

Monday, September 21, 2026

Tola Cooper

Regional Manager, Pacific Region Species at Risk Program
Fisheries and Oceans Canada
200-401 Burrard Street
Vancouver, BC V6C 3S4

Via email: DFO.PACSAR-LEPPAC.MPO@dfo-mpo.gc.ca

Re: Potential listing of twelve Fraser River Sockeye Salmon Designatable Units under the Species at Risk Act

Dear Ms. Cooper,

On behalf of BC Nature, Federation of BC Naturalists, a province-wide naturalist organization representing more than 7,000 members through 64 member clubs across British Columbia, we are writing in response to Fisheries and Oceans Canada's consultation regarding the potential listing of twelve Fraser River Sockeye Salmon (*Oncorhynchus nerka*) Designatable Units (DUs) under the federal *Species at Risk Act* (SARA).

BC Nature has a long-standing interest in the conservation of British Columbia's native species, habitats and ecosystems, and we appreciate the opportunity to provide input.

The twelve DUs under consideration have been assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as either **Endangered** or **Threatened**. Ten are assessed as Endangered, while North Barriere-ES and Widgeon (River-Type) are assessed as Threatened.

BC Nature supports listing all twelve Fraser River Sockeye Salmon Designatable Units under SARA in accordance with their COSEWIC assessments.

BC Nature is not aware of new information that would warrant referring any of the twelve DUs back to COSEWIC, nor do we see a conservation basis for declining to list populations independently assessed as Endangered or Threatened.

These populations represent distinct components of Fraser River Sockeye Salmon diversity. Differences in spawning location, migration timing and life-history strategies contribute to the resilience of the species as a whole.

DFO identifies multiple pressures affecting these populations, including climate change and severe weather, fisheries, ecosystem modification, landslides and, for some populations, mortality during return migration. These pressures can interact across multiple stages of the salmon life cycle.

BC Nature believes conservation and recovery measures must extend beyond harvest management. Sockeye Salmon depend on connected freshwater, riparian, estuarine and marine ecosystems, and recovery will require protection of the habitats and ecological processes that support them.

If the twelve DUs are listed under SARA, BC Nature recommends that recovery strategies and action plans:

- protect and restore critical spawning, rearing, migration, riparian and estuarine habitat;
- maintain water quality, adequate stream flows and climate-resilient habitat conditions;
- reduce cumulative habitat degradation and ecosystem impacts;
- eliminate, to the extent possible, fisheries impact on these particularly vulnerable populations;
- set measurable recovery targets, timelines and long-term monitoring; and
- use the best available science, Indigenous Knowledge and community-based monitoring.

SARA listing would require recovery strategies and identification and protection of critical habitat. BC Nature considers these measures especially important given the broad distribution of the twelve populations and the range of ecosystems they depend on.

Should any DU not be listed under SARA, BC Nature believes strong conservation measures should still be provided under the *Fisheries Act*, including habitat protection, monitoring and actions addressing identified threats.

For these reasons, **BC Nature recommends that Fisheries and Oceans Canada advance the listing of all twelve Designatable Units as assessed by COSEWIC.**

A BC Nature backgrounder summarizing the conservation, ecological, cultural, geographic and scientific context for these proposed listings is included with this submission. Thank you for the opportunity to participate in this consultation. We would be pleased to provide additional information or participate in further discussion.

Sincerely,



Harold Sellers
President

BC Nature – Federation of BC Naturalists

Enclosure: BC Nature Backgrounder – Potential SARA Listing of 12 Fraser River Sockeye Salmon Designatable Units