

November 29, 2007

RE: DSF and WWSS review of Draft MSC BC sockeye assessments

Dr. Chet Chaffee  
2200 Powell Street  
Suite 725  
Emeryville, CA 94608

Dear Dr. Chaffee,

Enclosed are reviews prepared by the Watershed Watch Salmon Society and the David Suzuki Foundation of the four draft MSC assessments of British Columbia sockeye salmon fisheries. Please accept these reviews and this cover letter as “stakeholder” comments for the review period ending Nov. 30<sup>th</sup>.

These reviews are based on a thorough technical analysis of the assessed fisheries using the MSC scoring principles, criteria, and indicators. Although in some cases we have identified specific problems with the appropriateness of criteria or indicators for assessing BC salmon fisheries, the basis of our reviews primarily use the measures as used by the assessment team.

In summary, we do not support the certification of the Skeena, Fraser, or Barkley Sound sockeye fisheries. We have also identified discrepancies with the Nass sockeye assessment, but are supportive of certification with inclusion of improved conditions.

Main issues of concern identified in the reviews include:

- weak implementation and use of limit reference points
- poor definition of “target” stocks
- inconsistent and ineffective recovery of depleted stocks
- inconsistent, absent, unclear, or indefensible management objectives

In addition, the draft assessment was conducted using information available up to early 2005. The 2005 and 2006 fisheries are of significance to the assessments and should be considered. For example, serious management problems were identified in the 2006 Skeena fishery, particularly bycatch of steelhead trout. Further, many sockeye populations throughout the province have undergone significant declines and effective management actions to stop the declines, promote recovery, and ensure that fisheries are not contributing to declines or hindering recovery have not been effectively implemented. The Salmonid Specialist Group (SSG) of the World Conservation Union (IUCN) has proposed listing 10 of the 24 subpopulations assessed in B.C. as threatened (4 vulnerable, 2 endangered, and 4 critically endangered). The SSG identified mixed stock fishing and negative effects of enhancement as key threat to the species.

Although we are supportive of the use of conditions in the Nass assessment, we are strongly concerned that conditions will not be sufficient to promote the needed reforms in the Skeena, Fraser, and Barkley Sound sockeye fisheries. Further, the conditions presented in the draft assessment are numerous and we are not confident that Fisheries and Oceans Canada has the capacity or will to implement all of them fully within the five year period before re-assessment.

Supported by the strong technical basis of these reviews we request the opportunity to work with the assessment team in the re-drafting of the assessments. This interaction would allow us to further explain the basis of our reviews and identify the best options for improving the assessment. Some of the problems identified in our reviews were based on the acceptance by the assessment team of unsupported or weakly referenced statements made by Fisheries and Oceans Canada. The rigour of the assessment process depends on the use of verifiable information, particularly for supporting a passing score.

We are supportive of effective implementation of Canada's Wild Salmon Policy (WSP) and the future certification of BC salmon fisheries by the MSC. We recognize the positive incentive MSC certification provides for fisheries reform. However, although Fisheries and Oceans Canada has recognized the need to reform salmon fisheries management by creating the WSP this policy is not sufficiently implemented to support certification at this time. Until the WSP is effectively implemented, with fisheries managed to support the sustainability of conservation units and the protection of ecosystem values, we suggest that premature MSC certification could act as a negative incentive for the management changes needed.

We look forward to your response to these reviews and an opportunity in the near future to discuss them with the assessment team.

Sincerely,



Jeffery Young, MSc  
Aquatic Biologist, David Suzuki Foundation



Craig Orr, PhD  
Executive Director, Watershed Watch Salmon Society

cc Karl English, MSC BC Sockeye Assessment Team Lead  
Don Radford, Regional Director, Aquaculture and Fisheries Management, DFO  
David Einarson, North Coast Area Chief, DFO  
Paul Ryall, Salmon Team Lead, DFO  
Paul Sprout, Pacific Regional Director General, DFO  
Brian Riddell, Division Manager, DFO  
Christina BurrIDGE, BC Salmon Marketing Council