

Comments received by the Department on IFMP Draft #1

Note: This table is intended to highlight areas where there are potential inter-sectoral issues to facilitate discussion at the IHPC meeting. 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.

Issues:	DFO Response
General comments/wording suggestions	
1. All edits incorporated are in tracked changes	
RHQ	
2. Sec 3 - Social, Cultural and Economic Importance: Concerns raised by First Nations, Sport Fishing Advisory Board, Marine Conservation Caucus and Commercial Harvesters (Area F/IHPC) with: a. content (comparing economics of very diverse fisheries using different sources/types of data. b. Sources of information used for the report.	<p>Suggestions which were included:</p> <p>1) Addition of text to introductory paragraph (p.30): specifying that the sections aren't meant to be directly compared; numbers presented reflect the specific economics of each fishery and have different interpretations in the context of the broader provincial and national economy. (DFO recognizes the unique values of each of the fisheries described here. The overview provided in this profile is intended to help build a common understanding of the socio-economic dimensions of each fishery rather than compare the fisheries.)</p> <p>2) Moved the First Nations commercial fisheries description to the commercial section as suggested.</p> <p>Suggested changes which were not included:</p> <p>a. Request for additional detail around the social & cultural values of healthy and diverse salmon populations</p> <p>a. Information provide in section 3 follows a National Template with a focus on the <i>fisheries</i> – clearly there are non-fishery values for salmon, however, including them</p>

Comments received by the Department on IFMP Draft #1

	<p>represents a shift in the focus of the IFMPs based on the National template and will require a broader review.</p> <p>b. Suggestions re: additional sources</p> <ul style="list-style-type: none">a. Regarding the BC 4 Sector Report: at the time of writing the first draft of the IFMP that report had not been released, which is why it is not included in this year's version.b. Including the public opinion polls suggested by MCC at requires additional discussion as this is not part of the agreed upon NHQ format. Consideration for including economic value of tourism related to viewing spawning salmon will be made for the next IFMP based on information available at that time.
3. Sec 4: Wild Salmon Policy: Concerns raised by First Nations and MCC regarding level of detail outlining progress made in implementing WSP. Questions/concerns related to resources provided to implement WSP, lack of detail on specific commitments and achievements, need for reform based on watershed management approach.	3. The WSP continues to guide the Department's approach to salmon conservation and there is ongoing work on the implementation strategies. Updates on this work will continue to be provided as work progresses. Information on the DFO website outlines achievements but additional updates are required to fully reflect recent work.
4. Transfers: Requests from First Nations and commercial harvesters for additional clarity on guidelines related to transferring of commercial harvest shares.	4. See NEW sections: p. 125 in Northern IFMP and p.191 in Southern IFMP for interim operational guidelines for the temporary commercial salmon share transfers in 2013.
5. Interior Fraser River Coho: requests received from SFAB, Area G, Commercial requests for maximizing pink salmon harvest, First Nations for additional opportunities in 2013 to access more abundant stocks and species. Requests for clarity on management	5. DFO has proposed a small increase from 3% to 4% for the IFR coho management objective for 2013; details are included in the draft Southern IFMP for consideration. See section 5.1.5 (p.58). Pending completion of a more detailed analysis, the Department is seeking feedback on a potential adjustment

Comments received by the Department on IFMP Draft #1

<p>approach.</p> <ol style="list-style-type: none"> 1. LFFA: more detail on allocation of IFC impacts and full review required. 2. Q'ul'hanumutsun Aquatic Resources Society do not support SFAB request for increased retention in Areas 20-1 3. Secwepemc Fisheries Commission – agrees with conservation measures outlined in IFMP regarding IFC to limit ER to less than 3%. 	<p>to the IFR coho objectives as described in the 2nd draft SC IFMP.</p> <p>As outlined in the IFMP, the exploitation rate limit for IFR coho in Canadian fisheries is used to provide incidental impacts while fishing for other stocks or species where Interior Fraser River (IFR) coho may be encountered and released. Incidental mortalities are used to provide access to all southern BC fisheries where IFR coho may be encountered.</p>
<p>6. Fraser River Sockeye:</p> <p>General support for Option 2 escapement option (CSTC, LFFA, MCC, and LTN) however concerns raised with management of individual stocks including within the four aggregate management groups.</p> <ol style="list-style-type: none"> a. LFFA: Options not flexible enough and late run exploitation should be set for 20%. Birkenhead stock harvest should not impact management of fisheries upstream b. LFFA - First Nations who have an interest in Chilliwack Sockeye would like to conduct research and experimental fisheries to further explore efficient harvesting for future opportunities. c. MCC: insufficient protection of Bowron sockeye at range of potential run-sizes. ERs for Lates at higher run sizes constrain rebuilding of Cultus and should be lowered. d. CSTC (Carrier Sekani Tribal Council) BCI: concerns with managing Summers as a single management unit (comprised on diverse group of sockeye stocks/CU's) and potential impacts to 	<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). Pre-season forecasts of run size at various probability levels are developed for major sockeye stocks within the four management groups. The two escapement plans options in the IFMP outline fishery reference points for each of the four management aggregates and are based on outcomes from the Fraser River sockeye spawning initiative process. Although the escapement plan is developed for the management aggregates, these plans include considerations for conservation units within the aggregate; additional constraints have also been identified for stocks of concern. Decision rules for management aggregates have been tested using the FRSSI model for expected performance at maintaining stocks (CU's) above lower abundance benchmarks over time. For 2013, the Department also provided information on the potential outcomes for stocks (with CU's identified) for each of the escapement plan options at a range of run sizes relative to a variety of benchmarks that have been identified for assessing status. In addition, the Department is developing a document that outlines the current Fraser River sockeye management approach and expects further discussions to include a process for dealing with proposed changes to that approach.</p>

