing management measures with respect to conservation objectives and exploitation rate assumptions would be useful for all fisheries. The Chinook Technical Committee of the PST process has been working on a model that may be useful for contributing to this analysis; further work is planned in conjunction with the SBC chinook planning process technical working group (see #4).</p> <p>Information and analysis on the 2015 marine sport fishery is provided for the proposed changes in the Juan de Fuca and Strait of Georgia (see #16).</p> <p>Information on the salmon outlook, proposed 2015 management approach and review of 2012 analysis is provided in #8.</p>

<p>unchanged from the previous year (outlook 1) – but it is written such that changes to impacts to these stocks by sport fisheries may be allowed while still “meeting the objective”. The potential for further infringements on First Nations rights to these stocks may be increased. Clarification is required.</p> <ul style="list-style-type: none"> As noted over the last two years, FN technical personnel are not able to replicate the methods, results, and consultation associated with the management information provided in the 2012 Rebecca Reid letter. To date, DFO has not responded to requests for detailed discussion with DFO technical staff responsible for the information in that letter that outlines the spring/summer 5₂ impacts and reductions. Furthermore, First Nations also request a full discussion regarding an evaluation of the objectives outlined in the 2012 letter based on independent data. Complete transparency is expected in regard to all sectors. 	
<p>25. Fraser Pink salmon</p> <p>More information is required to meaningfully discuss proposed Fraser Pink salmon fisheries with First Nations:</p> <ul style="list-style-type: none"> Potential constraints on pink salmon fisheries from protected steelhead, Late run sockeye, and Interior Fraser coho; The proposed increases to pink salmon allocation and opportunities for sport fisheries as outlined in the draft IFMP; Catch monitoring plans (including encounter rates and by-catch of other species) for pink salmon sport fisheries. 	<p>Further discussion on pink salmon fisheries planning will occur at the next Forum meeting on April 13. Please refer to recommendation #32 below for more detail regarding Fraser Pink salmon.</p>

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<p>26. Early Stuart Sockeye</p> <p>All attendees expressed concern about conserving the Early Stuart run and agreed that DFO should start the management season at the pre-season forecast p25 level. There was also agreement that if there were strong indications in-season that the p50 level was going to be surpassed, that flexibility was needed in order to allow for the possibility of a lower river dry-rack fishery and directed fisheries in the upper Fraser. Lower and up-river attendees agreed that in-season dialogue between the two areas would have to take place if it looked like such a fishery was being contemplated. Attendees agreed that it will be important to have some timing information available in-season, hence the Whonnock/Cottonwood test fisheries and the Qualark calibration fishery were supported. Finally, the proposed window closure outlined in the draft IFMP was also fully supported.</p>	<p>The escapement plan for Fraser sockeye will not be available until the final 2015/2016 IFMP is released.</p> <p>Fraser River sockeye are managed on the basis of the four management groups (Early Stuart Run, Early Summer Run, Summer Run, and Late Run).</p> <p>For Early Stuart sockeye in all proposed escapement plans, the return has a very high probability of being less than the lower fishery reference point (108,000). However, the escapement plan does provide for some limited incidental harvests (i.e. 10% Low Abundance Exploitation Rate or LAER) in situations when there is zero or very low total allowable mortality. The intent of the LAER is to allow for limited fisheries directed on co-migrating stocks or species but may also permit limited harvest in some cases. Attachment B provides an example of these incidental impacts at the p25 or p50 forecast returns.</p>
