

Wild Salmon Policy or Goodbye Salmon Policy?

By Elaine Golds, for Burke Mountain Naturalists January newsletter

It's always raises one's suspicions that, when a report is released from government late on a Friday afternoon, the main objective is to minimize public scrutiny. So, when DFO released the long-awaited Wild Salmon Policy (WSP) on the Friday before the Christmas break, my alarm bells went off. This new 50-page report, originally released for public consultation in an earlier draft over 4 years ago, is, to my mind, a cause for concern (http://www-comm.pac.dfo-mpo.gc.ca/pages/consultations/wsp/default_e.htm). In fact, you may ask, why is DFO planning on shifting to a complicated new policy framework at a time when the federal Ministry of Fisheries and Oceans is strapped for cash and appears to be facing more cutbacks? Wouldn't it be wiser, during such financially challenging times, to stay the course rather than move into uncharted waters? And, do we really need another policy change? After all, it was only in 1998 that DFO released a policy entitled, "A New Direction for Canada's Pacific Salmon Fisheries". That was a plan which put conservation first – has such an approach become outdated?

The WSP starts out sounding not too bad – its goal is "to restore and maintain healthy and diverse salmon populations and their habitat for the benefit and enjoyment of the people of Canada in perpetuity". Certainly, given the iconic nature of Pacific salmon to many people on the west coast and the fact that salmon are a keystone species in riparian ecosystems, some stronger language would be an improvement. This goal of the WSP will be "advanced by safeguarding the genetic diversity of wild salmon populations, maintaining habitat and ecosystem integrity and managing fisheries for sustainable benefits". But then the worrying, weasel words begin to appear...wild salmon will be managed by first identifying conservation units (CUs). A CU is defined as a group of wild salmon sufficiently isolated from other groups that, if lost, is very unlikely to recolonize naturally within an acceptable time frame (e.g., a human lifetime). Now, I might feel more comfortable with that definition if the time frame was specified as certain period, that is to say, was written "i.e." and not "e.g.". While CUs are poorly defined throughout the WSP, it is clear that these units are too large. For example, all the coho populations in the entire lower Fraser River are placed in a single CU. If I was to expect a sufficient number of coho from the Harrison River to stray into Hoy Creek in Coquitlam to re-establish a lost run, I know that I would likely have to wait longer than my lifetime. Yet, according the to WSP, coho from Harrison River and Hoy Creek belong to the same CU. This sounds more like a strategy for DFO to abandon small streams while focussing on a few big ones to keep salmon production up within each CU.

When the draft WSP was circulated for public consultation 4 years ago, many concerns were raised over the lack of definition for the proposed CUs. At that time, some members of the public suggested there should be least 9000 CUs for salmon in BC (including all 5 species). In contrast, the just-released WSP appears to indicate there are only 185 CUs of Pacific salmon in Canadian waters including only 15 CUs for all the coho in BC. The WSP states that harvest management will change from a focus on the conservation of individual runs to conservation of the CUs. To me, that sounds like a

recipe to justify the extinction of salmon populations in many streams as long as a few rivers continue to produce. How can this be called conservation of wild salmon?

During the consultation 4 years ago, the public emphasized the importance of protecting salmon habitat plus supporting stewardship and raised concerns about the impacts that salmon farming was having on wild salmon. So will the WSP protect wild salmon? Let me quote from page 34: “Aquaculture operations will be regulated in a manner consistent with other human activities that may adversely affect salmon or their habitat”. Hmm, could I take this to mean that that DFO will continue to do little to protect wild salmon from aquaculture activities? The WSP goes on, “if specific CUs of wild salmon are threatened by aquaculture operations, corrective actions will be taken under the Fisheries Act or longer-term solutions will be pursued as part of an integrated planning process”. Why is it that the Fisheries Act, which dates back to 1867, still seems to be the most effective piece of legislation we have to protect salmon? Does this mean if DFO places the Broughton Archipelago salmon in a larger CU, they create the rationale to ignore impacts that aquaculture is having on these salmon?

When I expressed my dismay at the lack of a map outlining the boundaries of CUs in the WSP or a better definition of CUs, I was told by a DFO official that, “There is no map of all the CUs as finalizing the identification of these is a major task to be finalized in consultation with local organizations”. In other words, a major concern raised in public consultations 4 years ago not only remains unresolved but also appears to be moving in exactly the wrong direction, i.e., towards large CUs. What’s worse, the WSP is suggesting that several CUs could be lumped together for planning purposes into what are called planning units – 56 of these are proposed for all of BC.

But it gets worse. All the CUs are proposed to be ranked as to their biological status, i.e., they will be placed in a red, amber or green zone (rather like the American terrorist alert system, I suppose). If a CU is in the red zone, then biological considerations will be the primary driver for its management. However, if a CU is in the green zone, then social and economic considerations will be paramount for management. In other words, if a salmon population is healthy, DFO is likely to allow it to be overfished because that’s what happens when social and economic considerations come first. Should not biological considerations always be primary if the goal of the WSP is “to restore and maintain healthy and diverse salmon populations and their habitat”? The WSP seems to anticipate some losses as it states “some localized groups of salmon may disappear over time as the result of natural variation or human impacts”. And that is supposed to be OK?

