



October 16th, 2019

Rebecca Reid
Regional Director General for Fisheries & Oceans Canada
Suite 200, 401 Burrard Street
Vancouver, BC
V6C 3S4

Dear Ms. Reid,

RE: Fraser Chum Fisheries

We the undersigned contend the 'generic' score given for the target level of monitoring required for Fraser chum fisheries is inappropriate and inconsistent. The Fraser gillnet sockeye fishery was assessed as requiring an 'enhanced' target level of monitoring because of its potential impacts, among other species, on IFR steelhead and sturgeon. The non-selective nature of gillnets, along with their known impacts on several species of concern, and the absence of any rigorous independent monitoring, argues for 'enhanced' monitoring in all gillnet fisheries.

We also note that there have been, thus far, no assessments for Fraser FSC and EO fisheries. We expect to be invited to participate in the Risk Assessment of the Fraser River Indigenous FSC and EO fisheries. Our representation in these assessments would provide the public with a higher degree of confidence that our salmon resources are being effectively managed in a transparent and equitable manner.

At this point it is difficult to understand how your Department can effectively manage the salmon fisheries with any precision or accuracy without implementation of the Fishery Monitoring and Catch Reporting Policy for all fisheries. And if the Department does attempt to implement the policy in a less than transparent and equitable manner by directly involving only harvesters your efforts will be seen to be conflicted and less than credible.

With your decision to no longer fund the Monitoring and Compliance Panel (M&C Panel), there is no clear way for us to effectively engage in the implementation of the Strategic Framework for Fishery Monitoring and Catch Reporting in the Pacific Fisheries other than being directly involved in the initial Risk Assessments.

We are also requesting the 2018 and 2019 retained catch and release data by species for the FSC/EO fisheries to serve as background information for our expected involvement in the 2020 Risk Assessment process. Where there are privacy concerns, we are prepared to discuss how the data can be provided to the public in a manner that doesn't contravene privacy by combining fishers, fisheries, or dates.

Please confirm your agreement with our participation, the planned dates for completion of the Fraser gillnet, FSC, and EO assessments, and when we might expect the catch and release data.



Finally, we remind you that conservation takes priority in any fishery and this was agreed to by your Department, stakeholders and First Nations years ago. This priority must always be adhered to if our salmon fisheries are to be sustainable.

Thank you in the interest of salmon conservation.

Yours sincerely,

Bill Bosch, President, BC Wildlife Federation

Ken Ashley, B.Sc., M.Sc., M.A.Sc., Ph.D., Instructor in BCIT's Ecological Restoration Program

Arnie Oram, President, Spences Bridge Steelhead Advocate Association

Greg Taylor, President, Fish First Consulting

Robert Hooton, B.Sc., Author of Skeena Steelhead: Unknown Past, Uncertain Future, Creator of Steelhead Voices

Marvin Rosenau, B.Sc., M.Sc., D. Phil, Instructor in BCIT's Fish Wildlife and Recreation Program