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	<p>With respect to test fisheries, the commencement of the Area 20 gillnet will be delayed by approximately 3 weeks until July 13, yielding a projected reduction in Early Stuart impacts of approximately 500 fish. For details on projected test fishing impacts on Early Stuart sockeye, direction to slide 33 of Attachment C was given. The test fisheries at Whonnock and Qualark are projected to proceed on June 22 and June 29, respectively.</p> <p>Update since the dissemination of this response letter: The IFMP was adjusted such that the Qualark test fishery was to commence on July 16.</p> <p>With respect to the recommendation to begin the management season at the p25 forecast level; as you are aware, for Fraser Sockeye and Pink salmon, Canada is responsible for providing both the pre-season forecast of run size as well as the escapement target. Standard practice of the Fraser Panel has been to start management at the p50 forecast level until there is sufficient assessment info to adopt in-season run-size estimates. Based on pre-season forecast and long term median management adjustments, Early Stuart sockeye remain in a low abundance exploitation rate (LAER) situation if actual returns fall between the p10 to p90 forecasted return levels of the escapement plan. The Fraser Panel has agreed to use the p25 run size forecast level for Early Stuart sockeye to begin the season.</p> <p>There will be further discussion of your recommendation at the upcoming Canadian Caucus and Fraser Panel meetings in Suquamish, Washington in June. Please be aware that with delays in the onset of test fishing in Area 20, confirmation of actual in-season run sizes may be delayed for the Early Stuart run, thereby limiting flexibilities for First Nations' fisheries.</p> <p>You have suggested that in-season dialogue between First Nations in the Lower Fraser and the BC Interior should occur if Early Stuart-targeted fisheries were to be contemplated in either area. We would appreciate your views on the format and process for coordinating these discussions.</p>
<p>27. Early Summer Run Sockeye</p> <p>All attendees agreed that the proposed extension of the Early Stuart window closure as outlined in the draft IFMP was necessary to provide at least some protection to the early timed Early Summer Run stocks. It was also noted that this would also help protect the "tail end" of the Early Stuart run.</p>	<p>The proposed four week window closure identified in the draft IFMP (3 weeks for Early Stuart plus 1 week for early timed Early Summer run sockeye) will be implemented. A copy of the window closure dates was provided in an attachment.</p>

<p>If assessment fisheries indicate a significant deviation (earlier or later) in expected timing for Early Stuart sockeye, adjustment to the window closure should be made.</p>	
<p>28. Summer Run Sockeye</p> <p>Management of the Summer Run aggregate in 2015 in order to meet the priorities of both conservation and First Nations needs is going to be a challenge. This was a long discussion that included the following points:</p> <ul style="list-style-type: none"> • Secwepemc do not support the 65% TAM rule with the Lower Fraser Reference Point (LFRP) of approximately 500,000; a LFRP of 1 million is required for this year given the uncertainties re contribution of 5 year old fish to the forecast returns, and potential impacts to the (co-migrating) Shuswap Early Summer Run stocks. • Lower river attendees are uncertain re management of their fisheries in 2015, given the experience in 2014 where “proportional sharing” kept them out of the water while an abundance of fish (while other fisheries proceeded) were evident. • Late Stuart Sockeye: It was noted that 60% TAM and 65% TAM were not the critical parameters re concerns for meeting Late Stuart conservation needs – it is the LFRP that will determine of the priorities of conservation and First Nations’ needs can be properly considered. All agreed that the best chance of addressing these priorities is to set the LFRP at 1 million based on the p50 forecast. This is being put forward as an “Option 3” – 65% TAM with a LFRP of 1,000,000 at the 50p pre-season forecast. • If any commercial TAC materializes for the Summer Run aggregate, move it off the mainstem and into the Harrison and Chilcotin systems. • It is extremely important for work to continue on developing the means to separately identify Stellako from Late Stuart sockeye in-season in mixed stock assessment and fishery areas (analogous to the treatment of Chilko and Quesnel). Without that ability the two stocks must be treated as a sub-aggregate; management decisions must reflect the pre-season forecast of relative abundance of those two stocks in the interests of protecting the smaller of the two stocks for conservation and Sec 35(1) needs. If Late Stuarts are assessed in-season at less than the p50 forecast, attendees recommended that DFO default to the 60% Option 1 TAM rule for the Summer Run aggregate. <p>The issues and interests surrounding management of the Summer Run aggregate are complex, given the high probability of serious conservation concerns for at least 2 of the upper river stocks. Individual First Nations and groups will provide DFO with their feedback, likely taking into</p>	<p>A key consideration in the escapement plan options for 2015 was the management of the Summer run. The draft IFMP identified two management options for consideration. Based on advice from the Forum participants, the Department is also considering an additional option (“Option 3”) that considers a modified approach that includes a lower fishery reference point of 1 million for the Summer run with consideration of a higher TAM cap of 65% at higher returns. Option 3 with a TAM cap of 65% was chosen (see Table 7-14 on page 95 of the IFMP).</p> <p>Although the escapement plan is developed for the management aggregates, the abundance based harvest rules are intended to provide protection for conservation units within the aggregates by reducing total allowable mortalities as run size declines. A final decision on the escapement plan will be outlined in the 2015/2016 IFMP. Please refer to Table 7-14 on page 95 of the IFMP for the Escapement plan for Fraser sockeye in 2015.</p>

