



VISION

That sturgeon populations in the Fraser River are strong, healthy, and sustainable for future generations

March 4, 2005

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RE: POSITION OF THE FRSCS REGARDING THE DECISION TO LIST WHITE STURGEON IN CANADA AS AN ENDANGERED SPECIES UNDER SARA

*This submission to SARA is being put forth by the Fraser River Sturgeon Conservation Society (FRSCS) as an attachment to the Consultation Workbook for Legal Listing of Aquatic Species. **Attachment 1** provides an introduction and background information for the FRSCS.*

1. The FRSCS supports the intentions of SARA to:

- provide legal protection for wildlife species in Canada;
- conserve and protect biological diversity in Canada; and
- secure the necessary actions to recover species at risk.

The FRSCS understands that the delivery of the intentions set forth by SARA will be based on principles of inclusiveness, cooperation, stewardship, partnerships, and collaborative involvement, and that all delivery components will be transparent.

The FRSCS understands that defined stocks within a species designated as endangered, if identified in a recovery plan, can be considered by COSEWIC for a designation change separate and apart from other defined stocks of the same species. Thus, if all six stocks of white sturgeon are designated as endangered by SARA, any one of the six identified stocks may be considered for a designation change. This potential change (i.e., uplisting) would follow a submission process (to COSEWIC) and the acceptance of applicable information, and that subsequent designation changes will apply on a stock-specific or recovery plan-specific basis and will not necessarily change the designation of other stocks.

- ### **2. The FRSCS recommends that SARA adopts the COSEWIC recommendation (November 2003) and designates white sturgeon in Canada as an endangered species under SARA.** This recommendation is based on the status and vulnerability of white sturgeon populations and habitats for all six stocks of white sturgeon in Canada.

If SARA designates white sturgeon in Canada as endangered, the FRSCS expects SARA to:

- collaborate with the FRSCS and others toward the delivery of a credible recovery planning process for each of the 6 stocks; and
- support effective and efficient actions toward the conservation, protection, and stock rebuilding of white sturgeon on a stock-specific basis, based on the recommendations of respective recovery plans.

The FRSCS expects that recovery plans for white sturgeon will include, but are not limited to, the following list of components, each of which requires program implementation and support:

- monitoring and assessment of population status and recovery trends;
- specific research regarding biology, ecology, life history, and eco-relationships, including the status and availability of stock-specific food sources;
- critical habitat identification and protection;
- enhanced monitoring and enforcement of illegal harvest;
- monitoring and assessment of water quality and pollution impacts; and
- for the three Fraser River stocks, credible assessments and effective action plans to reduce mortality and injury rates in all fisheries (commercial, recreational, aboriginal, and illegal).

3. The FRSCS recommends that SARA maintains the current non-retention recreational fishery in the lower Fraser River.

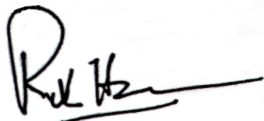
The FRSCS recognizes that the non-retention recreational fishery for white sturgeon in the lower Fraser River has been essential, and will continue to be integral, to population monitoring and assessment of that stock. Results from the FRSCS' Lower Fraser River White Sturgeon Monitoring and Assessment Program, which derives almost 80% of its data from the recreational fishery, were central to the credible analyses that allowed COSEWIC to put forth the decision to designate the lower Fraser River stock as endangered. The recreational fishery is primary to the delivery of this established, essential stock monitoring program that will be required as part of the white sturgeon recovery plan for the lower Fraser River.

If SARA adopts the endangered designation for white sturgeon in Canada, the FRSCS strongly recommends that the recreational fishery in the lower Fraser River is recognized for its primary contribution to stock monitoring and assessment requirements, and that a provision is provided by SARA to allow the continuation of this fishery. This recommendation is based on:

- the significant value and high utility of stock monitoring and assessment information provided by the recreational fishery;
- strong indications that activities associated with the non-retention recreational fishery do not restrict or impact sturgeon stock rebuilding potential;
- the timely delivery of a detailed, critical assessment of the mortality and injury levels associated with the non-retention recreational fishery;
- the strong resource stewardship elements provided by the recreational fishery, which in turn provide significant benefits toward white sturgeon conservation and protection; and
- the high successes achieved by the FRSCS toward white sturgeon conservation initiatives through education and awareness provided by the recreational fishery, and a key strategy to use the recreational fishery to marshal the necessary leadership and financial resources to support and deliver key initiatives put forth in the recovery plan.

On behalf of the Directors of the FRSCS, I thank you for your consideration of this important matter.

Yours truly,



Rick Hansen, Chair, Fraser River Sturgeon Conservation Society