

**Comments and
Background Observations
on the Management of
Miramichi
Atlantic Salmon**

Submitted by:

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My Background

- For 38 years, I have owned and operated the W. W. Doak tackle shop and mail order company. Founded by my father in 1946, we are a family business spanning 3 generations and we employ 4 people on a full time, year round basis. As a result, I have spent most of my life in regular contact and conversation with salmon anglers from every part of North America.

- In 1981, I was appointed to the Miramichi Salmon Association board of directors and served in this capacity until my resignation in 1996.

- In 1983, as a member of both the N. B. Council of the Atlantic Salmon Federation and the N. B. Outfitters Association Salmon Committee, I was actively involved with efforts to remove the commercial nets from the Miramichi estuary and the subsequent introduction of hook and release angling for all MSW salmon in 1984.

- I have represented the Miramichi Salmon Association in several inter-provincial meetings of the Atlantic Salmon Board in the late '80s and early '90s.

- In 1991, I worked closely with the N. B. Outfitters Association in crafting a strategic response to the Supreme Court of Canada's Sparrow decision.

- I have represented the N. B. Guides Association and served as a director of the Miramichi Watershed Management Committee for over a decade.

My Bias

- I am committed to the concept of a well managed, balanced fishery that both engages the support of local anglers and enhances the experience of all who visit the Miramichi.

- I am confident that the Miramichi can continue to be one of the finest Atlantic salmon rivers in the world, offering a wide range of fishing opportunities for anglers from all walks of life. I disagree with those who are quick to declare its demise while reaping the "profits of doom".

- I am convinced that selective harvest management practices are the most practical and sustainable approach to all our natural resources. Over many years of man's abusive husbandry, nature has been subjected to periods of exploitation, often followed by compensatory worship, i.e. clearcuts and parks. I favour a more even handed, less extreme approach.

- I consider selective harvest angling not as a peril from which the salmon must be protected, nor do I see it as the purpose for which the salmon must be protected, but rather as the only process through which the salmon will be protected. Responsible angling is the epitome of practical conservation. It provides both the initiative and the incentive to protect a renewable resource and it ensures an intense, widespread commitment to the overall health of the river system.

- I contend that because Atlantic salmon are not actively feeding in freshwater, it is virtually impossible for fly fishing for grilse to have any real negative impact upon the survival of the resource. There simply is no irresistible fly pattern or hatch matching technique which will entice an unresponsive salmon. Attempts to restrict or eliminate angling sometimes lose sight of this key distinction between Atlantic salmon and brook trout management strategies.

My Concerns

1) Salmon conservation has become a very big industry, generating millions of tax free dollars, most of it coming from wealthy contributors who only occasionally visit the Miramichi.

As a result, policies and priorities are being advanced by those with limited understanding of practical salmon management. From articles in Forbes magazine to letters from Exxon lawyers, this attempted gentrification of the Miramichi valley has resulted in calls from people who do not live here to radically transform the traditional angling practices of those who do.

Not surprisingly, when a poll asked Miramichi residents in 2014 if their concerns were adequately represented by conservation groups, the answer was an overwhelming no.

a) Years of friendship and interaction with most of the key players in the conservation movement have given me some insight into their vision for our river.

b) Many “conservationists” believe that the best thing for the Miramichi would be to reduce the number of resident anglers. This trend has been developing since the mid 1990s, and while some are quite blunt and disrespectful in their opinions, others are more subtle.

1) In a book published in 1996 with assistance from JD Irving Ltd., author Phillip Lee quotes a gentleman who later became president of the MSA as saying “There isn’t room enough for everybody who wants to go salmon fishing. And I don’t know where you draw the dividing line unless it’s the people who can afford to pay their way.”

2) In a speech given in Boston in Feb. 1998, another MSA president discussed the use of “peer pressure” to effect a change in Miramichi angling behaviour. Since then, we have watched this strategy develop into a “shaming” of those who choose to retain a grilse.

3) In our store, we have heard personally two other former MSA presidents refer to local anglers wishing to keep a grilse as “meat men”, saying the sooner they are off the river, the better.