Comments received by the Department on IFMP Draft #1

<p>Nechako FSC fisheries. Recommend more precautionary option for Summer stocks and break into 2 management units.</p> <p>e. Lheidli T'enneh (LTN) – Support option 2 sockeye escapement plan but concerned with direct harvests on Early Summer's (Bowron) and Summer's (Late Stuart and Stellako) at p50 forecast with either option 1 or 2. Option 2 decreases ER at smaller run size but will have impacts.</p> <p>f. SFC (Secwepemc Fisheries Commission): Early Stuart / Early Summer –SFC supports three week rolling window closure for Early Stuarts, plus additionally one week closure for Early Summer. SFC supports these closures even if TAC is identified to mitigate for enroute mortality due to unfavorable migration conditions. Late summers: Recommends DFO should begin season with assumption of no delay, pre season planning should not change until in-season information is available to confirm delay. If no signs of delay, MA needs to increase and harvest rates decrease. At forecast returns of less than p50, lower abundance ER should be 10% rather than 20%. If in season info indicates no delay (even at p50), 10% ER should be maintained. SFC recommends and supports DFO adopt sockeye escapement option 2.</p>	
6. Chinook: First Nations and comments at the IHPC requesting additional detail on the rationale for changing the breakpoints.	6. Please see section 5.1.4 (p. 57) for details and rationale. Detailed information is also available.

Comments received by the Department on IFMP Draft #1

<p>7. Chinook:</p> <ul style="list-style-type: none"> a. LFFA: concerns with Spring 4₂ populations. Reduce impact in other fisheries to ensure FSC needs met. b. MCC: concerns that spring/summer 5₂ and spring 4₂ should be a zero fishing mortality goal. Recommend increasing breakpoints between management zones for spring and summer 5₂ chinook. Zone 1 allowable harvest for spring 4₂ and summer 5₂ still too high (ER should be reduced by ½) c. SFC – concerned with Spring 4-2, Spring 5-2 and Summer 5-2. Recommends DFO manage fisheries to stay below a max. of 10% ER on Spring 4-2. SFC agrees in principle with increase in management zone breakpoints for spring and summer 5-2, however request post season analysis of breakpoints to determine what extent new break points actually aided in rebuilding / conservation of these stocks 	<p>There has been extensive work over the last several years to develop a management approach for Fraser River Spring 4₂, Spring 5₂ and Summer 5₂ chinook. The objectives and management actions are identified in the IFMP. The Department's approach continues to be based on ensuring conservation of chinook populations. After conservation, DFO is committed to priority of First Nations harvest opportunities for FSC purposes over all other uses in managing salmon fisheries. This approach seeks to substantially reduce fishery impacts while avoiding broad fishery closures that would result from a zero fishing mortality approach. An annual review of fishery management actions and results for Fraser chinook will continue conducted as part of the annual post-season review meetings.</p> <p>In addition, work is on-going to develop an integrated strategic plan for all Southern BC Chinook and results from this process may help inform adjustments to management actions in subsequent years.</p>
<p>8. Demonstration Fishery Proposals</p>	<p>8. Proposals being considered are included in the draft IFMP. Area Harvest Committees have been informed about demonstration fishery proposals which have not been included and won't be considered for 2013. Interim guidelines on demonstration fishery proposals which include transferring of shares are provided in the revised draft of the IFMP for clarity (see above). Key information re: demonstration proposals for 2013 are included under the specific region of request.</p>
<p>9. MSC certification conditions: MCC request content re: MSC conditions and status be included in the IFMP</p>	<p>9. The Department is supports third party eco-certification processes as the fishery regulator and some of the information that supports the annual Audit process is included in the salmon IFMP's. However,</p>

