

# PUTTING CANADA'S WILD SALMON POLICY INTO ACTION

## Questions & Answers

### Watershed Watch Salmon Society — November 2017

The federal government has released a draft implementation plan for the *Wild Salmon Policy* and is seeking public feedback on it until December 15, 2017.

#### **I don't want to read this whole paper. What's the take-home message?**

The *Draft Wild Salmon Policy Implementation Plan* is long overdue, and a step in the right direction. It provides some useful guidance for DFO in implementing the *Wild Salmon Policy* over the next five years. However it falls short in three key areas:

1. Accountability - the draft plan makes no one responsible for ensuring the work actually gets done.
2. Funding - Effective implementation of the *Wild Salmon Policy* requires science and monitoring of salmon runs and their habitats, however the draft plan designates no new funding for this task.
3. Conservation - Rebuilding our depleted salmon runs is the most important thing that DFO must accomplish through the *Wild Salmon Policy*, and the *draft implementation plan* simply does not go far enough.

To implement the *Wild Salmon Policy*, there must be adequate resources for getting the work done, and someone who is responsible for making sure it happens.

#### **What are our recommendations?**

We will be providing detailed comments on the *Draft Wild Salmon Policy Implementation Plan*, which we will share publicly. In the meantime, our general recommendations are:

- *Clearly identify the individuals or teams responsible for specific deliverables.*
- *Appoint leaders for coordinating and overseeing work between DFO sections, First Nations, and other partners. (i.e. implement Cohen recommendation #4)*
- *Add detail that will allow for better evaluation of progress against deliverables.*
- *When summarizing language from the original policy, ensure that its meaning and intent is not lost or watered down, especially regarding the significance of red & yellow status of salmon conservation units.*
- *Produce an annual report card detailing all identified activities, and provide accounting on what has been achieved, where the activity is relative to its timetable, outstanding issues, and next steps.*

## Why is Canada's Policy for the Conservation of Wild Pacific Salmon important?

The 2005 *Wild Salmon Policy* is Canada's roadmap for managing and rebuilding depleted wild salmon populations.

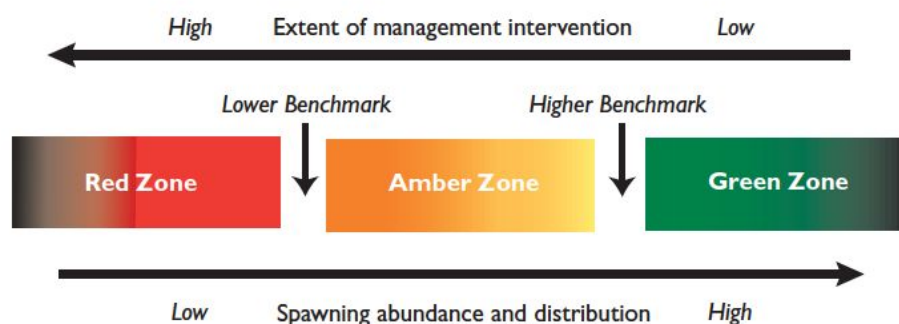
*"[The Wild Salmon Policy] specifies clear objectives, establishes strategies to meet them, and presents a decision-making process to ensure that choices made about salmon conservation reflect societal values. The policy places conservation of salmon and their habitats as the first priority for resource management."*

— The Honourable Geoff Regan, Minister of Fisheries and Oceans, 2005.

## How does the *Wild Salmon Policy* work?

At its core, the *Wild Salmon Policy* commits government to defining all of the "conservation units" representing the full irreplaceable diversity of Pacific salmon in Western Canada. It also commits government to assigning a red, yellow, or green status to each of these conservation units, as well as to their habitats (see figure below from *Wild Salmon Policy*). Conservation units in the red zone require protection and the development of a recovery plan to bring them out of the red zone.

