

## BACKGROUND: WILD SALMON POLICY UNDER THREAT

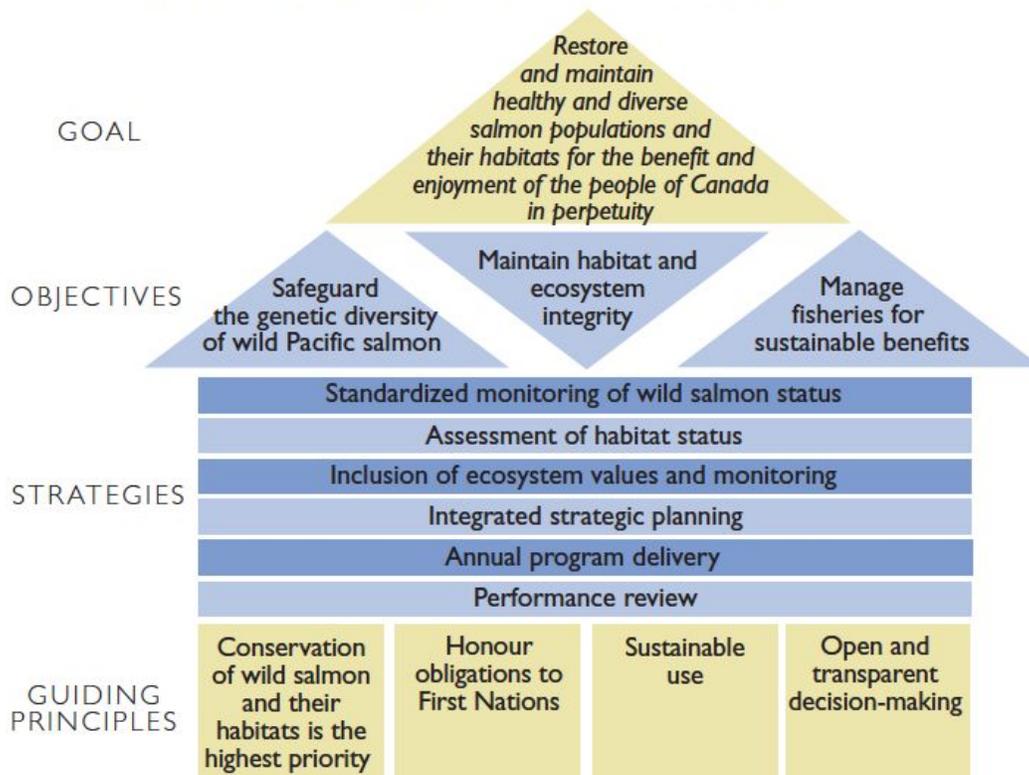
### What is *Canada's Policy for the Conservation of Wild Pacific Salmon* and why is it important?

The [2005 Wild Salmon Policy](#) is a roadmap for monitoring the status of our wild salmon runs, conserving them, and rebuilding depleted populations. It was brought in by the previous Liberal government following extensive consultations with First Nations and stakeholders. Unlike the Fisheries Act and other environmental laws, the Wild Salmon Policy was not changed or weakened by the next government.

*"[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.

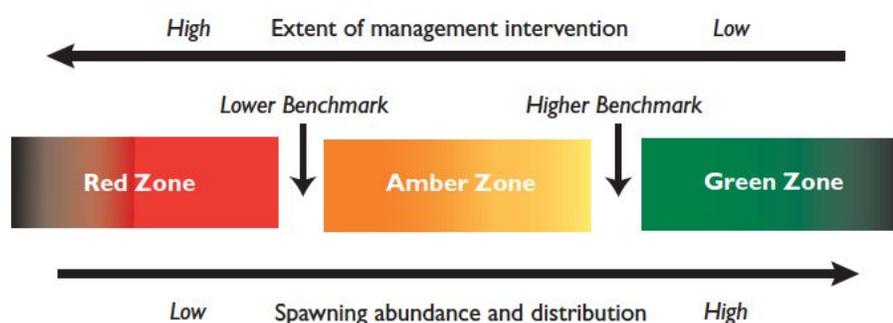
**Figure 1 Overview of the Wild Pacific Salmon Policy**



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

The Wild Salmon Policy identifies all of the “conservation units” representing the full irreplaceable diversity of Pacific salmon in Western Canada. It also assigns 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 recovery as the first priority in their management and the development of a recovery plan to bring them out of the red zone. Ultimately, the Wild Salmon Policy provides a transparent reporting mechanism letting all Canadians know how Pacific salmon are doing and ensuring DFO is held accountable to the management and protection of our salmon.

