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The Honourable Geoff Regan
HOUSE OF COMMONS
Minister, Fisheries and Oceans
Parliament Buildings, Wellington Street
Ottawa, Ontario
Canada, K1A 0A6

February 18th 2005

Dear Mr. Regan,

Our Vision:
Individuals and communities making sustainable lifestyle choices in B.C.'s riversheds.

Re. Proposed Federal Wild Salmon Policy

Honourary Board:

Mark Angelo
Robert Bateman
Richard Bocking
Ric Careless
John Cashore
Dr. Richard Kool
Dr. Milton McClaren
Maurice Nahanee
Tim Palmer
Svend Robinson
Dr. David Suzuki

Instead of clarity, conviction and leadership the WSP provides ambiguity, contradiction, and business as usual. This half-hearted policy is a major disappointment. **This policy will not result in conserving wild salmon stocks and is fundamentally flawed in many ways.** It is clear to the Rivershed Society of British Columbia that a major rewrite of this policy is required.

Weak policy language and structure

Every policy has 3 elements – problem recognition and definition; goals; and means/instruments to accomplish the goals.

Problem definition

Policy by definition is, “a course of action or inaction chosen by public authorities to address a given problem or an interrelated set of problems.” What is implied in this definition is the need to recognize a problem in the first place and secondly to clearly define the problem(s). **What problems are being recognized in this policy and how they are defined?**

It appears that the main problem articulated in this paper is that there may not be enough salmon in the future for commercial interests to maintain their livelihood. There is no recognition of the problem of declining wild stocks as they are seen as “relatively plentiful”. It is remarkable that the crisis that motivated the Federal Government in 1998 to produce the ‘New Direction for Canada’s Pacific Salmon Fisheries’ policy is now behind us.

Two of the real problems not articulated in this policy include:

1. That fish farms are negatively impacting wild salmon here and elsewhere in the world. The weight of evidence is clear and the position taken by Fisheries and Oceans to fund and support this conflict of interest is nothing short of shocking. Re-directing funds away from stewardship groups and basic salmon research, not to mention staff cuts into salmon farming is mismanagement in the extreme. **Why is this policy putting salmon farms first as opposed to the stated goal of putting wild salmon first?**
2. That there are major gaps in management information when estimated returns are off by millions of fish. An advisory report and background paper issued by the Pacific Fisheries Resource Conservation Council (PFRCC) warned that salmon conservation risks are increasing due to budget and program cuts in Fisheries & Oceans Canada. It also went on to identify instances where reductions in fish monitoring and assessment are leading to troubling knowledge gaps about the status of stocks. **How can sustainable levels of fishing and sound management decisions be established when there is a serious lack of knowledge?** All the wonderful statistics that have been carefully chosen in this policy ignore the large gap in missing information. This is disgraceful! One would expect a Wild Salmon Policy to begin rectifying this absurdity and begin systematically filling the gaps.

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Goals

The stated goal of this policy is narrow and consistent with a 'utilitarian' ethic, not a conservation ethic. "Maintain healthy and diverse salmon populations and their habitat for the *benefit and enjoyment of the people* of Canada in perpetuity". The overriding ethical position that pervades this policy is that fish are to be viewed and treated as a commodity, for the utility of humans. This ethic is in stark contrast to a true 'conservation' ethic where man is considered to be part of the web of life and every living thing has a purpose and a right to exist because we are all connected. **The goal of a wild salmon policy should be specific to wild salmon and it should be conservation-based not utilitarian-based.**

Means and instruments.

The means to effectively conserve wild salmon stocks needs to be different than what is being done today. Granted, there are improvements being made in the commercial fishery since the 1998 New Direction policy such as a smaller fishing fleet, non-competitive zones and more selective fishing methods. The government deserves credit for showing leadership in this area. The new WSP does not follow that lead.

Government has the ability to use a wide array of instruments to improve the situation such as regulation, economic instruments, human and financial resources, supporting stewardship groups, etc. DFO, through this policy, has not outlined effective means for implementing this policy.

