

Summary of Feedback Received by DFO in consideration for the 2019/2020 Southern BC Salmon IFMP
January 17th 2019

Note: This table is intended to provide a high level summary of feedback received for the draft salmon IFMP and highlight areas where there are potential inter-sectoral issues to facilitate discussion. The table is not intended to be a comprehensive or fully detailed representation of the feedback received. For further information, reference to the original submissions in their entirety on specific issues. 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.

Identifier	Species	Group	Key Issue Proposals Received
SC1	All	Cowichan Tribes	Resources managed to higher abundance levels
SC3	All	Area B	Efforts should be made to engage in the list of potential fisheries (attached with submission) where and when appropriate
SC6	All	QARS	Recommend that fisheries management planning incorporate scientifically relevant biological data to implement ecosystem-based management
SC6	All	QARS	Recommend that DFO prepare for early closure of in-river recreational fisheries
SC6	All	QARS	Plan for fisheries in all streams to allow for more fish to escape given potential for low-flows and high temperatures
SC6	All	QARS	DFO prioritize funding and implementation of in-river habitat assessments

SC7	All	LFFA	Interest in pursuing socio-economic analysis of Lower Fraser FSC and EO fisheries
SC8	All	FRAFS	All recreational fisheries be managed in a closed until open regime
B1	All	MCC	Priorities should include CU rebuilding, SRKW recovery and constitutional obligations to FN
B1	All	MCC	Unsupportive of increase in hatchery production
B1	All	MCC	Full review of existing hatcheries and risks to wild salmon required
SC1	Chinook	Cowichan Tribes	Protective measures to implement this year: (1) max size limits for inside waters Jan-April is 67cm except in A17 and A19(4-10) non-retention Jan-April and A18 non-retention Jan-May, (2) reduction of recreational annual catch limits by 50%, (3) during Cowichan River Flows of $\leq 7\text{cm}$, non-retention of all salmon in A17-1,2,9, A18, A19-5,6,7
SC1	Chinook	Cowichan Tribes	More concrete plans regarding fisheries management during times of extreme low-flows and high temperatures
SC4	Chinook	'Namgis	Apply same precautionary principle (25-35% reduction of exploitation) and recreational catch reductions in A12
SC7	Chinook	LFFA	Implement broad-scale, clear, enforceable actions for sustainability of Fraser chinook

SC7	Chinook	LFFA	If FSC fisheries impacted by chinook management plans, all other fisheries that impact stocks must be terminated
SC8	Chinook	FRAFS	Fishery impacts must be eliminated from commercial and recreational fisheries before FN fisheries are reduced
SC8	Chinook	FRAFS	Implement standardized and consistent management in marine recreational chinook fisheries
SC8	Chinook	FRAFS	Implement zone "0" approach - only impacts on chinook from FSC fisheries
B1	Chinook	MCC	Total mortalities on at-risk, EN and TH Fraser river chinook limited to 0% - 10%
B1	Chinook	MCC	Non-retention of chinook in recreational fisheries where populations are of concern when: (1) fishery independent catch reporting and monitoring programs in place, (2) close fisheries when ceilings are reached, (3) recreational fisheries encountering chinook are evaluated relative to CSAS SAR on FRIM
B1	Chinook	MCC	Similar non-retention of chinook approach in commercial fisheries
SC1	Chum	Cowichan Tribes	Plans be made in anticipation of managing low numbers (Low Impact Fishery)
SC3	Chum	Area B	Permit the use of power skiffs in terminal chum fisheries (A14,17,18)
SC3	Chum	Area B	Review management policies, decision rules and in-season allocation policy with industry participants at pre-season meeting in June

SC4	Chum	'Namgis	Work with DFO to gather further catch details in A12 before closures are implemented
SC5	Chum	Area D	Recommending the option of drop beckett weedlines for JS chum fishery as long as traditional JS chum openings and areas remain
SC6	Chum	QARS	DFO begin DNA stock identification program
SC6	Chum	QARS	DFO manage Nanaimo and Cowichan chum fisheries with acknowledgement that more than chum being harvested
SC6	Chum	QARS	DNA and biological samples should be collected during Nanaimo and Cowichan chum fisheries
SC1	Coho	Cowichan Tribes	Without assessment of stock abundance, no justification in opening the recreational fishery to the Cowichan River Coho
SC6	Coho	QARS	Assessment of coho in the SoG be made a priority
SC7	Coho	LFFA	Discuss outstanding priority issues related to IFC management (not meeting FSC needs)
SC8	Coho	FRAFS	Concerns about commercial and recreational fisheries having access to exploitation of IFC while FN fisheries are constrained
SC8	Coho	FRAFS	Update on work to date and work expected to be completed in 2019 on IFC
SC1	N/A	Cowichan Tribes	Further communication with DFO about how feedback is utilized