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



Although implementation of the policy has been slow, inconsistent, and plagued by a lack of political and funding support, it remains the most important and modern policy for the management of Pacific salmon in Canada. Many First Nations and stakeholders, including fishing groups, conservation groups and others, have worked together in regions across Western Canada to implement the policy, often providing extensive outside funding and science support to identify conservation units and their status. This widespread effort indicates the support for the policy, and further, changes to the policy could threaten this important work that has already been completed.

### **How is DFO proposing to “dismantle” the Wild Salmon Policy?**

The Strategies and Action steps of the Wild Salmon Policy (listed in the table below) are its greatest strength, and this is what DFO intends to remove, rewrite, and place into an “evergreen” document that could be easily changed and watered down over time.

**Table 1 WSP strategies and action steps**

- 1. Standardized monitoring of wild salmon status**
  - ♦ Identify Conservation Units
  - ♦ Develop criteria to assess CUs and identify benchmarks to represent biological status
  - ♦ Monitor and assess status of CUs
- 2. Assessment of habitat status**
  - ♦ Document habitat characteristics within CUs
  - ♦ Select indicators and develop benchmarks for habitat assessment
  - ♦ Monitor and assess habitat status
  - ♦ Establish linkages to develop an integrated data system for watershed management
- 3. Inclusion of ecosystem values and monitoring**
  - ♦ Identify indicators to monitor status of freshwater ecosystems
  - ♦ Integrate climate and ocean information into annual salmon management processes
- 4. Integrated strategic planning**
  - ♦ Implement an interim process for management of priority CUs
  - ♦ Design and implement a fully integrated strategic planning process for salmon conservation
- 5. Annual program delivery**
  - ♦ Assess the status of Conservation Units and populations
  - ♦ Plan and conduct annual fisheries
  - ♦ Plan and implement annual habitat management activities
  - ♦ Plan and implement annual enhancement activities
- 6. Performance review**
  - ♦ Conduct post-season review of annual workplans
  - ♦ Conduct regular reviews of the success of the WSP

### **Does DFO really want to “align” the Wild Salmon Policy with the previous government’s weakened Fisheries Act?**

Multiple DFO staff have stated verbally and in writing that they want to align the policy with “changed legislation”, citing the previous government’s changes to the Fisheries Act in 2012 and the resulting replacement of DFO’s Habitat Management Program with the Fisheries Protection Program. The following passage from DFO’s draft Southern BC Chinook plan from Autumn 2016 is but one example of DFO’s intention:

*"Currently, work is being undertaken by the Department to prepare a WSP Implementation Plan which will allow **alignment with changes to legislation and programs since the policy was released in 2005, such as changes to the Fisheries Act, implementation of the Fisheries Protection Program, and release of the Sustainable Fisheries Framework.**"*

The 2012 changes to the Fisheries Act and introduction of the euphemistically named Fisheries Protection Program resulted in [substantial reductions in habitat protection](#) for fish. Aligning the Wild Salmon Policy with the weakened version of the Fisheries Act seems illogical given the following examples of the current government's repeated commitments to restore the lost protections to the Act:

1. Liberal party [election platform](#) commitment:  
*"Stephen Harper's changes to the Fisheries Act, and his elimination of the Navigable Waters Protection Act, have weakened environmental protections. We will review these changes, restore lost protections, and incorporate more modern safeguards."*
2. Ministerial [mandate letter](#) commitment:  
*"...review the previous government's changes to the Fisheries and Navigable Waters Protection Acts, restore lost protections, and incorporate modern safeguards."*
3. [Public commitment in August 2016](#) by Minister LeBlanc to:  
*"...review the regressive changes made by the previous government, and restore lost protections and incorporate modern safeguards in the Fisheries Act."*
4. House of Commons [Standing Committee on Fisheries and Oceans February 2017 report](#), based on extensive consultations over the past year, recommending reinstatement of lost habitat protections in the Fisheries Act.