4) In an editorial in the fall of 2000, the Telegraph Journal called for a license lottery for salmon anglers, in an admitted effort to significantly reduce the number of fishermen.

c) Support for mandatory release has also come from some who conduct guiding and outfitting businesses on crown open water, for whom the absence of local anglers would be a direct benefit.

d) In the post war era, a strong, independent, locally owned outfitting infrastructure provided the impetus for integrated, practical salmon management policies. In recent years, independent outfitters have all but disappeared and private fishing clubs have become the primary economic force in Miramichi angling, often with a more narrow and divisive perspective.

2) Many of the claims of conservationists go unchallenged by a media and a public that have little interest in a deeper consideration of the facts.

a) When leaders begin to “believe their own press”, exaggerated pronouncements can be made with no real basis in science. Consider last September’s MSA declaration that we had only 12,000 salmon in the Miramichi or the assertion by the ASF on CBC’s “As it Happens” that we could expect, at best, 10% more fish to enter the river before freeze up. Both claims were premature, unfounded and later proven to be woefully inaccurate.

b) The reputation of the Miramichi as North America's premier producer of Atlantic salmon has been permanently tainted by rhetorical excess. This has put the fishery on edge and continues to drive many away from the river.

c) Efforts to shrink the resident sector of the fishery have targeted traditional selective angling practices for legislative curtailment. Public opinion has been easily swayed and from editorials to internet postings, anglers are often portrayed as a problem instead of a protection. This ignores the long history of a conservation ethic deeply rooted in the angling fishery.

d) Many people who readily agree that angling alone is not sufficient to curtail the striped bass population still insist that fly fishing for grilse is a serious threat to salmon stocks. This opinion is widely held even though salmon anglers use small artificial flies while fishing over well dispersed, non-feeding salmon. In stark contrast, bass anglers use large lures and bait in pursuit of high concentrations of voraciously feeding, aggressive fish.

3) The conservation industry has become preoccupied with a “no kill” grilse policy instead of one of wise use and acceptable risk.

Despite the absence of any real evidence of efficacy, this has become the new and seemingly, the only solution. As the saying goes “When all you have is a hammer, everything starts to look like a nail”. While we all agree that zero harvest of MSW salmon makes perfect biological sense, this new “grilse fixation” appears to be rooted more in an ideology which disregards some key considerations.

a) Some simply seek to set a good example for other users but this has been done for 30 years, without much reciprocation. The leadership shown by Miramichi anglers over the past three decades proves the adage “if you are too far out in front, you will be mistaken for the enemy”.

b) Some proponents of mandatory grilse release cite the Greenland fishery as a justification. However, since grilse don't migrate to Greenland, isn't this a bit like a cattle rustler telling a rancher to stop eating pork? The closure of the Greenland salmon fishery is understood to require great consideration, consultation and compensation for its participants. By contrast, many who advocate closing the Miramichi grilse fishery often do so without a passing thought to its impact upon local residents.

c) Some anglers overlook or simply don't know that the vast majority of Miramichi grilse are male. While they may return as a larger fish in future migrations, their potential contribution to egg deposition is still minimal at best. The early run Northwest Miramichi grilse component is the clear exception to this and merits protection by river specific, monthly adjusted, universally applied harvest restrictions.

d) Frequent predictions of salmon abundance for an upcoming year based upon grilse abundance of the previous year have been misunderstood by people as being a conditional correlation rather than a coincidental one.

e) The imposition of “no kill” angling on the Miramichi will not result in “zero harvest” of fish. It will, instead, lead a few local anglers to break the law, which will immediately threaten the egg bearing Multi Sea Winter component of the resource. The reality is, given the visceral connection many residents feel with the river, some fish will be harvested regardless of any law. I have heard several biologists say its better to loose 15 grilse to save one salmon. Lets not be penny wise and pound foolish.

f) The presence of compliant, engaged, observant and astute resident anglers on the Miramichi river is essential to the proper management of this resource. They both detect and deter infractions from poachers and from environmental abusers. With mandatory grilse release, many Miramichiers will simply stop fishing, leaving a dangerous vacuum on the river.

g) Some biologists hold that a disproportionately high ratio of grilse on the spawning beds may actually be detrimental to future MSW salmon production. In the early 1990s, the MSA actually proposed an increase in the angling harvest of grilse from the Miramichi to “thin the herd” and boost spawning efficiency. As the ASF’s Dr. Wilfred Carter used to say, “grilse beget grilse”.

h) Several years of mandatory grilse release on the Northwest and Little Southwest Miramichi have not yet been shown scientifically to have contributed to increased egg deposition. In the absence of any other meaningful corrective measures, this approach will continue to be of little or no value in the resuscitation of these rivers.