We need the WSP because we are losing precious genetic material at an alarming rate and all the signs are that this will continue and probably accelerate. The reasons for the decline are many and they are largely the result of actions and inactions by humans from the Federal Government down to individuals. It is not because of some externality that we do not control climate change, El Nino, or the like. It is through our behaviour and our combined efforts that solutions will be found. For that reason, we all need to understand our respective roles. What we need from the WSP is an overarching framework that sets the strategic direction and provides clear constraints (boundaries) for Provincial and local governments to ensure consistency and to avoid duplication. The WSP fails in this regard. **The WSP should be providing leadership and a clear direction for the conservation of wild stocks not a convoluted process of public consultation that is primarily focused on the issue of allocating salmon catches.**

Lack of a conservation ethic

Definition of Conservation

The definition of conservation chosen for this policy, 'wise use', is bizarre. Of all the definitions that could be used to guide this important document, the one chosen is from a little known U.S. forester from the 1930's that wasn't even associated with the Conservation Movement. A more appropriate definition would be from Aldo Leopold where conservation is defined as "a state of harmony between man and the land".

It is most disturbing to see how the 'wise use' philosophy from the U.S. permeates throughout this policy. The main agenda of this association of business-and industry-funded interest groups is to dismantle environmental regulations. While the Wise Use movement claims to support "sustainable" use of land and resources, it most often advocates policies designed to provide short-term economic gains to large industries. **The definition of conservation needs to be changed and conservation needs to be the guiding principle in the policy.**

Conservation and the Precautionary Principle

Conservation and biodiversity is about conserving the precious genetic material that has served salmon so well for so long. Genetic variation is the key to resilience, adapting to changing conditions. Once it is gone it is gone forever! Resilience is even more crucial given the rate of climate change. That is why the precautionary principle (PP) is seen as our best strategy for the future. This policy makes a passing reference to the PP and then proceeds to ignore it in a lame attempt at rationalizing salmon farms. This is an insult to people's intelligence! The result is a lack of credibility. **How are you going to get people on board and part of the solution with this obvious conflict of interest and disregard for a fundamental principle?**

Sustainability

The overarching theme in this policy is arriving at some magical 'balance' between competing interests. On page 8 'making management decisions about wild Pacific salmon that will balance the needs of salmon with the values of Canadians who have an interest in them". What a ridiculous statement! How can one balance the needs of salmon? Why are we only concerned about Canadians that have an interest in them like they are just a commodity? Given that conservation is not regarded as an interest, the balancing act becomes one of maximum sustained yield and allocation between commercial and recreation interests. It is not about balancing economic, environmental and social interests with a view to the long term. It seems to be more about using traditional cost/benefit analysis to arrive at exploitation rates. True sustainability looks at full cost accounting or multiple account analysis. This policy does not recognize the inherent ecological limits nor is the policy truly concerned about inter-generational equity. The policy claims that wild salmon are a first priority and then goes on to discuss how

wise use of the resource will be determined through a magical balancing act. The contradiction in this policy is glaring.

This contradiction and other inadequacies noted in this policy is captured well in this quote from a paper written by a Liberal MP, Charles Caccia: "What we see emerging at the political level is a choice: we either adopt the idea of sustainable development as the integration of the economy, the environment and social values, buttressed by the precautionary principle, or we see sustainable development as an undefined balance between the environment and the economy, accompanied by a vague approach to precaution, guided by a high degree of risk taking". True sustainability recognizes that economic and cultural sustainability **depends** on a healthy, functioning environment. Without wild salmon this cannot be achieved. **The WSP should adopt a stronger definition of sustainability that recognizes resource limits and integrates social and economic factors.**

Convoluting and weak implementation that is more focused on harvest allocation than on protecting wild stocks

Implementation and habitat protection

Conservation units (CU)