**Figure 3** Benchmarks and biological status zones to be determined for each CU



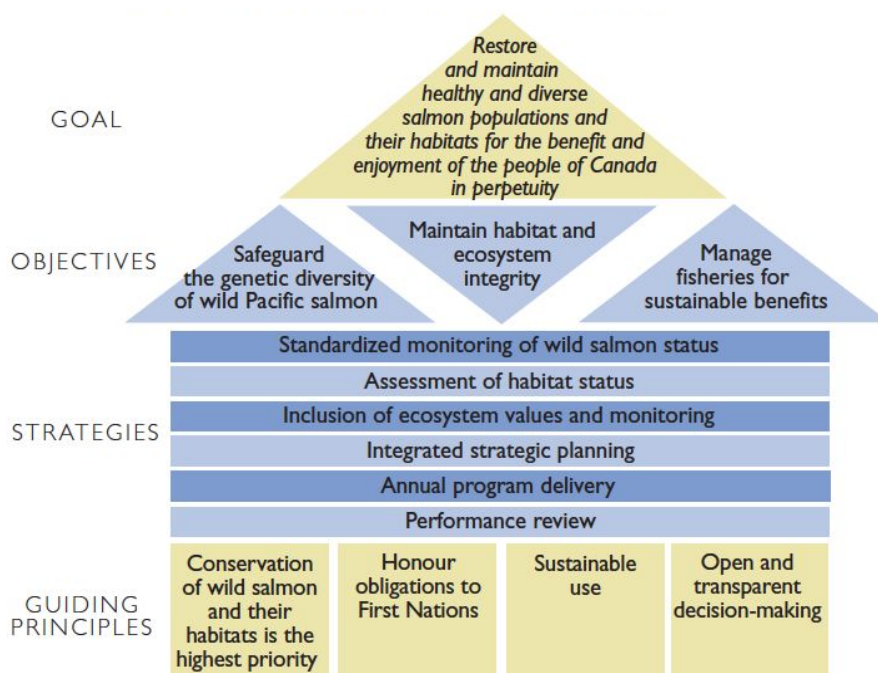
(Source: *Canada's Policy for the Conservation of Wild Pacific Salmon*, 2005)

Unlike many other government policies that are all talk and no action, the *Wild Salmon Policy* sets out “action steps” for carrying out each of its six strategies:

**Table 1 WSP strategies and action steps**

<p><b>1. Standardized monitoring of wild salmon status</b></p> <ul style="list-style-type: none"> <li>♦ Identify Conservation Units</li> <li>♦ Develop criteria to assess CUs and identify benchmarks to represent biological status</li> <li>♦ Monitor and assess status of CUs</li> </ul>
<p><b>2. Assessment of habitat status</b></p> <ul style="list-style-type: none"> <li>♦ Document habitat characteristics within CUs</li> <li>♦ Select indicators and develop benchmarks for habitat assessment</li> <li>♦ Monitor and assess habitat status</li> <li>♦ Establish linkages to develop an integrated data system for watershed management</li> </ul>
<p><b>3. Inclusion of ecosystem values and monitoring</b></p> <ul style="list-style-type: none"> <li>♦ Identify indicators to monitor status of freshwater ecosystems</li> <li>♦ Integrate climate and ocean information into annual salmon management processes</li> </ul>
<p><b>4. Integrated strategic planning</b></p> <ul style="list-style-type: none"> <li>♦ Implement an interim process for management of priority CUs</li> <li>♦ Design and implement a fully integrated strategic planning process for salmon conservation</li> </ul>
<p><b>5. Annual program delivery</b></p> <ul style="list-style-type: none"> <li>♦ Assess the status of Conservation Units and populations</li> <li>♦ Plan and conduct annual fisheries</li> <li>♦ Plan and implement annual habitat management activities</li> <li>♦ Plan and implement annual enhancement activities</li> </ul>
<p><b>6. Performance review</b></p> <ul style="list-style-type: none"> <li>♦ Conduct post-season review of annual workplans</li> <li>♦ Conduct regular reviews of the success of the WSP</li> </ul>

## An Overview of the Wild Salmon Policy:



### Why is DFO producing a draft implementation plan 12 years after the *Wild Salmon Policy* was released?

Producing an implementation plan for the *Wild Salmon Policy* was a key recommendation of the *Cohen Commission of Inquiry into the Decline of Sockeye Salmon in the Fraser River*. Implementation of the policy has been slow, inconsistent, and hampered by a lack of funding and political will.

