



July 15, 2011

Susan Farlinger
Director General – Pacific Region
Fisheries and Oceans Canada
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RE: MSC condition being ignored in Area 4 fishery

Dear Ms. Farlinger,

As you know Watershed Watch Salmon Society, SkeenaWild Conservation Trust, and other members of the Pacific Marine Conservation Caucus (MCC) supported Marine Stewardship Council (MSC) certification of the Skeena River sockeye fishery and may also support MSC certification of BC's pink salmon fisheries. The existence of useful certification conditions and the MSC's annual audit process has been the primary motivation for supporting these certifications, as part of our goal to achieve sustainable salmon fisheries in the Pacific Region.

Unfortunately, in the first annual audit this year, it was apparent that DFO and the commercial industry were behind on making progress in meeting several conditions. Some of the conditions were quite ambitious, and in those cases slow progress in this first year was understandable.

Condition 36b (below), however, is not very ambitious. It requires no expensive scientific study, no CSAP review, and no multi-stakeholder consultation process.

Condition 36b

Certification will be conditional until there is a clear commitment from the management agency and fishers to identify and implement selective fishing techniques that are consistent with the goal of reducing the catch of non-target species, especially steelhead. (Skeena Condition #3.2b).

DFO response (from Action Plan): There has been extensive research over the last 15 years to evaluate selective harvest approaches. Many of these have been implemented, resulting in very significant changes to commercial fishing seasons, geographical areas fished, daylight only fisheries, changes to gillnet configurations and the length of sets. These programs will continue to be evaluated and implemented. Monitoring and compliance of the selective fishing practices is recognized as an essential component of the management of the Skeena gillnet fishery. A report will be provided to the Certifier by December, 2010 describing selective fishing measures and outcomes.

In speaking with officials from North Coast stock assessment and resource management yesterday, it was confirmed that DFO plans to implement half nets/short sets for gillnets

starting Aug. 1, to protect beleaguered Skeena River chum stocks. Chum are now beginning to return to the Skeena, and while the Aug. 1 date provides some reduction in chum bycatch mortality, it does nothing for early-timed chum. Moreover, half nets/short sets are necessary by around July 18 to avoid excessive impacts to steelhead, which are singled out in condition 36b.

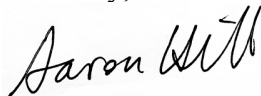
The Tye steelhead index is well below recent decade averages so far this year and we have not received a satisfactory explanation from DFO as to why selective gillnetting is not being implemented in Area 4. The IFMP explicitly allows for discretionary in-season implementation of selective gill net fisheries (Appendix 9.12).

Our requests are as follows:

1. Implementation of half nets, short sets for gill net fisheries in Area 4 starting July 18. Doing otherwise will jeopardize MSC certification of both the sockeye and pink fisheries.
2. Half nets/short sets, small mesh nets, and observer coverage for all further north coast gill net fisheries targeting pink salmon in areas 3-6. As you know, chum stocks across the north coast are in trouble. While not explicitly required by MSC conditions, half nets/short sets should have been used for all gillnet fisheries in Area 3 this season to minimize impacts on domestic chum and thereby demonstrate progress on condition 23 of the Nass sockeye certification, and to demonstrate progress on the impending conditions of the pink certification.

Thank you for your consideration in this urgent matter.

Sincerely,



Aaron Hill
Ecologist
Watershed Watch Salmon Society



Greg Knox
Executive Director
SkeenaWild Conservation Trust

c. Hon. Keith Ashfield, Mel Kotyk, Jody Shimkus, Andrew Wilson, Pacific Marine Conservation Caucus, Christina Burridge, Rob Morley, Steve Devitt, Karl English, Greg Ruggione, Mark Hume, Brad Ack, Dan Hoggarth