**The recommendations from the Cohen Inquiry and the Gardner-Pinfold report are cited by DFO as reasons for rewriting the Wild Salmon Policy. Did these reports actually recommend rewriting the policy?**

No. Neither report recommends removing the Strategies and Action Steps from the policy as part of developing an implementation plan.

The *Cohen Commission of Inquiry in the the Decline of Sockeye Salmon in the Fraser River* 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 BC's wild

salmon. The current government committed in their election platform and the Fisheries Minister's mandate letter to "Act on the recommendations of the Cohen Inquiry..." but [action to date has been severely lacking](#).

Several of Justice Cohen's recommendations focused on implementing the 2005 Wild Salmon Policy, including 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"*

The Gardner-Pinfold report cited by DFO also calls for the development of a formal implementation plan.

DFO has decided on their own that the Strategies and Action steps within the Wild Salmon Policy constitute an "implementation plan", even though this is clearly not what Justice Cohen or Gardner-Pinfold meant. DFO is conflating the Strategies and Action steps with the implementation plan that Justice Cohen and Gardner-Pinfold both recommended. Worse, they are planning to remove the Strategies and Action Steps from the policy and bundle them with an "evergreen" implementation plan that would change and could be easily weakened over time.

### **Is monitoring of BC's salmon runs really at an all time low?**

Yes. Every year, across BC, DFO contractors, First Nations, and others count the numbers of salmon returning to our streams and rivers so that we can monitor the long-term health of our salmon runs and predict how many fish will return in future years. Last year (2016), budgets were slashed for this monitoring, and fewer streams were monitored than ever before. Hard-working DFO contractors and First Nations were working without pay to count fish so that the health of our salmon runs wouldn't go unwatched.

A March 2017 [report from a Simon Fraser University think-tank](#) on salmon management stated:

*"There has been a dramatic erosion of monitoring of spawning salmon over the last 20 years with the total number of streams where salmon were counted on BC's North and Central Coasts having decreased by half....The on-going erosion of salmon population monitoring undermines effective science-based management. There is a pressing need to reinvest in annual monitoring of salmon streams, and there is an opportunity to collaborate with First Nations in delivering this work."*

## **DFO is consulting widely on their plan to dismantle and re-write the Wild Salmon Policy. Isn't that a good thing?**

Consultation is essential on important matters like the future of the Wild Salmon Policy. However, the aspects of the Policy that DFO is consulting on are not very important. Instead of asking important questions, like whether or not they should be rewriting and dismantling the policy at all, or which action steps or salmon runs should be a priority, they are wasting time and taxpayers' money on questions like, 'should "effective collaboration" be a standalone pillar of the revised Wild Salmon Policy or ingrained in the other pillars?'

## **Isn't developing an implementation plan for the Wild Salmon Policy a good thing?**

Yes. Many First Nations, conservation and stewardship groups, and others have put substantial effort into implementing the policy since it was introduced in 2005 and are keen to work with DFO on developing an implementation plan as recommended by Justice Cohen.

DFO's efforts to dismantle and weaken the Wild Salmon Policy are causing many groups to waste precious time defending the policy; time that would be much better spent working with DFO on the important task of implementing the policy. Moreover, the massive investment of DFO staff time in disingenuous consultations represents a massive misallocation of public resources.

## **There is strong support among First Nations, conservationists, scientists, and many others for maintaining the strength of the current policy and there is great concern that Fisheries and Oceans Canada will ultimately weaken the policy.**

Conservation groups, First Nations, fishing groups, and many prominent British Columbians, including two former Fisheries Ministers, have called on the Trudeau government to fully implement the Cohen recommendations and the 2005 Wild Salmon Policy.

The [Simon Fraser University report](#) cited above also supports this stance:

*"Further reviewing, reexamining, or reopening of the [Wild Salmon] policy would be a poor use of limited funds in the Pacific Region. The Wild Salmon Policy is more timely and important than ever and it should be fully implemented immediately."*

*This backgrounder was prepared by Watershed Watch Salmon Society and the David Suzuki Foundation. Questions and concerns can be directed to [salmon@watershedwatch.ca](mailto:salmon@watershedwatch.ca).*