<p>consideration much of the agreed-to concerns expressed at the meeting. But there was a general theme of agreement: DFO's final management decision must clearly demonstrate that they are meeting the two priorities – conservation on a stock-specific basis, and the priority of First Nations needs over that of the commercial/sport sectors.</p>	
<p>29. Late Run Sockeye Time did not permit detailed discussion. The principle of managing to a LAER of maximum 20% was agreed to.</p>	<p>For Late run sockeye, all the options under consideration would permit a LAER of 20% for all returns at p50 or less with consideration of an up to 30% LAER at high returns (i.e. p75 level). The escapement plan could allow for a higher exploitation rate in the event returns are higher than expected and/or management adjustments are lower than expected (i.e. if Late runs delay in the Strait of Georgia).</p> <p>With respect to Cultus sockeye, management objectives and approach for 2015 are proposed to remain the same as in recent years. The existing approach is intended to meet recovery objectives and provide for opportunities to rebuild this population over time. As in previous years, the general management approach would allow an exploitation rate that is greater of a) the low abundance exploitation rate identified for late Run Sockeye, or b) the exploitation rate that is consistent with continued rebuilding of the population based on in-season info on returns and potential numbers of effective spawners (directed to slide 18 in attachment C).</p>
<p>30. Chinook There was consensus agreement on the following: The SFAB proposal to change management measures that would allow for an increase in ER while in Zone 1 management must be rejected.</p> <p>Attendees noted the following reasons for their consensus position:</p> <ul style="list-style-type: none"> • Many First Nations' rights to fish that return to their areas are being infringed as sufficient numbers to support both a harvest and an adequate spawning escapement are not allowed to return. • DFO cannot adequately assess the effects of current management practices in marine waters; to introduce new changes will confound the ability to evaluate results of those changes. This will detrimentally affect the deliberations of the CSPI initiative. • While the CSPI initiative is underway and making progress there should not be contemplation of any new fishery proposals other than closures in the marine sport and commercial industries. • First Nations' rights as expressed in the Sparrow 	<p>The Dep't is planning to continue managing Fraser Spring 5₂ and Summer 5₂ chinook by starting the season with zone 1 (less than 45 thousand return to the mouth of the Fraser) management actions. The approach of starting the fishing season in Zone 1 is expected to continue for the foreseeable future until brood year escapements and/or the recruitment rates substantially improve. Consistent with previous years, the Dep't plans to update expected returns (to the mouth of the Fraser) using in-season data from the Albion test fishery. An adjustment may be made to the management zone based on the estimated in-season abundance on or before mid-June depending on the strength of returns.</p> <p>The draft IFMP identified a proposal that would modify the suite of management measures in place in the Juan de Fuca and the Strait of Georgia recreational fisheries in Section 6.1.1 in Appendix 6. The proposed approach would implement the same set of management actions for low, moderate or abundant returns (i.e. zone 1 to 3) used to manage Fraser River Spring 5₂ and Summer 5₂ chinook. DFO has provided an analysis of the potential</p>

