



August 28th, 2019

The Honourable Doug Donaldson
Minister of Forests, Lands and Natural Resource Operations and Rural Development
PO Box 9049, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Donaldson,

Re: Directors Variation Orders 2019-31, 2019-32 and 2019-33 (Regions 2, 3 and 5 no Fishing)

Our organizations have serious concerns with the sudden and arbitrary implementation of trout closures for resident trout in the Fraser River mainstem from Mission, upstream to the confluence with the Chilcotin River.

This measure appears to have been imposed without any public consultation nor based on science, other than the selective and misapplication of the “precautionary principle”. The rationale with respect to supporting the recovery of Interior Fraser Steelhead (IFS) is not apparent or in our view justified, particularly in context with other factors influencing the recovery plan for the species.

If you have the evidence that supports this broad-brush approach, both geographically and temporally in the Fraser, please share it. This variation order was made by Victoria senior staff without any consultation with regional staff or stakeholders. We would like to see the written rationale by the Director of Fish and Fish Habitat that justifies a full closure, compared to catch and release. This incremental step has unnecessarily limited public opportunity to fish.

We recognise Minister, that you cannot provide direction to the statutory decision maker, in this case delegated to the province by the federal *Fisheries Act*. However, we can ask for these decisions to follow due process including open and transparent consultation with indigenous and non-indigenous communities, scientific assessment of the conservation benefits to IFS and the impacts on related social, cultural and economic benefits to the province. The latter three require consultation with stakeholders to assess the impacts of decisions on the fisheries.

The inland fishery is a driver for the rural economy of BC. The recreational fishery in BC generates approximately 1 billion dollars in general revenue, 325 million dollars in GDP and 8400 jobs, half of which is attributed to angling on fresh water (BC Stats 2012).

The high value-added contribution to other BC business as nearly 1/3 of the GDP (\$101 million) income generated by sportfishing arises from other activities including angling guides and charter operators, resorts and fish camps, boat rentals and marinas, retail-tackle, fuel, repairs outboard motors and boat sales, air, rail, and water transportation, hotels, motels, and campgrounds, restaurants and repeat visits from tourists from home and abroad.

Closures such as this do a great deal of harm to these activities and small business owners and participants in the fishery, residents and non-residents alike. Fisheries managers need to be aware of the consequences and be held accountable for their actions on both the conservation and sustainable use side of the equation.



Minister, we would like to arrange a meeting with you in the fall in Victoria to discuss this issue with you, on both your responsibilities for resource conservation and rural development. We see fisheries management has become increasingly an exercise in managing to zero, and not maintaining aquatic resources and the fisheries that are dependent on them.

Please contact Al Martin, Director Strategic Initiatives BC Wildlife Federation (250- 480-9694) to arrange the meeting.

Yours sincerely,

Bill Bosch, President, BC Wildlife Federation
Rod Clapton, President, BC Federation of Drift Fishers
Jesse Blake, President, BC Federation of Fly Fishers
Matt Jennings, Executive Director, BC Federation of Resort Operators
Marc Layne, Chair, Fraser Valley Angling Guides Association

Copy to:

John Allan Deputy Minister FLNRORD
Tom Ethier ADM Resource Stewardship FLNRORD
Jen Davies, Director Fish and Fish Habitat FLNRORD