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August 7, 2020

Andrew Thomson  
Regional Director, Fisheries Management Branch  
Fisheries and Oceans Canada  
Vancouver, B.C.

**Re: DFO should close seine fishery in Great Bear Rainforest until independent compliance monitoring is implemented**

Fisheries and Oceans Canada (DFO) is allowing the harvest of abundant pink salmon in Area 6, within the Great Bear Rainforest, without independent compliance monitoring of chum salmon discards. DFO acknowledges Area 6 chum are stocks of concern. They are noted as such in the Pacific Salmon Outlook 2020 presentation. Further, DFO is well aware that chum stocks from Alaska through B.C. are doing poorly in 2020. This is evident in Area 6 by the very low chum CPUE in the 2020 fishery and by charter patrol reports of very low numbers of chum in Area 6 streams.

DFO has been made aware of compliance issues in this fishery since 2015 when video of non-compliance was released to the media. Watershed Watch Salmon Society and SkeenaWild Conservation Trust took action, when DFO wouldn't, by collaborating with industry and the University of British Columbia on a research program investigating chum survival in pink salmon fisheries in Area 6. The agreement founding this collaboration stated, *"Area A fishermen, processors, NGOs, UBC, and DFO are collaborating on an effort to improve the condition (vitality) of chums released in Area 6 seine fisheries for pink salmon. The objective is to maintain, or increase, fishing opportunities for pink salmon while continuing to rebuild Area 6 chum stocks."*

The research identified that limiting air exposure by ensuring chums were removed from the net, sorted from the catch in a sorting table on deck, and returned to the water within two minutes maximized survival. Ensuring compliance would require the use of video cameras and monitoring similar to what is in place for B.C.'s halibut fishery. The use of video is now commonplace as a compliance monitoring method in fisheries throughout the world.

Unfortunately, the major processors buying pink salmon on the North Coast did not follow through with the research findings and DFO followed suit by refusing to take action. The result is that we find ourselves in 2020 with an unexpected surplus of pink salmon in Area 6 and very poor chum abundance, and no independent compliance monitoring.

We therefore insist DFO immediately close the Area 6 fishery, reopening it only to boats with video cameras installed and a contract with an independent service contractor. The installation of video cameras could be done in short order.

If you would like to discuss this further, please contact Greg Taylor at [gtaylor.fishfirst@gmail.com](mailto:gtaylor.fishfirst@gmail.com) or 604-970-0277.

Yours truly



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Aaron Hill, Executive Director

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