The authors of this policy seem to think that if they label something a certain way then the power of suggestion will make it so. Conservation units sound like they are designed to conserve salmon. In effect, however, they are so large that they are designed to do the opposite. The wild stocks in small streams are being ignored. **How can all the Coho populations in the Lower Fraser River be placed in a single CU?** This strategy is more about administrative expediency and maintaining existing budgets than it is about conserving wild salmon. Instead of admitting the knowledge gaps, acknowledging and working with others to fill the gaps and managing the resource at a scale that is effective, this policy essentially maintains the status quo and outlines an implementation strategy that makes it look like DFO is doing something. **The CU's are too large to effectively manage the resource.**

Implementation should emphasize partnerships with local government and stewardship groups that are making habitat decisions on a daily basis. These groups have a lot of detailed information. There is no need to waste money by duplicating work. Local government is actively preparing Watershed plans mandated by the Liquid Waste Management Plan of the Greater Vancouver Regional District. This is a major step towards protecting salmon habitat. Not only should this policy acknowledge this work the Federal government should show leadership by requiring and supporting this initiative in urban areas. The State of Washington requires Watershed Plans and provides significant financial support for preparing them. This is a critical step in habitat protection that the Federal and Provincial governments should undertake. **The Federal government should require and financially support the preparation and implementation of Watershed Plans throughout the province.** As stated on page 16, "The first and preferred approach is prevention of habitat loss through avoidance and mitigation".

Supporting Stewardship groups is one of the best investments the government can make in salmon protection and enhancement. Every dollar invested conservatively leverages another 5 dollars of value. And yet, there has been a systematic cutting of support by the DFO. This is irrational. **The Federal Government needs to substantially reinvest in stewardship.**

The implementation strategy is misdirected, convoluted, unsystematic, confusing, time-consuming, wasteful and is most concerned with salmon allocation issues. The emphasis is on consultation when what is really needed is leadership and an overarching policy that sets direction and boundaries/constraints for fish protection that lead to creative solutions.

The proposed Interim Planning strategy is a form of crisis management - entirely focused on sensitive or red CU's and 'those that could significantly limit fishing'. Response teams are going to be mobilized and then go through some lengthy planning process to arrive at a strategy that is supposed to put fish first but is really about protecting allocation expectations. By the time the process is complete, there may be some wild stock left. Given the DFO's limited resources, there will only be time to go from one crisis red zone to the next because the other colored zones are not a priority until they reach the red status. **Instead of systematically dealing with wild stocks by a combination of regulations and adequate resources the policy advocates keeping the status quo and moving from one crisis to the next at the expense of the resource.**

Appendix 3 – Alternative approaches.

This discussion of top-down and bottom-up management makes no sense! The use of this terminology and comparing it to biological systems is pure nonsense. It appears to be some convoluted way of justifying the over-arching utilitarian ethic instead of a conservation-based policy that actually puts salmon first. **Debating whether a planning approach should follow a process used for harvest interests (exploitation model) or one where fish are considered first (sustainability model) makes it obvious that this policy is not conservation oriented and lacks direction.**

Lack of simple, clear policy

This policy paper is too long, poorly written, full of contradictions and does not provide a clear picture. This policy is overdue and extremely important and yet people are disenfranchised by having to spend an inordinate amount of time deciphering this policy. There are so many shortcomings in this policy that a person would need to spend weeks on end preparing a reply. No one has that kind of time. **When this policy is re-written it needs to be shorter, succinct, clear and not contradictory.**

In summary, this policy is will not result in the conservation of the Pacific wild salmon, it will position West Coast Wild Salmon for the same fate as the East Coast Cod.

Visit www.rivershed.com for more information about the RSBC.

If you have any questions, please call me at (604) 941-5937.

Sincerely,

Dave Palidwor
Chair, Policy Committee
Rivershed Society of British Columbia

cc. Minister Stephane Dion, Environment Canada
James Moore, Member of Parliament, Port Moody-Westwood-Port Coquitlam