



**Request to the
Federal Parliamentary Standing Committee on Fisheries and Oceans (FOPO)
regarding
Interior Fraser Steelhead, Species At Risk Act and Marine Stewardship Council
Certification**

**Al Martin
Director Strategic Initiatives
March 20, 2018
Victoria, BC**

On behalf of its 40,000 plus members, The BC Wildlife Federation welcomes this opportunity to write the Standing Committee Fisheries and Oceans on vital issues that relates to sustainability of fish stocks in British Columbia.

The BC Wildlife Federation (BCWF) is the oldest and largest conservation organization in British Columbia. The BCWF promotes the conservation and wise use of British Columbia's fish, wildlife and their habitats. We collaborate with a variety of other conservation organizations on issues related to watershed and fish sustainability.

On Feb 13, 2018 the Committee on the Status of Endangered Wildlife In Canada (COSEWIC) announced its recommendation stemming from the emergency review of the status of Interior Fraser Steelhead. Thompson and Chilcotin steelhead have been assessed as endangered (i.e. they face imminent threat of extirpation) and recommended for listing as such under Canada's Species At Risk Act (SARA).

The members of COSEWIC are the gold standard among scientists in this country and they operate under the law of the land. The Canadian public can have the utmost confidence its conservation interests are well served by COSEWIC.

The COSEWIC recommendation for an emergency listing as "endangered" now rests with Canada's Minister of Environment and Climate Change (MEEC). The law says the Minister has 90 days to decide if there is an imminent threat and, if so, make a recommendation to the federal Cabinet to confirm the endangered listing



under SARA . The Minister must consult with DFO and form an opinion based on that consultation, as well as the COSEWIC assessment.

MECC is required to make a recommendation on a SARA listing to the federal Cabinet within 90 days of receipt of the COSEWIC report and recommendation. Cabinet *“may consider other factors (e.g., “socio-economic impacts, and anticipated stakeholder positions”)* and that input should come from other *“responsible Ministers”* in advance of the Cabinet review and listing decision. *Fisheries and Oceans Canada (DFO) is evaluating opportunities for indigenous and public consultations on the emergency listing of Interior Fraser Steelhead Trout”.*

As Highlighted by Calvin Sandborn QC and Rebecca Whitmore of the University of Victoria’s Environmental Law Clinic’s March 9th 2018 opinion-editorial in the Vancouver Sun Titled ***Respect Science and Protect our Salmon and Steelhead*** stated : *“The problem is that the federal government routinely withholds protection for endangered fish species — directly contrary to scientific advice from the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). As a general rule, Ottawa will simply not protect fish species which affect commercial fishing interests.*

They continued: “Just look at the track record. Government authorized the scientists at COSEWIC to conduct statutory assessments of endangered species in 2002. Since then, COSEWIC has concluded that 62 fish species were “at risk” — but government has only listed 12 for Species At Risk Act (SARA) protection. The government’s record on sea-going fish is particularly abysmal. “

We believe the interior Fraser Steelhead (IFS) deserve the full protection of listing under the SARA. The process proposed by DFO for reviewing Interior Steelhead is a rules-based analysis rather than an outcomes-based exercise. It does not cover the complete range of fisheries or the run timing of the returning IFS as outlined in the 2018 Integrated Fisheries Management Plans. Were the rules effective in the past in sustaining IFS? No, and they are not being materially changed to be effective in the future.

RECOMMENDATIONS

An analysis of IFS needs to be conducted independently to look at the full



range of fishing scenarios that will result in the recovery of these stocks. The analysis must:

Reflect the current abundance status of IFS

- Look at all selective and non selective fisheries and their impacts
- Use run timing estimates that include the historic range of IFS
- Deal with the uncertainty in harvests by all fisheries over time.
- Develop effective protection measures for IFS

The sustainability of these stocks deserves this level of independent and transparent analysis available for all parties to select the best approach for recovery. We note a similar review was conducted by FOPO for Atlantic Salmon.

1. The approach of DFO of not listing marine species needs to be reviewed in the light of the risk to the diversity and sustainability of salmon stocks.
2. Marine Stewardship Council Certification. Is a certification system worth participating in if it sacrifices sustainability for marketability, and allows IFS and other Fraser stocks to trend towards extinction?

There already is a cooperative network ready for government to call on to assist in delivering watershed and fisheries management objectives including: non-profit watershed groups, educational institutions, agricultural producers, industry, fisheries interests and others, alongside of Provincial, First Nations and local governments. We need to act in a timely and coordinated fashion. This appears unlikely under the current DFO approach to salmon and steelhead recovery.

Summary;

British Columbia is fortunate to have a world-renowned rich diversity of fish and wildlife resources, but it is starting to disappear. We invite the Federal government through FOPO's leadership to join us in maintaining the province's wealth through sound strategies in conserving our diverse wildlife and fish resources and providing education and awareness in conservation and the outdoors. We request that FOPO conduct a review of these three issues in a timely and expedient manner.



We look forward to working together on these three recommendations made on behalf of the membership of the BC Wildlife Federation through your committee.