



Wild Salmon Policy
Policy and Economic Analysis Branch
200-401 Burrard Street
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February 18, 2005

Re: KEEPS position on DFO Wild Salmon Policy

The Kanaka Education and Environmental Partnership Society (KEEPS) is a Maple Ridge based stewardship organization whose primary interest is the health of the Kanaka watershed and its inhabitants, particularly salmonids. As such, we have reviewed the DFO December 2004 publication "A Policy Framework for Conservation of Wild Pacific Salmon". We have the following comments and concerns.

- (1) Our interpretation of the language in the document is that there is insufficient will on the part of DFO to consistently and adequately protect smaller salmon stocks, such as Kanaka watershed origin coho. This concern is first raised in the "snapshots" on Page 7, Bullet 9, where it is mentioned that the Minister may limit measures to protect wild salmon if social / economic costs to recover a Conservation Unit are extreme. We see similar language within the Guiding Principles and Objectives on Pages 20 and 21, where Principle 3 states that conservation decisions can not be based solely on biological information, and Objective 1 reads, to us, that DFO finds the periodic loss of certain populations to be inevitable and acceptable. Objective 3 on Page 25 gives us the distinct impression that DFO considers the scientific community, presumably within DFO, as only one voice at the decision making table.

KEEPS believes that it is DFO's responsibility to be the senior level of government that champions wild salmon, wherever they occur, and to have final authority concerning the protection of salmon stocks and their habitat. We believe that the language of the Wild Salmon Policy states a desire of DFO to soften their stance in this regard. We find this to be unacceptable.

- (2) It is our opinion that the delineation of salmon stocks into Conservation Units is seriously flawed in light of both the manner in which the CU's are broken down as well as the management implications in the WSP document. For example, we find in the document that "Coastal Fraser River coho" constitutes one CU. We then refer to Objective 1, Page 20, which says that losses of some localized spawning groups within a CU may occur, but these losses do not imply extirpation of the CU. KEEPS can visualize a scenario where Kanaka origin coho, already under increasing pressure from urbanization, become eliminated with little or no action from DFO since the overall status of the Vancouver to Lytton Conservation Unit hasn't declined enough to be a serious concern. It is of little comfort to us to know that stocks at Chilliwack or Harrison are healthy while the salmon in our backyard streams are abandoned.
- (3) Our examination of the WSP document leads us to conclude that a desire to maximize harvesting opportunities of sockeye salmon has driven much of the production of this document and the policies it contains. This would represent a dramatic shift from the conservative harvesting policies of recent years. If commercial harvesting and economic factors are indeed the top priorities, then we believe

that the WSP document is correct when it forecasts that smaller stocks will occasionally be lost in the shuffle. We, as a stewardship organization that works to preserve and protect one of these smaller stocks, cannot accept this mindset.

We ask that you take our concerns into careful consideration.

Sincerely,

ROSS DAVIES

Coordinator

For: KEEPS Board of Directors

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