



To: Jackie Kean, Fisheries and Oceans Canada, St. John's
From: Don Ivany, Atlantic Salmon Federation
Date: July 24, 2017
Subject: ASF response to 2017 Atlantic Salmon Mid-season Review, Newfoundland Labrador Region

The Atlantic Salmon Federation has reviewed the Atlantic salmon mid-season review for Newfoundland and Labrador (CSAS Science Response 2017/36). Based on the data and analysis provided, we have significant concerns about the current status of salmon populations in NL.

Based on counting facility returns up to July 16th, it appears returns to Newfoundland rivers will be down by an average of 53% over the previous 5-year average, with 2016 returns having been down approximately 40% over the previous 5-year average. Consequently, it is likely that few rivers on the island will meet their minimum conservation requirements again this year, putting the future of the resource and the social and economic benefits derived from it in jeopardy.

This unexpected and alarming decline requires immediate precautionary action. Consequently, ASF makes the following recommendations:

- 1. DFO Management immediately accept and implement the advice of DFO Science that all rivers on the island be closed to retention angling until there is evidence of improved returns, and that catch-and-release angling be permitted to promote angler engagement and continued stewardship.**
- 2. If returns to index rivers in southern Labrador have not improved significantly by July 23rd, all Labrador rivers south of Cartwright be included in the closures.**
- 3. DFO increase inland enforcement levels for the remainder of the 2017 season, including an extension of the Inland Fishery Guardian program until mid-October to better protect and maximize spawning from the salmon that make it into the rivers.**

In support of these recommendations, ASF would like to make the following points:

- DFO has legislative authority towards the conservation of wild Atlantic salmon. DFO's approach for conservation is articulated in Canada's Policy for the Conservation of Wild Atlantic Salmon which states "*Conservation of wild Atlantic salmon, their genetic diversity and their habitats is the highest priority in resource management decision making.*" The steps recommended above are therefore consistent with DFO's responsibility, authority, and stated policy for salmon conservation.
- DFO Science recommends - on an on-going basis - that there should be no harvest from populations not meeting their minimum spawning requirements.

- Given that many rivers will not likely meet their minimum spawning requirements, it is imperative that as many remaining salmon as possible reach the spawning grounds. Given the likelihood that the majority of most runs are now in the rivers, the only options available to achieve this are to reduce angler harvest (Recommendations 1 and 2), and reduce poaching (Recommendation 3).
- Regarding Recommendation 2 above, ASF has expressed concerns about the status of southern Labrador rivers at the SAC for a number of years. Rivers in SFA 2 have not consistently met their conservation requirements in recent years, and anecdotal reports suggest that rivers in SFA14b are showing similar patterns. We note the following concern expressed by Science in the CSAS document *“If rivers remain open to retention in Salmon Fishing Areas (SFAs) where monitored rivers are expected to achieve conservation (e.g. SFA 14A), research suggests that anglers will shift their effort to these rivers (Veinott et al. 2013), thereby possibly subjecting them to overexploitation.”* ASF extends this concern to rivers in southern Labrador, particularly those that are easily accessible and those that have a season limit of 4 fish (i.e., Unclassified rivers).
- Reducing angler harvest has implications beyond NL and beyond this year. 2018 is a negotiation year at NASCO for the Greenland fishery. As in the past, Canada will pressure Greenland to make further reductions to their fishery which targets non-maturing MSW fish of largely Canadian origin. If Canada does nothing to curtail its harvest this year in the face of significant declines and decreasing likelihood of NL rivers meeting minimum conservation limits, this lack of leadership will be noticed by Greenland and will provide them with significant rationale for continuing to fish at unsustainable levels.
- Members of the SAC may not reach consensus on the recommendations put forward by DFO Science. Some SAC members will likely continue to argue for retention in the face of the scientific evidence and advice. Lack of consensus cannot be used as a reason for failing to implement necessary precautionary measures to meet DFO’s legislative responsibility and stated policy. As noted above, ASF’s recommendations are consistent with DFO’s responsibility, authority, and policy for the conservation and wise management of wild Atlantic salmon.