4) Salmon anglers have been led to believe that if they encounter a few days of slow fishing, it is because there is something wrong with the resource which only their donations will be able to fix. Numerous examples of this exist in the public record.

a) Periods of slow fishing have always been a factor in salmon fishing, and it is for this very reason that the sport holds such a fascination for dedicated anglers. It is, by design, a slow and patient pursuit, unlike almost anything else in modern society.

b) Nature is cyclical and historical oscillations of salmon populations are part of the reality of the fishery. When we expect nature to perform for our entertainment, we often find ourselves at odds with this reality.

c) During the resurgence of the fishery in the late 1980s and early 1990s, many stretches of water were purchased at high prices by people with great expectations. When runs are strong, mediocre pools are productive, but in lean years, they are less so, as salmon tend to populate premium pools first. The health of the river is often misjudged by those whose expectations for their stretch of water is not born out by history.

d) For some people, everything in life is a score and competitive “trophy” angling has become an increasing problem in today’s salmon fishery. Those who occasionally take home a grilse for the dinner table are often more easily contented than those who count, compare, click, catalogue and cradle their catch, only to release and immediately try for a larger one. In short, the appetite for food is more readily satisfied than the appetite for entertainment. Perhaps that’s why we pay our farmers so little and our actors so much.

5) Assumptions of constant historical stock abundance are based on a selective recollection of the facts.

a) The need for conservation is nothing new. One newspaper headline in the 1950s bemoaned the demise of the Miramichi salmon resource and that decade’s concern for salmon stocks led to the formation of the MSA.

b) In the 1960’s the Miramichi was effectively becoming known as a “grilse river”, with the majority of large summer fish being harvested commercially in the estuary. Many outfitters at the time derived their revenue primarily from the spring kelt fishery and the fall salmon runs with very few salmon being present throughout the summer months.

c) In 1972 Minister Jack Davis closed the commercial fishery in Miramichi bay with full compensation for its participants. Regrettably, a commercial by-catch was allowed to flourish during that time and large numbers of salmon were still “incidentally” harvested.

d) In 1977 the Miramichi experienced a strong salmon run, but this quickly gave way to the dismal returns of 1978 - 1983, culminating in another closure of the commercial fishery which Minister Romeo LeBlanc had reopened in 1981. It is also interesting to note that the desperately low salmon numbers of the early 1980s were still sufficient to produce impressively high adult offspring in the mid 1980s.

e) A 1998 press release from the ASF quoted an expert who referred to the Miramichi as “a dying river”, despite his only ever having fished here once. Several years of healthy returns since then have proven his rhetoric to be both irresponsible and “greatly exaggerated”.

f) Many pools where people recall having had great fishing are now off limits to the public, through the encroachment and assertion of riparian ownership. Were they still accessible, they might still be producing some memorable moments.

6) Current scientific assessments of Miramichi adult stock abundance are subject to significant inaccuracies, often leading to poor decision making.

a) Weather events, funding cuts, monitoring issues, early removal, concentrations of other species, subjective interpretation of data and inconsistencies with headwaters trap numbers all contribute to a lack of confidence in the accuracy of Miramichi adult stock assessments.

b) In 1996, a new and uncalibrated Millerton facility registered an unusually high value for Miramichi grilse populations. The assumption of reliability led to some unfounded predictions for 1997 salmon abundance. The modest returns of 1997 exposed the inaccuracy of the predictions and ultimately led to the crisis mentality of 1998.

c) Minister David Anderson hastily responded to this panic by cutting in half the daily release and retention limits. The MSA successfully protested and reversed the reduced release quota, while applauding and maintaining the halving of the daily grilse retention limit. Its quite clear whose interests were being served. That fall at an ASF function in New York, David Anderson was presented with a prestigious conservation award by Ted Turner.

