



January 24, 2022

To: Minister Steven Guilbeault, Environment and Climate Change Canada,
To: Minister Joyce Murray, Fisheries and Oceans Canada,
By email: ec.ministre-minister.ec@canada.ca, min@dfp-mpo.gc.ca

Re: Listing of endangered Interior Fraser Steelhead under the Species at Risk Act

Dear Ministers,

We are writing to you as fishery advocates on behalf of a group of fish known by the science community as Interior Fraser Steelhead (IFS). These unique fish are comprised of steelhead trout from the Chilcotin and Thompson Rivers and have been on a precipitous decline in abundance for the past decade. The IFS group is dominated by fish from the Thompson River, arguably once the most revered groups of steelhead trout in British Columbia and beyond.

The status of the IFS was reviewed by Canada's Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which recommended an emergency listing as Endangered under Canada's *Species at Risk Act (SARA)* in February 2018. During listing consultations organized by the federal government, the COSEWIC recommendation was considered in combination with a recovery potential assessment (which was altered without permission of all participants) and a non-independently reviewed socio-economic analysis. These contributions resulted in the ultimate authority, the Minister of Environment and Climate Change, issuing a decision that IFS should not be afforded SARA protection. Instead, the federal and provincial fisheries management agencies developed a plan that promised to address and reverse the IFS decline.

Three years after the initial COSEWIC assessment in 2018, the status of IFS has only declined further. In the meantime, a second, more extensive review by COSEWIC resulted in another recommendation to list IFS as Endangered under SARA (November 2020). That recommendation awaits adjudication by the newly appointed federal government's cabinet ministers with a timeline that is indefinite. This autumn saw IFS exhibit the lowest estimated spawning population size since records began 40-50 years ago – an average of fewer than 15 fish per tributary – far lower population sizes than those that resulted in the two COSEWIC recommendations for SARA listing as Endangered.

The IFS situation is the most severe conservation crisis for any wild sea-run fish in British Columbia. It commands immediate action to forestall the loss of these iconic fish. We, the undersigned, implore you to take the only immediate action available to prevent this outcome: list Interior Fraser Steelhead as Endangered under SARA's Schedule 1 on the basis that there is an imminent threat to their survival and proceed immediately with a recovery strategy and action plan.

Unfortunately, "integrated plans" under Canada's *Fisheries Act*, (which are not designed to recover fish populations at risk of extinction) have failed to stop the decline and recover IFS.

We respectfully ask that you chart a bold and necessary new course for conservation of Interior Fraser Steelhead and use the key legislative tool, Canada's *Species At Risk Act*, that was *specifically designed* to protect and recover Canada's species at risk of extinction, of which these fish are among the most dire examples.

Sincerely,

Eric B. Taylor, Professor, Department of Zoology, UBC and former Chair, COSEWIC (2015-2018)

Myles Armstead, President, BC Fly Fishers Federation

Brian Braidwood, President, Steelhead Society of BC

Dave Moskowitz, Executive Director, The Conservation Angler

Rich Simms, Director, Wild Steelhead Coalition

Louise Pedersen, Executive Director, Outdoor Recreation Council of BC

Aaron Hill, Executive Director, Watershed Watch Salmon Society

Greg Knox, Executive Director, SkeenaWild Conservation Trust

Kurt Beardslee, Executive Director, Wild Fish Conservancy

Misty MacDuffee, Wild Salmon Program Director, Raincoast Conservation Foundation

Karen Wristen, Executive Director, Living Oceans Society

Trout Unlimited Canada, Lesley Peterson, Alberta Biologist

Len Piggin, President, Kamloops Fly Fishers Association

Gauri Sreenivasan, Director of Policy and Campaigns, Nature Canada

Jesse Zeman, Executive Director, BC Wildlife Federation

c.c.

Hon. George Heyman, Minister Environment and Climate Change Strategy, Province of BC

Hon. Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations and Rural Development, Province of BC

Fin Donnelly, Parliamentary Secretary for Fisheries and Aquaculture, Province of BC