SC2	N/A	High Bar	Stronger presence of CO's and stiffer penalties for those not complying to fish regulations
SC6	N/A	QARS	DFO work with QARS to develop area-based FMP that will act as a sub-IFMP
SC7	N/A	LFFA	Discussion on issues within Ch.4 not finalized
SC7	N/A	LFFA	Inform work being through COSEWIC and SARA on Fraser salmon and how it relates to LFFN fisheries
SC8	N/A	FRAFS	Include review of commercial and recreational sectors and FN priority access in Salmon Allocation Policy
SC8	N/A	FRAFS	Explain process to which FN input was considered into re-negotiations and what extent advice gets reflected
B1	N/A	MCC	Include section in IFMP describing each fishery's progress relative to strategic framework for fishery monitoring and catch reporting
B1	N/A	MCC	Commercial operators proportion of lodge/charter-boat catch must be monitored by DFO approved observers
B1	N/A	MCC	No new fisheries permitted until they go through risk assessment and monitoring and catch reporting plans are compliant
B1	N/A	MCC	All BC salmon fisheries undergo risk assessment

B1	N/A	MCC	Rewrite all sections on monitoring and compliance to include description of accuracy and precision of compliance monitoring and catch reporting required in each fishery
B1	N/A	MCC	Include section in IFMP discussing what monitoring action will be undertaken and how effectiveness will be assessed
B1	N/A	MCC	Include section in IFMP describing how C&P will enforce required actions
B1	N/A	MCC	Comply with condition 2 of MSC certification that requires annual report with: catch and escapement statistics, total catch mortalities, methodology to calculate reference points, evaluation of performance in achieving reference points, evaluation of CU status, discussion of assumptions, findings and uncertainties
B1	N/A	MCC	All sections of IFMP should include description of 2017 CSAS SAR: Guidance to derive and update FRIM rates for pacific salmon
SC2	Sockeye	High Bar	Rebuilding of fish habitats
SC2	Sockeye	High Bar	Supportive of window closures
SC4	Sockeye	'Namgis	Supportive of Lewis Point closure
SC4	Sockeye	'Namgis	Require Nimpkish River stock data sent to Nation weekly (or quicker)
SC7	Sockeye	LFFA	LFFA work with DFO to solve issue of constraints on FSC fisheries that were not implemented on commercial and recreational fisheries

SC7	Sockeye	LFFA	Interested in exploring opportunities of wild stock ESSR fishery
SC7	Sockeye	LFFA	Discuss FSC retention of bycatch during EO fisheries
SC8	Sockeye	FRAFS	Preseason management plans should adapt to provide priority access to FSC fisheries
SC8	Sockeye	FRAFS	Harvest plans should account for unexpected migration timing
SC8	Sockeye	FRAFS	Recreational fishery should be subject to aggregate Fraser Sockeye management
SC8	Sockeye	FRAFS	Move recreational fisheries to area-based management approach
B1	SRKW	MCC	Priority feeding areas closed to fin fishing in critical habitat (Areas 123, 121/21, Juan de Fuca to Sooke (20-1 to 20-5), mouth of Fraser 29-3, 29-4, 29-6, 29-7, 29-9, 29-10, 29-12, Gulf Island subareas 18-2, 18-4, 18-9)
B1	SRKW	MCC	Total mortalities in commercial, recreational and FN chinook fisheries on south migrating stocks to WCVI, inner SC and Fraser reduced to less than 10% mortality and in early Fraser less than 5%
B1	SRKW	MCC	Terminal chinook fisheries that have spawners in excess of escapement goals executed terminally if abundance permits
B1	SRKW	MCC	Funding for enforcement and monitoring of all fishery measures

SC7	Steelhead	LFFA	Potential fishing impacts from commercial and recreational fisheries be dealt with in advance of implementing conservation restraints on LFFN FSC fisheries
SC8	Steelhead	FRAFS	FN engagement with provincial and federal IFS planning process
SC8	Steelhead	FRAFS	Provide steelhead encounter data for 2018
SC8	Steelhead	FRAFS	Address habitat issues
SC8	Steelhead	FRAFS	In-person follow up with province about steelhead protection
B1	Steelhead	MCC	Rolling window closure extended by 2 weeks at beginning and 1 week at end
B1	Steelhead	MCC	All chum fisheries have third-party validation of landings
B1	Steelhead	MCC	All fisheries have 20% fishery independent at-sea monitoring
B1	Steelhead	MCC	All lower Fraser recreational and FN fisheries from Sept-Nov have fishery independent estimates of steelhead encounters
B1	Steelhead	MCC	C&P should include comprehensive compliance monitoring and enforcement plan for recreational and commercial fisheries

B1	Steelhead	MCC	Consider potential impact of drop-outs from FSC and commercial gillnets
B1	Steelhead	MCC	Any new selective fishery in rolling window closure have 100% fishery independent monitoring

COSEWIC – Committee on the Status of Endangered Wildlife in Canada

EO – Economic Opportunity

ESSR – Excess Salmon to Spawning Requirement

FRIM – Fishing-Related Incident Mortality

CSAS – Canadian Science Advisory Secretariat

MSC – Marine Stewardship Council

FN – First Nations

EN – Endangered

TH – Threatened

IFS – Interior Fraser Steelhead

IFC – Interior Fraser Coho

QARS – Q’ul-Lhanumutsun Aquatic Resources Society

LFFA – Lower Fraser Fisheries Alliance

FRAFS – Fraser River Aboriginal Fisheries Secretariat

MCC – Marine Stewardship Caucus