I was also surprised how “conservation” was defined. The WSP uses an antiquated definition first coined by Gifford Pinchot (head of the USA Forest Service in the early 1900s), namely; “Conservation is the wise use of resources”. Huh? I thought conservation was the act of preserving, guarding, protecting or preserving from loss, decay, injury or violation. For a natural resource such as salmon, conservation implies careful management such that no loss occurs in the resource over generations of time. I cannot image that any modern day biologist would accept Pinchot’s slick definition; it’s

inappropriate in a government document written by scientists in 2004. In fact, the phrase, “wise use of resources” should be avoided at all costs because it was hijacked in 1989 by the Wise Use Movement, a group of right-wingers in the States who believe that all resources, including the oil in the Arctic National Wildlife Reserve should be extracted for human use. This group also thinks that trees are for people to use, not spotted owls.

Certainly, a greater emphasis on maintaining wild salmon stocks rather than hatchery-enhanced populations is commendable. Salmon are defined as “wild” in the WSP if they and their parents are offspring of fish that spawned and grew up in natural surroundings. In areas where hatcheries have been established to restock a stream, then hatchery-derived salmon that return to spawn naturally in the stream would be considered wild after two generations. A greater emphasis on wild salmon is also in keeping with recent initiatives of DFO to restore natural habitat in streams rather than to rely only on hatcheries or artificial rearing channels to rebuild stocks. With regard to the Salmonid Enhancement Program (SEP) under which so many streamkeeper groups work in partnership with DFO, adoption of the WSP apparently means that SEP will continue to evolve towards greater emphasis on community stewardship and habitat restoration. This is also commendable providing, of course, that DFO will provide sufficient funds and technical support to community volunteers and recognizes that smaller hatcheries play a valuable educational role in many communities. A strong and renewed commitment for funding for SEP and other stewardship initiatives seems to be lacking in the WSP.

The WSP also calls for changes to habitat management. Presently, DFO habitat biologists apparently spend 75% of their time dealing with project reviews, only 5% on monitoring and 20% on “early intervention”. I can’t tell what “early intervention” is as it’s not defined but I suppose it’s not some form of daycare for young salmon. The goal of the WSP is to shift DFO staff time so that more effort is spend on monitoring (20%) and early intervention (45%). Personally, it has been my experience that time spent on project review is well spent because it is a pro-active approach to preventing habitat loss. Input from DFO staff on, for example, the Hyde Creek Integrated Watershed Management Plan in Coquitlam was invaluable. I would hate to see DFO staff removed from such a role. Not too many years ago, I remember when DFO staff would appear at public hearings for urban development and speak up for protection of fish habitat and preservation of the riparian ecosystem. Regrettably, those days are long gone and community volunteers are often the only voice calling for protection of fish and wildlife habitat in rapidly-developing urban areas.

I fear that if the WSP moves to a more streamlined approach with a one-size-fits-all attitude towards the permitting and the habitat-compensation planning process, we will lose valuable opportunities for partnerships with community stewards. DFO staff will have less time to become familiar with the characteristics of individual streams; we will see a rubber-stamp approach to habitat compensation. In the lower Fraser, development pressures on the remaining urban streams will increase tremendously over the next few years. Under the new Riparian Areas Regulations, there appears to be few, if any, opportunities for community stewards to work with developers and their consultants to develop integrated watershed management plans for urban streams. This is

a poor time for DFO habitat biologists to become more invisible in the community and play less of a role in reviewing development projects.

DFO apparently hopes to implement the WSP through five Strategies each with multiple steps that I will attempt to summarize. Strategy 1 will entail standardized monitoring of wild salmon status which will include the identification of CUs, colour-coding the CUs and identifying benchmarks to represent biological status, then monitoring the status of the CUs. Strategy 2 will involve assessing habitat status, developing generic standards, indicators and benchmarks, monitoring within CUs then building linkages to develop an integrated data system for watershed management. Strategy 3 will be the inclusion of ecosystem values and more monitoring including identifying indicators to be used in the monitoring of the status of freshwater ecosystems as well as monitoring annual variations in climatic and oceanic conditions. Strategy 4 will involve integrated strategic planning which will specify long-term biological goals for CUs and groups of CUs. Strategy 5 will be the development of a longer-term context for annual operational and business planning. I have to admit the description of these Five Strategies in the WSP left me rather in the dark but it does sound like an awful lot of planning for a limited number of DFO staff whose time, I feel would be better spent on keeping streams full of fish and riparian corridors full of trees. At any rate, I expect the identification of CUs and subsequent colour coding will take so much time and create so much controversy that it will be some time before the WSP can proceed beyond Step 1 or 2 of Strategy 1.

When the draft WSP policy was released in 2000, extensive community consultation occurred around the province with a number of public meetings and open houses. This time, although consultation has been promised, the form it will take is presently unclear. Apparently, DFO feels that the WSP's goals, principles and objectives were established in previous consultations; this time they appear to hope the public will focus comments on the five implementation strategies. A final WSP is expected to be announced by June 30, 2005. My benchmark for assessing this new policy is to ask if the salmon in local urban streams will receive improved or decreased protection and attention from DFO. My reaction is that things appear to be taking a turn for the worse.

Written comments on the draft WSP are invited until February 18 and can be submitted to Wild Salmon Policy Consultations, Policy and Economic Analysis Branch, Fisheries and Oceans Canada, 200-401 Burrard St., Vancouver, BC V6C 3S4 or submitted by email to: wsp@pac.dfo-mpo.gc.ca or faxed to (604) 666-3295. Just so that your well-crafted comments don't get buried in a bureaucrat's summary, I also suggest that you send a copy to the Honorable Geoff Regan, Minister of Fisheries and Oceans, Parliament Buildings, Wellington Street, Ottawa, Ontario, Canada, K1A 0A6 or email him at Min@dfo-mpo.gc.ca.