<p>decision are being infringed, and the SFAB proposal is a bid to exacerbate that infringement. First Nations are bearing the brunt of conservation and DFO is advised to take this issue seriously and adjust its chinook management practices accordingly:</p> <ul style="list-style-type: none"> • The sport fishing industry maintains its objective is to provide opportunity and expectations. Regarding opportunity, it is measured by the number of days/months/complete year that the opportunity exists for the sports industry as opposed to the relatively few days and hours that exist for the aboriginal rights-based fishery. Regarding expectations, as long as there is a bag limit associated with a sports fishery the expectation is not diminished. For the aboriginal fishery, the expectation is diminished by the lack of opportunity and the effects of other fisheries on their rights. By these measures it is very obvious that it is not the sports fishery that is bearing the brunt of conservation. 	<p>implications of the proposed changes on conservation of Fraser Spring 5₂ and Summer 5₂ chinook populations. DFO understands that First Nations Forum attendees do not support this proposed change. A final decision on this proposal will be outlined in the 2015/2016 IFMP.</p> <p>An annual review of fishery management actions and results for Fraser chinook will continue to be conducted as part of the annual post season review meetings. In addition, work is on-going to develop an integrated strategic plan for all Southern BC Chinook and work over the coming year is expected to provide further analysis to support discussion on management actions that could be considered for fisheries, but also for other potential actions related to enhancement, habitat and research activities. Results from this process are intended to inform a draft Integrated Strategic plan that is intended to be completed by March 2016.</p>
<p>31. Coho</p> <p>There was consensus agreement on the following: DFO's proposal to allow an ER on IFC of up to 10% is rejected. Attendees note the following:</p> <ul style="list-style-type: none"> • When putting forward the management options for 2014, DFO repeatedly stated that they were deviating from the practice of managing at a 3% ER in Canada for 2014 only. • DFO's failure to meet spawner escapement objectives for 2014 (incorrect 2014 pre-season forecast combined with higher than expected levels of mortality from other fisheries) should provide DFO with reason enough to revert to pre-2014 management practices. • DFO domestic management is inconsistent with their Pacific Salmon Treaty obligations. This must be rectified. • DFO must reinstate the conservation measures that were in place prior to 2014, to meet the objective of a 40,000 coho return above Hells Gate to provide for the objective of having 1,000 or more spawners per natal stream. • The anticipated pink salmon sport fishery (marine and fresh water) must be monitored and independently assessed for coho by-catch (independent observers), and impacts determined and provided in a post-season review. 	<p>In the draft 2015 IFMP, the objective for IFR coho (including Thompson River coho) is to manage Canadian fisheries to an exploitation rate of 10% or less. The Dep't intends to continue to manage Canadian fisheries to minimize impacts on Interior Fraser coho populations consistent with the management objective. Specifically, the exploitation rate limit for IFR coho in Canadian fisheries is intended to provide limited incidental impacts while fishing for other stocks or species where Interior Fraser River (IFR) coho may be encountered. Incidental and/or by-catch mortalities are used to provide access to southern BC fisheries where IFR coho may be encountered within available exploitation rate limits.</p> <p>In terms of PST obligations, Canada has informed the United States that our intention is to manage Canadian fisheries consistent with a <i>low</i> status for IFC management unit under the PST. This approach entitles the United States to an exploitation rate limit of 10%; Canada would also be entitled to an up to 10% exploitation rate. However, Canada also has the flexibility to manage to a lower exploitation rate for domestic reasons. You state that DFO domestic management is inconsistent with Canada's Pacific Salmon Treaty obligations. While there are differences in the nature of the models used to assess Canadian IFR coho impacts domestically and through the international process, Canada has consistently remained within PST exploitation rate caps laid out for both Canadian and US management groups as assessed annually by the bilateral coho technical committee.</p>

