

The Salmon Enhancement and Habitat Advisory Board

Advocate for the Volunteer Community
Committed to Ensuring a Healthy Salmonid Resource.



February 17, 2005

The Honourable Geoff Regan
Minister of Fisheries and Oceans
and
Wild Salmon Policy Consultations
Policy and Economic Analysis Branch
Fisheries and Oceans Canada
200-401 Burrard St.
Vancouver, BC V6C 3S4

Dear Minister Regan,

RE: Public Consultation on the Wild Salmon Policy

The Salmon Enhancement and Habitat Advisory Board (SEHAB) provides a liaison between Fisheries and Oceans Canada (DFO) and communities and volunteers engaged in salmon restoration, stream monitoring and habitat work in urban and rural British Columbia. We understand and appreciate the links between healthy stocks, sound harvesting practices, good land use practices, monitoring and enforcement, and the need for cooperation among the various stakeholders in government, industry, First Nations and community.

Some of our members and their fellow volunteers' projects predate the Salmonid Enhancement Program (SEP) (late 1970s). SEP and the Streamkeepers Program (1994) have effectively linked communities with the salmon resource and associated decision-making processes; this community can now provide valuable information on habitat health and fish populations at a time when the Department needs a partner to help complete these important tasks.

SEHAB understands that the Wild Salmon Policy (WSP) represents a considerable change in policy regarding sustainability of wild salmon stocks, and that "A key consideration of the policy is to find the appropriate balance among social, economic and biological benefits and risks, in order to make the right decisions." (Press release Dec. 17, 2004, Minister Regan).

SEHAB has reviewed both the initial draft and the current Wild Salmon Policy (WSP) and provides the attached comments based on considerable consultation among member organizations. Our broad conclusions are, unfortunately, the same as our concerns going into the review. The protection of wild salmon through the use of the WSP will not work as long as human activity continues to degrade habitat – we need strong enforcement of habitat protection.

The Salmon Enhancement and Habitat Advisory Board

Advocate for the Volunteer Community
Committed to Ensuring a Healthy Salmonid Resource.



The Department must implement an adequate stock assessment strategy, and implement, enforce and monitor fishing quotas. It is difficult to review the effectiveness of the WSP – or any well-meaning policy - without access to adequate biological data plus accurate numbers on fish populations affected by poaching, habitat damage, spills, fish farms and other pollutants.

The strong connection between genetic diversity and the health of wild fish stocks is beyond question, but the biological and environmental needs of salmon and our watersheds should be given equal or greater emphasis. Strategic enhancement can preserve a genetic legacy and reduce the genetic and ecological hazards that wild fish and other species will otherwise face. The Department must consider this benefit – and the very real danger of continued habitat degradation - against the possibility that enhancement may create negative changes in genetic make-up.

Management decisions should balance the genetic, biological, and environmental needs of salmon and our watersheds. Please remember that the Salmonid Enhancement Program had a number of objectives, only one of which was "to augment production for harvest" (page 4).

In summary, the WSP appears to reduce the importance of wild fish to our local watersheds and to rationalize reduced financial resources rather than applying resources to improve the state of wild salmon in the Pacific Region.

Thank you for the opportunity to comment on this policy.

Yours truly

George Farrell

Chair, Salmon Enhancement and Habitat Advisory Board