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Elizabeth May

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Fisheries and Oceans Canada c/o Marc Clemens

Via email: DFO.Rebuilding-Retablissement.MPO@dfo-mpo.gc.ca

Re: Proposed regulation on rebuilding plans: feedback

February 15, 2019

Thank you for this opportunity to provide the Department of Fisheries and Oceans with comments on the proposed elements of a regulation to list major fish stocks and to describe requirements for fish stock rebuilding plans. As the Member of Parliament for a riding where fish and fisheries are top of mind, I value the department's openness to feedback.

I was delighted to see the government deliver on its commitment to restore protections to fish habitats across the country in Bill C-68. The legislation restored the value of fish and fish habitats, and moves towards a sustainable way of managing this vital part of our environment.

That said, I would like to emphatically support the recommendations made by Oceana and Ocean's North in their Review and Recommendations for Fisheries Rebuilding Regulations Under Canada's Modernized Fisheries Act from December 2018, as well as both of those organizations' submissions to this same consultation.

The proposed contents of rebuilding plans make no mention of climate change, or of the climate vulnerability of depleted species. Recent research has shown that evolving environmental change may make recovery targets "moving targets" and affect the stability and predictability of fisheries in general.ⁱ Similarly, scientists found that rebuilding plans that are made without the underlying assumptions of climate variability may not be attainable.ⁱⁱ



My constituents are deeply concerned about the Chinook Salmon population (and, of course, the impacts of their population on that of the Southern Resident Killer Whales). I am glad to see that the species is listed as part of Batch 1. However, as pointed out in the recommendations by Oceana Canada and Oceans North, populations with a COSEWIC designation without a listing decision should also be prioritized under the major stocks list in Batch 1.

Thank you again for this opportunity to provide feedback.

Best regards,

A handwritten signature in black ink, reading "Elizabeth May". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Elizabeth May, O.C.
Member of Parliament
Saanich-Gulf Islands
Leader of the Green Party of Canada

ⁱ Britten, G. L., Dowd, M., Canary, L., & Worm, B. (2017). Extended fisheries recovery timelines in a changing environment. *Nature communications*, 8, 15325.

ⁱⁱ Bell, R. J., Wood, A., Hare, J., Richardson, D., Manderson, J., & Miller, T. (2017). Rebuilding in the face of climate change. *Canadian Journal of Fisheries and Aquatic Sciences*, (999), 1-10.

