

December 22, 2016

Honourable Dominic LeBlanc
Minister of Fisheries and Oceans Canada

RE: Pacific Wild Salmon Policy under threat

Dear Minister LeBlanc:

We are writing to you with respect to the process underway in the Pacific region of Fisheries and Oceans Canada to develop an implementation plan for the Pacific Wild Salmon Policy as a means of meeting the top priority in your mandate letter to *Act on the recommendations of the Cohen Commission*. We support this objective but are concerned it is being re-directed for unjustified reasons. As such, we are calling on you to immediately direct Pacific region staff to focus on developing an *implementation* plan with stakeholders, rather than changing the very policy they are being directed to implement.

We are supportive of full implementation of the Pacific Wild Salmon Policy, which is central to the recommendations of the Cohen Commission. We agree that a detailed implementation plan is needed, with timelines, resources and accountable staff clearly identified. We are ready to work with your department, and other stakeholders, to develop a meaningful implementation plan and to help achieve it.

However, we are concerned that the process underway is misdirected and flawed, and requires immediate direction from your office. Instead of focusing on a detailed implementation plan, DFO staff are proposing to change the policy itself. Staff have identified the six strategies within the policy - which are the core of the policy itself- as the existing 'implementation plan' that requires updating. The Wild Salmon Policy refers to these six strategies as follows:

The six strategies proposed in the WSP represent a set of mutually dependent activities that must work together for the policy's goal and objectives to be achieved. Since the individual strategies are not autonomous, successful implementation of each one of them is necessary to ensure the overall success of salmon resource management.¹

Nowhere in the policy are these strategies referred to as an 'implementation plan', and instead, the policy refers to the need for a separate implementation plan².

Changing the Pacific Wild Salmon Policy at this stage puts at risk the work stakeholders and your staff have already undertaken to try to implement the policy, and it would undermine the priority to act on the recommendations of the Cohen Commission. It is also wasting

¹ Page 35, second paragraph, of the Pacific Wild Salmon Policy

² Page 35, first paragraph of the Pacific Wild Salmon Policy section *Implementation "Making it all Work"*

time and resources that should be focused on creating a detailed implementation plan for the existing policy.

Further, the rationale being used to justify changing the policy is misleading. The argument presented is the apparent need to align the policy with the habitat provisions of the Fisheries Act that were weakened in 2012. Since your department is reviewing these changes - with commitments to restoring lost protections- there is simply no basis to suggest that these weakened habitat provisions are an appropriate reason to weaken the Pacific Wild Salmon Policy.

We look forward to your prompt response to this matter and are requesting an opportunity to meet with you and your staff to discuss further.

Sincerely,



Jeffery Young
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David Suzuki Foundation
On behalf of the Pacific Marine Conservation Caucus, Salmon Committee

cc Angela Stadel
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