



Fisheries
and Oceans

Pêches
et Océans

Pacific Region
Suite 200 - 401 Burrard Street
Vancouver, B.C.
V6C 3S4

Région du Pacifique
Pièce 200 - 401 rue Burrard
Vancouver (C.-B.)
V6C 3S4

Your file *Voire référence*

Our file *Notre référence*

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Mr. Don Kowal
Executive Secretary
Pacific Salmon Commission
600-1155 Robson Street
Vancouver, BC, V6E 1B5

Dear Mr. Kowal

On behalf of Fisheries and Oceans Canada, I would like to express appreciation to Dr. Dave Hankin and the Expert Panel for their clear and thoughtful report. We acknowledge the hard work required to review and synthesize the material on this complex subject. The report suggests that we are on the verge of new technology in some areas, demonstrating the Panel's innovation and foresight.

I would like to begin by acknowledging the major findings and issues around the CWT program. For example:

- Finding 1: "the CWT system is the only technology that is currently capable of providing the data required by the PSC..."
- Finding 6: "The Panel concurs with previous ASTEC findings that Mass Marking and Mark-selective Fisheries together pose a serious threat to the integrity of the CWT recovery data systems."
- Finding 11: "Some existing technologies can complement the existing CWT system."
- And several findings that lead to Recommendation 15: "PSC technical committees should explore potential fishery management regimes that would rely less on estimates of age-fishery-specific exploitation rates..."

These findings present a serious challenge for agencies associated with the Pacific Salmon Commission (PSC). The CWT system is the only technology capable of meeting the information requirements of the current Pacific Salmon Treaty (PST) chinook and coho management regimes. Even when issues of restored capacity and co-operation are addressed, the development of mass-mark selective fisheries along with increasing demands for greater resolution of fisheries (time, area, gear strata) will augment the data limitations, uncertainty and costs for the CWT

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program. While new methodologies may complement the CWT program, the Expert Panel notes sampling limitations (e.g., the 'needle in the haystack' scenario for depressed natural populations), the extensive costs anticipated, and the need for continued methodological development.

I would also like to suggest a few issues in the report that might require further reflection. For example:

- Finding 16: the wording around AABM should be considered in light of the Pacific Salmon Treaty Annex language and the obligations that the parties made in the 1999 Agreement.
- Recommendation 12: the supporting documentation includes the Panel's conclusion that "future applications of genetic methods for salmon management should employ SNP markers". This statement appears inconsistent with the CSC report: "Where good microsatellite baselines are available, the CSC encourages their continued use in the near term and at the same time development and evaluation of SNPs for future use."
- Overall, implementation of the report will require a high level of coordination and cooperation amongst the agencies involved.

Given the complexity and magnitude of these issues, DFO intends to reflect further and to provide detailed comments on each recommendation at a later date. At the same time, I recognize the urgency expressed in the report to make changes to the CWT system and would support moving ahead in those areas where we can find an early consensus. In other areas we may need further work to understand fully the potential impacts (including the costs) around implementation of the recommendations and the suggested next steps before proceeding.

I look forward to our progress and continued collaboration on this important topic.

Sincerely,



Paul Sprout
Regional Director General
Fisheries and Oceans Canada