

SAVE MIRAMICHI SALMON INC.



Sauvons les saumon de la Miramichi / Plamu 1st

Submission to the House of Commons Fisheries and Oceans Committee [FOPO – Fisheries and Oceans Pêches et Océans]

The following document is a summary of the submission made to FOPO to support a request from Save Miramichi Salmon Inc [SMS] for a further examination (study) of the status and management by DFO of southern Gulf of St Lawrence Striped bass stocks and their impact on other species primarily Atlantic salmon, but also potentially on sea run brook trout and rainbow smelt.

SMS's full submission can be found at <https://savemiramichisalmon.com/>

SMS Request to FOPO:

In addition to the study requested, our submission also calls for the creation by FOPO of a subcommittee to maximize the outcomes of the study and the chances of DFO's managing in accordance with the committee's directives and recommendations, this justified by DFO's inaction with respect to previous FOPO recommendations made in 2019.

Request to Stakeholders

SMS would ask you to review our submission and to support our effort by:

1. corresponding with the committee to support our request by sending comments to:

Maxime Ricard, Clerk of the Committee
Standing Committee on Fisheries and Oceans
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada
E-mail: FOPO@parl.gc.ca; and

2. Communicate to committee members and local MPs to seek their support for FOPO to take up this matter. [See attached list of FOPO committee members and New Brunswick MPs].
3. Consider submitting a brief and appearing before the committee to present evidence if they do undertake a study as requested by SMS

Summary of Request for Study on Fisheries Management

Save Miramichi Salmon Inc. (SMS), a not-for-profit organization focused on protecting Atlantic salmon in the Miramichi River, urges the Standing Committee on Fisheries and Oceans to investigate Fisheries and Oceans Canada's (DFO's) management of Atlantic salmon and striped bass in the Miramichi River.



- SMS position is that DFO is neglecting its scientific and management responsibilities, leading to the imminent extirpation of Atlantic salmon in the greater Miramichi River drainage (the Miramichi).
- Scientific and anecdotal evidence indicates striped bass are preying on Atlantic salmon at rates that will soon make the continued existence of Miramichi salmon unsustainable.
- DFO has evaded previous recommendations from FOPO regarding management of striped bass and for an eco-balanced fish community on the Miramichi.
- SMS highlights a lack of reliable science and accountability from DFO.

Minister's Legal Duties and Responsibilities

The Minister of Fisheries has a constitutional obligation to protect and conserve Canada's fisheries for future generations

- The Constitution Act, 1867 empowers Parliament to regulate and protect fisheries.
- The Minister must prioritize conservation over management discretion.
- The precautionary principle mandates that DFO must act to prevent environmental harm even in the face of scientific uncertainty.
- The Minister's failure to prevent the extinction of Atlantic salmon contradicts her legal duties.

Decline of Atlantic Salmon in the Miramichi

- The Miramichi Atlantic salmon population has drastically declined in reverse correlation with the growth of Striped bass stocks
- This is a cause-and-effect relationship that threatens the salmon's survival within the drainage basin.
- The Miramichi salmon population decreased by 93% from 2011 to 2024, with only 5,315 adult salmon returning in 2024.
- DFO's 2025 recovery plan is deemed insufficient, as it projects a 12-year recovery period while the salmon population will not survive that long.
- Urgent intervention is necessary to prevent total collapse.

Striped Bass Population Explosion

- The striped bass population in the Miramichi has surged, negatively impacting Atlantic salmon.
- DFO's management led to a population increase from fewer than 5,000 in the 1990s to over 500,000 in 2023.
- The limit reference point (the point below which the population is at risk) for striped bass is set at 330,000, which is deemed excessive and scientifically unjustified.
- The increase in striped bass has coincided with the decline of Atlantic salmon and other species like rainbow smelt.



Evidence of Striped Bass Impact on Salmon

- Research indicates striped bass are significantly contributing to the decline of Atlantic salmon in the Miramichi.
- Studies show that 95% of tagged salmon smolts do not survive estuary passage, largely due to predation by striped bass.
- The survival rate of smolts has plummeted from 60-70% (2003-2008) to only 5-10% in recent years.
- Comparative rivers without substantial striped bass populations have a smolt survival rate of approximately 90%.

Flawed Science and DFO's Inaction

- DFO relies on outdated and flawed science to justify inaction regarding the striped bass and Atlantic salmon crisis.
- DFO dismisses their own evidence linking striped bass predation to salmon decline, attributing the issue to other factors.
- The department used 9+-year old data to question that striped bass are having a population-level effect on Miramichi salmon during their migration through the estuary, while ignoring more recent data that strengthen to the point of statistical significance the correlation between striped bass numbers and salmon mortality.
- DFO used a contrived analysis to further question the significant link between striped bass numbers and estuary-based salmon mortality, while ignoring conventionally-collected data that exposes their flawed methodology.



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Would you like the next batch of MPs or a downloadable version?