



Salmon Management Plan Draft

New B The New Brunswick Salmon Council Conseil du Saumon Nouveau Brunswick
P.O. Box 533, Fredericton, NB, E5B 5A6 C.P 533, Fredericton, NB, E5B 5A6
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Maurice Mallet, Director
Aquaculture and Recreational Fisheries
Fisheries and Oceans Canada
P.O. Box 5030, 343 Université Avenue
Moncton, NB
E1C 9B6

@ malletmo@dfo-mpo.gc.ca

Dear Monsieur Mallet:

The New Brunswick Salmon Council (NBSC) would like to thank you for the opportunity to review the *draft* Integrated Management Plan for Gulf Region Atlantic Salmon. A formal, federally-led management plan for wild Atlantic salmon is long overdue.

The draft management document lays out the goals and objectives of the Federal Department of Fisheries and Oceans; describes challenges to meeting these goals; and provides a vague framework as to how goals will be achieved. While we recognize that a management plan of this nature is complex and impacts a diverse mixture of stakeholders over a broad geographic area, we must still conclude that this document falls short in several areas. It does not provide specific and measurable actions or targets for the 5-year period it portends to cover nor does it measure the performance of DFO in meeting the goals of previous planning initiatives. Successful organizations constantly assess their resources, set measurable goals and evaluate performance based on achievement of those goals. Unfortunately, this plan does none of this.

In the interest of brevity we will limit our examples to a few, which display vagueness on the part of DFO. These examples are listed below:



Section 6.0 (Management Goals & Objectives); Objective 4 states “To increase stakeholder involvement in the conduct of the management program and the decision making process...” – rather than leaving it vague, include a measurable goal to meet monthly with identified stakeholders.



Section 9.0 (Management Framework) states:

- “No index river has been designated for SMA 17 (PEI). Accordingly, DFO Science Branch will collaborate with local stakeholders to identify one...” - set

a date for the identification of a PEI index river so that it would be more likely to occur as the deadline would be measurable.

- Page 14 states “*Consistent with the guiding principle that there be transparency in the decisions pertaining to the resource, Aboriginal organizations will be encouraged to share the details of these plans with the community salmon management organizations*”. This statement is far too vague and non-committal; if all “partners” under this draft plan are to work together to preserve the resource, each partner deserves to understand the nature and contents of all agreements pertaining to wild Atlantic salmon. Also, as public monies are involved in the negotiation of fisheries agreements it should be a condition that the details of all such agreements are made available to the public immediately upon reaching an agreement. We believe the Accountability Act supports this approach.



Section 10 (Management Measures)

- Section 10.6 (page 22) – “*DFO Fisheries officers will monitor and report on fishing activities...*” - to whom, how and when?
- Section 10.9 (page 23) states “*Good communications among the various parties involved in the management of the Gulf Regions salmon resource.....Accordingly, the Gulf Region is committed to working with (paraphrase) stakeholders.*” – Good communications could be achieved by holding regular and frequent meetings with all stakeholders. The proposed “*timely and open communications*” is vague and open to interpretation.



Section 11 (Addressing Current Problems/Issues) of this plan does a commendable job identifying 18 significant issues facing the Atlantic salmon resource yet, for the most part, manages to provide only a series of weak mitigative measures to address these threats.

- Section 11.9 (p. 27) - While the management plan indicates that DFO wants to better utilize human resources through community based initiatives we suggest that a measurable initiative could be to ensure that all enforcement officers are on active duty during the duration of time that salmon are at risk from salmon poaching activities (a recurring deficiency in DFO enforcement efforts).
- Section 11.11 (page 28) – the proposed solution is to work with industry to improve forestry practices.....continued research on the impact ofroad construction. This does not address a single existing problem and there are many. We recommend that an effort be afforded to identifying existing problems and working with the landowner to have them corrected. This approach would allow future measurement of success.
- Section 11.16 (p. 31) – While this may not currently be a major issue in the Gulf Region DFO should recognize that aquaculture has the potential to have significant detrimental impacts to wild salmon populations and that prohibition, or procedures for more rigorous best-management-practices and monitoring, should be instituted. Action should also be taken to remove the DFO conflict of interest regarding the aquaculture industry – the Minister can not concentrate on

sustaining wild Atlantic Salmon while mandated to support and grow the aquaculture industry. We note that your title is “Director - Aquaculture and Recreational Fisheries”.



Appendix A describes a variety of resource allocations, how will the allocations be enforced? The most common allocation enforcement method is to issue a limited quantity of tamper proof tags, inspect anglers for these tags on any salmon killed and ensure all anglers have a tag available for application while angling. We suggest that this (or a similar) method should apply to these allocations. At any rate, there must be some mechanism to enforce any and all allocations. References to gill nets as acceptable harvesting technology should be eliminated entirely as this gear does not discriminate between large and small salmon, not to mention the nearly SARA listed striped bass and other species.

All of the proposed measures, weak or not, are mute in light of Section 12 (Financial Responsibilities) in which it is basically stated that DFO will address all or many of the issues and problems documented within the report only if there is sufficient funding available. It is unacceptable to assume that community salmon management organizations will find the necessary resources to carry out these responsibilities while leaving open the possibility that government may have difficulties obtaining adequate funding. Generally speaking, a good plan assesses the resources available and then decides which actions may be taken within the confines of the budget so that potential shortcomings of the plan can be addressed early and planned for accordingly.

In our opinion the draft plan as currently written downloads federal responsibilities to already over-worked and under-resourced community groups. Under the Federal Fisheries Act the Department of Fisheries and Oceans is legally obligated to “*retain authority and accountability for the protection and sustainable use of the fisheries resources and their habitat*”. While this document represents a first step it is by no means the product through which wild Atlantic salmon will be preserved for future generations of Canadians.

Thank you again for the opportunity to comment on this plan, we trust our input will be beneficial and are prepared to meet with you to further discuss the plan and how to improve upon it.

Yours in Conservation,



Gary Spencer, P. Eng.

President, New Brunswick Salmon Council

Finally, here are the addresses for the various pieces associated to WASCP. Thank you Todd for providing your input. I understand that other comments are forthcoming. Regards.

PS: Greg, please lead the NS circulation of the document. Janice, can you help with the circulation to the aboriginal communities?

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/home-accueil_e.htm

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/home-accueil_f.htm

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/Paper-Document_e.htm

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/Paper-Document_f.htm

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/Policy-Politique_e.htm

http://www.dfo-mpo.gc.ca/communic/fish_man/WASP-PSS/Policy-Politique_f.htm

Maurice Mallet

Directeur, Aquaculture et pêches récréatives /

Director, Aquaculture & Recreational Fisheries

PO Box/CP 5030

Moncton, NB E1C 9B6

Tel: (506) 851-3176

Fax: (506) 851-2102

malletmo@dfo-mpo.gc.ca