The Cohen inquiry took nearly two years, cost Canadian taxpayers approximately \$37 million, and released its 1100-page Final Report in 2012 with 75 recommendations to improve management of B.C.'s wild salmon, including these ones regarding the *Wild Salmon Policy*:

**Recommendation 4:** “The Department of Fisheries and Oceans should immediately create a new position in the Pacific Region at the associate regional director general level with responsibility for

- Developing and implementing the *Wild Salmon Policy* implementation plan recommended under Recommendation 5; and
- Supervising the expenditure of funds provided under Recommendation 6 for implementation of the policy.

**Recommendation 5:** “...by March 31, 2013, publish a detailed implementation plan of the *Wild Salmon Policy*, stipulating

- *What tasks are required;*
- *How they will be performed and by whom;*
- *When they will be completed; and*
- *How much implementation will cost, as set out in a detailed itemization of costs”*

**Recommendation 6:** “The Government of Canada should establish dedicated Wild Salmon Policy funding sufficient to carry out the Department of Fisheries and Oceans’ Wild Salmon Policy implementation plan and to cover ongoing operational costs.”

Another report commissioned by the federal government (the *Gardner-Pinfold Report*) also calls for the development of a detailed implementation plan.

### How does the *Draft Implementation Plan* measure up?

Overall, the *Draft Implementation Plan* provides useful guidance for DFO’s implementation of the *Wild Salmon Policy* over the next five years. However, set against Justice Cohen’s recommendations, the plan falls short (see table below).

<b>What Justice Cohen requested: “...a detailed action plan for the Wild Salmon Policy, stipulating...”</b>	<b>How DFO’s Draft Implementation Plan delivers on each piece:</b>
• <i>What tasks are required;</i>	→ Mostly achieved
• <i>How they will be performed and by whom;</i>	→ “How” is covered at a general level, but for most actions, detail is lacking → “Whom” is extremely vague, often only identifying the responsible branch at DFO (i.e. “Science” or “Management”)
• <i>When they will be completed; and</i>	→ Timelines are mixed: some are appropriate while others are vague or non-existent
• <i>How much implementation will cost, as set out in a detailed itemization of costs.”</i>	→ Costing is non-existent other than to say that everything will be done within existing budgets

### How exactly is accountability lacking in the draft plan?

While the *Draft Wild Salmon Policy Implementation Plan* specifies the DFO section responsible for various actions, it fails to identify the people or teams within each section who will be held responsible for ensuring the required actions are completed within the identified timelines.

In order to effectively implement a robust policy, there needs to be someone responsible for coordinating and overseeing actions taken by management, science, enforcement, and other branches of DFO involved in the successful implementation of the *Wild Salmon Policy*. As with any large-scale project, there needs to be accountability within DFO and First Nations, stakeholders, and community members. The draft implementation plan does not specify the people or teams responsible for asking whether the chosen tactics are achieving the desired outcomes, and whether ongoing data and information collected during the implementation phase suggests that additional or different actions should be taken.

### **The feds aren't committing any new money to implement the Wild Salmon Policy. Why is that a problem?**

A recent conservation assessment co-authored by SFU and Raincoast Conservation Foundation found that the number of spawning streams monitored is at all-time low in the north and central coast, resulting in data deficiency for 50 per cent of all managed salmon populations in these regions (Price et. al, 2017).

According to the Cohen Commission, existing funding within the DFO Pacific Region's budget is insufficient for full implementation of the policy. DFO has not committed additional funding towards the implementation of the *Wild Salmon Policy* nor included an implementation budget within the draft document. It will be impossible to implement the policy without more comprehensive information on the status of wild salmon populations. In the words of Professor John Reynolds, one of the study's authors, "you can't manage salmon populations if you don't know how they're doing."

### **Does the Draft Implementation Plan stay true to the original Policy?**

In several cases, language from the original Policy has been summarized inaccurately in the draft implementation plan.

The guiding principle of the 2005 *Wild Salmon Policy* was to identify salmon stocks that are at risk -- or in the red zone -- and to rebuild populations until they are determined to be safe, or within the green zone. The original WSP states that: "the presence of a conservation unit (CU) in the red zone will initiate an immediate consideration of ways to protect the fish, increase their abundance, and reduce the potential risk of loss."