Comments received by the Department on IFMP Draft #1

	<p>the IFMP is not the only source of this information and other documents are also used to support resolving MSC conditions. The IFMP is not the primary mechanism for reporting on MSC conditions and an annual audit document that tracks the status of MSC conditions is provided by the certification body for this purpose.</p>
South Coast	
10. Sec 7 – WCVI Chum: Area B want inclusion of potential opportunities if abundance permits for Areas 23-27) and potential opportunities in Area 28	10. WCVI chum abundance has remained low in recent years and expectations are poor for 2013. For 2013, potential opportunities will be focused on limited effort gill net fisheries if abundance permits.
11. Chinook: <ul style="list-style-type: none"> a) SFAB request for retention of hatchery marked Chinook on WCVI. b) Management measures required to respond to low forecast return of Barkley Chinook 	11. Response: <ul style="list-style-type: none"> a. Request was not approved; response letter provided. b. Proposal developed by Area 23 Harvest Committee to limit terminal access and restrict recreational retention in Barkley Sound to 2 chinook per day less than 77 cm to protect large female spawners..
12. Access to Area 16 (Sabine) for Area B and E for Fraser river sockeye, pink and chum	12. Potential impacts on stocks of concern are under review (Sakinaw Lake sockeye, local coho and chinook stocks)
13. Demonstration Fishery Proposals (new for 2013): <ul style="list-style-type: none"> a. Area B: Chum Hybrid fishery in JST; one competitive opening followed by ~3wks of ITQ fishing. b. Area B: Fraser River Area 29 terminal chum fisheries in-river and off the river mouth when FR TAC available. c. Area D: expand fishing area into Port Hardy Airport area (12-9). d. Area D: Area 14 limited participation sockeye fishery. 	13. Response letters to AHCs are currently being drafted (for ~May 1). <ul style="list-style-type: none"> a) Fish Mgmt working with Stock Assessment to determine feasibility. b) Fish Mgmt working with Stock Assessment, will depend on in-season TAC availability and constraints around species of concern. c) Not approved for 2013 due to concerns around bycatch. Possible in future with on-board observers. d) Fisheries Mgmt working with Stock Assessment to determine feasibility given timing and stocks of concern. e) Unlikely for 2013 as limited support by harvest committee.

Comments received by the Department on IFMP Draft #1

<p>e. Area D/E: JST (Area D) and Area 29 (Area E) small bite pooled sockeye fishery when low TAC</p> <p>f. Area D/E: Pink transferable shares.</p> <p>g. Area H: Area H/FN EO transferable shares fishery for sockeye and pinks.</p>	<p>f) Not approved for 2013 as proposal was not supported by harvest committees. Will work with AHCs to plan for next Fraser pink salmon return in 2015 season.</p> <p>g) Demonstration fishery proposal is included in the Southern IFMP. Transfers will be considered based on Interim Guidelines for Temporary Commercial Share Transfers. .</p>
<p>14. WCVI Chinook</p>	<p>14. Robertson Creek: A poor forecast will likely preclude seine or gill net fisheries for Somass (Robertson Creek) chinook in 2013 (update provided on page 185 of the SC IFMP).</p>
<p>15. SCC concern over Area G troll management practices and overexploitation of weak Fraser Chinook stocks)</p>	<p>15. Management measures to minimize impacts on Fraser Spring 4-2, Spring 5-2 and Summer 5-2 chinook have been established to substantially reduce the impact on these populations consistent with Allocation priorities. Measures for Spring 4-2 chinook include a time-area closure from March 16 to April 18 and boat day effort limits. Measures for Spring 5-2 and Summer 5-2 include a time-area closure in June 16 (or earlier for zone 1 management) and late July. Specific measures are outlined in the southern IFMP (Appendix 7, Section 7.17)</p>
<p>Lower Fraser Area</p>	
<p>16. LFFA request Economic Opportunity (EO) fisheries for chum following the coho closure and inclusion of a gillnet fishery similar to opening times of Area E fishers in the river.</p>	<p>17. The issue of using gill nets to harvest chum will be discussed by the Department with First Nations. All fisheries in Canada are managed to the exploitation rate limit for Interior Fraser coho and measures to conserve Interior Fraser steelhead are in place. Provision of gill net opportunities may increase potential impacts on stocks of concern (i.e. due to higher 60% release mortality rates assigned to gill nets) and could limit the availability of additional opportunities using beach seine or other more selective gear.</p>
<p>BC Interior</p>	
<p>17. Appendix 5 and 6 – Coho Closure Dates don't match and Kamloops Lake is excluded</p>	<p>18. Appendix 5, corrected date for upstream of Lillooet and changed definitions for Thompson River to include Kamloops Lake.</p>
<p>18. Secwepemc Fisheries Commission: request for</p>	<p>19. Proposed dates are included in the second draft of the IFMP.</p>

Comments received by the Department on IFMP Draft #1

adjustments to the coho window closure dates for the Thompson River in the IFMP to align with other areas on the Fraser main stem	Additional analysis required on impacts on IFR coho. Appendix 5, Section 5.2.3.
19. Demonstration Proposals a. Both UFFCA and SFC submitted Demo shares transfer proposals specific to Fraser Pinks	a) Proposals being considered are included in the draft IFMP under BCI Demo's. Interim guidelines on demonstration fishery proposals which include transferring of shares are provided in the revised draft of the IFMP for clarity (see above). Key information re: demonstration proposals for 2013 are included under the specific region of request.
North Coast	
20. Chinook (WCVI): concerns raised by commercial harvesters and the Marine Conservation Caucus with how WCVI mortalities will be accounted for in the Area F troll fishery	22. A presentation on alternative management options will be provided at the May 1-2 IHPC meeting.