	<p>Achievement of PST obligations with respect to coho exploitation rates will be an important consideration in 2015 fisheries management.</p> <p>As part of consultations on the draft IFMP, discussions focused on how much caution should be exercised in planning fisheries given key uncertainties about potential coho returns, fisheries impacts on IFR coho, and managing to Canada's international obligations to manage domestic fisheries at an ER of 10% or less. The Dep't acknowledges the consensus from the Forum that managing up to a 10% exploitation rate is not acceptable to First Nations; further, First Nations indicated a preference to manage Canadian fisheries to a lower exploitation rate similar to measures in place prior to 2014. However, the Dep't has also received requests from some First Nations for opportunities to retain coho salmon as by-catch in fisheries directed at more abundance species or limited directed harvests in terminal areas. Specific fisheries management measures for 2015 are being considered based on input from First Nations and stakeholders. A final decision on the key management considerations for IFR coho will be outlined in the 2015/2016 IFMP.</p> <p>Similar to 2014, there are plans to collect and analyze coho DNA samples to support a post-season review and assessment of fishery impacts on IFR coho. This will include information from fishery monitoring and catch report programs in place to assess southern BC fisheries. Catch monitoring programs for First Nations, commercial and recreational fisheries, including creel programs in marine areas and the Fraser River, are planned similar to recent years; however, annual program adjustments are made based on expected fisheries and funding available.</p>
<p>32. Pink</p> <p>A consensus concern was expressed that the in-river sport fishery for pink salmon must meet the assessment requirements from First Nations (see coho point above). Contrary to DFO's assertion, pink salmon sport fisheries employ methods and gear that do catch coho. Further, the sport fishery regulations provide for a 2 fish per day limit which can be increased to 4 if abundance allows. DFO's intentions to provide a 4 fish per day limit must therefore be matched by providing First Nations with a significant increase to their allocation as compared to 2013.</p>	<p>The 2015 forecast for Fraser Pink is 14.455M (range of 7.66M at p10 to 27.78M at p90). The escapement target for Fraser pink salmon is approx. 6 million, but increases for larger returns. Based on pre-season info, FN, rec. and commercial fishing opportunities are anticipated. In-season test fishery information will inform actual fishing plans. Opportunities to harvest pink salmon will likely be constrained by objectives for stocks of concern, including Cultus/Late run sockeye escapement objectives and IFC salmon.</p> <p>The draft IFMP proposes starting the Fraser River rec. fishery with a daily limit of four pink salmon. Given the abundance of pink salmon, the recreational fishery has opened with a daily limit of 4 per day on the past 4</p>

	<p>cycles consistent with the allocation policy. In terms of concerns about impacts on IFC, the Dep't has accounted for potential impacts in pre-season planning models and there are plans for a recreational creel survey in the Fraser River to assist with post-season impact assessments. The daily limit of four Fraser pink salmon persisted throughout the opening.</p> <p>Your letter also indicates concerns with the allocation of pink salmon provided to First Nations. The expected pink salmon abundance should provide for opportunities for First Nations to harvest for FSC purposes. In addition, the Dep't also provides access to Fraser pink salmon for commercial purposes through economic opportunity and demonstration fishery arrangements; commercial access is provided as a percentage share of the commercial total allowable catch and, as a result, the commercial harvest (in pieces) is larger for higher pink salmon returns. Refer to Table 5-1 of the IFMP, Communal Licence Harvest Target Amounts outlines the harvest targets for pink salmon by area. In comparing the harvest targets with that of the 2014 IFMP, there was an increase of 200 pieces for the Lower Area First Nations.</p>
<p>33. Allocation Transfer Committee</p> <p>It was noted that time is passing without action being taken on the First Nation recommendation (September 29, 2014) to the RDG that a First Nation/DFO committee be formed in order to facilitate and expedite in-season transfer of allocations within the Fraser when opportunities are presented. This should be a bi-lateral, truly collaborative effort. A small team (First Nations and DFO) should be assembled to develop the Terms of Reference, which would include membership (both DFO and First Nations), purpose, decision-making procedures, etc.</p>	<p>DFO provided interim guidelines in the draft 2015 IFMP which outline considerations to inform in-season commercial allocation transfer requests (see page 237-draft IFMP). These principles and operational considerations will be used by the Dep't when evaluating proposals for in-season transfers of commercial allocation between groups with commercial harvest shares. DFO supports collaborative discussion to identify and resolve issues related to transfer requests and agrees that a meeting to discuss this issue should be arranged before the season. DFO has now followed-up with the FRAFS staff and executive and work is underway to initiate discussions on this area as per your recommendation.</p>