The current draft document undermines the intent and objective of the original WSP plan by lowering the benchmark between Red and Amber zones, allowing for salmon populations to persist rather than to thrive. Specifically, the draft plan states that "the lower benchmark between Red and Amber is set at a high enough level of abundance to provide a substantial buffer between it and any level where a conservation unit would be considered at risk of extinction by the *Committee on Status of Endangered Wildlife in Canada* (COSEWIC)."



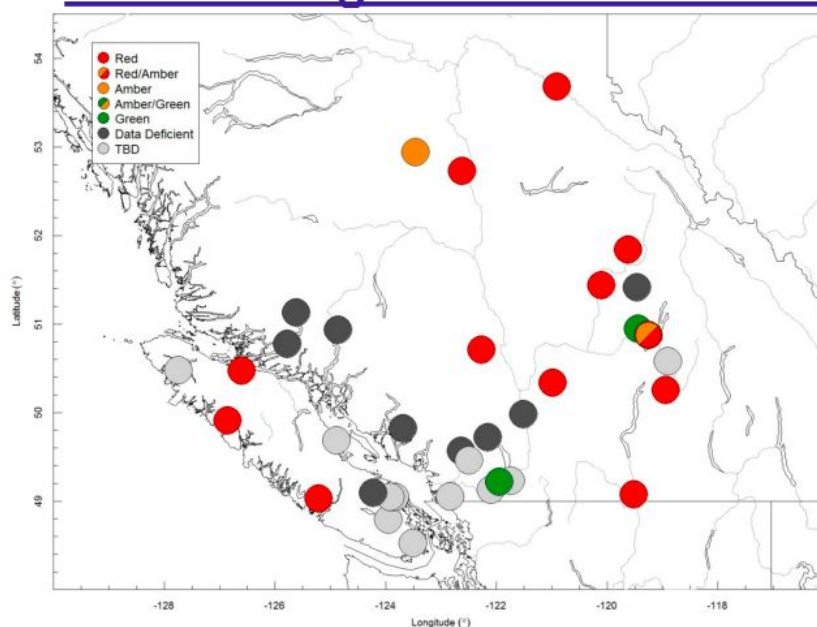
According to the DFO WSP Biological Status Assessment, 11 of the CUs for southern B.C. chinook salmon are at risk (Red Zone), with an additional 20 CU that are either data deficient or 'to be determined'. These chinook salmon are the primary food source for southern resident killer whales, which have been impacted by malnutrition and low birth rates. Recent research has indicated that this may be linked to a lack of chinook salmon availability (Wasser et al., 2017).



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## WSP Biological Status Assessment



- 2 **Green** CUs (although 1 is provisional and is flagged for closer monitoring)
- 1 **Amber** CU
- 1 **Amber/Red** CU
- 11 **Red** CUs
- 9 **Data Deficient** CUs (not enough data of sufficient quality to make an assessment)
- 11 **To Be Determined** CUs (pending clarification of enhanced contributions)

Figure: Map of southern BC summarizing workshop consensus on biological status of southern BC chinook salmon CUs. Source:

[http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2016/2016\\_042-eng.pdf](http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2016/2016_042-eng.pdf)

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To follow the results of this feedback process, and to learn more about issues affecting B.C.'s wild salmon, please visit [www.watershedwatch.ca](http://www.watershedwatch.ca). And feel free to contact us at [salmon@watershedwatch.ca](mailto:salmon@watershedwatch.ca).

## References and additional information

Price, M. H., English, K. K., Rosenberger, A. G., MacDuffee, M., & Reynolds, J. D. (2017). Canada's Wild Salmon Policy: an assessment of conservation progress in British Columbia. *Canadian Journal of Fisheries and Aquatic Sciences*, 74(10), 1507-1518.

Wasser, S. K., Lundin, J. I., Ayres, K., Seely, E., Giles, D., Balcomb, K., ... & Booth, R. (2017). Population growth is limited by nutritional impacts on pregnancy success in endangered Southern Resident killer whales (*Orcinus orca*). *PLOS one*, 12(6), e0179824.

Canada's Policy for Conservation of Wild Pacific Salmon 2015 -  
<http://waves-vagues.dfo-mpo.gc.ca/Library/315577.pdf>