d) One consequence of this daily quota reduction was that anglers who choose to retain a grilse are forced to cease fishing for the day, while others are permitted to release up to 4 fish. Initiatives to correct this imbalance by permitting release fishing after retaining a grilse were vigorously opposed by both the ASF and the MSA. Since they are on record as supporting live release fishing as harmless, this opposition appears more punitive than protective.

e) Throughout the late 1990s, we were repeatedly told that the Miramichi was not meeting minimum spawning escapement targets. However, extensive electrofishing data collected in subsequent years showed all juvenile classes to be well above optimal values. This inherent contradiction has never been adequately explained.

f) Despite this juvenile saturation, more satellite rearing tanks were rolled out in the name of conservation as a “feel good” revenue source. Many served as a public relations smokescreen for clear-cutters to appear environmentally conscientious. Putting the Miramichi on such conspicuous life support did little to enhance its reputation as a healthy ecosystem. Perhaps we should closely examine the disruptive and intrusive effects of ongoing broodstock collection.

7) The explosion of the striped bass population has had a very detrimental effect on Miramichi salmon stocks.

a) The intense concentration of bass, particularly in the Northwest Miramichi estuary, coinciding as it does with migrating smolt populations, has contributed dramatically to the reduction in smolt survival and subsequent adult returns.

b) Bass stomach analysis alone may not provide sufficient data to verify their impact on smolt stocks. Consider that during their spawning activities, bass exhibit very aggressive behaviour and strike at almost anything with deadly enthusiasm. It is not unreasonable to suspect that a number of smolt are being destroyed without being ingested.

c) The decline in adult returns for both the Northwest and Little Southwest Miramichi certainly appear to have a correlation to the presence of increased numbers of bass.

8) The push for mandatory use of barbless hooks for summer fishing on the Miramichi is completely unnecessary and counter productive. Simply put, barbless legislation leads to pointless prosecutions.

a) I have spoken to a number of anglers, including some guides, who have encountered overzealous scrutiny and loss of livelihood simply because they forgot to or did not adequately pinch their barbs during the spring fishery. This experience has been echoed by many in other jurisdictions where barbless laws are also in place. Such a heavy handed approach to the letter of the law coupled with a light-headed understanding of its spirit is not conducive to building good will among members of the angling community.

b) While it may be an easy score for a warden, it squanders scarce enforcement resources in pursuit of law abiding anglers, wasting time and effort that should be spent on more serious poaching infractions. To use a biblical phrase, we should not be those who “strain out a gnat and swallow a camel”.

c) It is an embarrassing obsession with a millimetre of metal. Modern day barbs are virtually non-existent and on normally sized salmon hooks, they are completely inconsequential. The legal maxim “De Minimis Non Curat Lex” reminds us that the law does not concern itself with trifles, New York’s 16 oz. sodas notwithstanding.

d) Scientific data is inconclusive about the real benefits of barbless hooks, particularly in Atlantic salmon angling. In trout fisheries, where hooks are often more deeply ingested, there may be some benefit but with salmon the advantage is questionable.

e) In clubs and lodges where barbless policies have been adopted, guests are sometimes guilty of cautiously overplaying their salmon to exhaustion in pursuit of a photograph. This may become a more widespread occurrence if barbless hooks are mandated. Some clubs have occasionally set aside their barbless policy to enable preferred clients to hook and land more securely.

f) Some anglers who voluntarily fish barbless hooks find them a convenient way of shaking off a fish of inferior size enabling them to continue angling for a larger one, thus circumventing the four fish release rule.

g) Most anglers do not have the luxury of fishing over hundreds of fish and landing several in a morning. A barbed hook helps to ensure that once hooked, a fish may at least be landed.

My Recommendations

1) We have limited resources and little time to act to reverse the decline of the Northwest and Little Southwest Miramichi salmon stocks. Practical, scientifically based policies should be adopted which will receive the full support of all sectors of the fishery, including the resident angler.

The united effort to close the Greenland fishery underlines how important MSW salmon are to the future of the Miramichi. Protecting this valuable component of the resource from all interceptory fisheries is where our attention and co-operation should be focused.

2) The closure of grilse retention angling will do virtually nothing to put more eggs in the gravel. It should be left open as a preventative safety valve and steps should be taken to permit live release fishing after the retention of one fish per day.

In other jurisdictions such as the Saint John river, zero harvest has become a stepping stone toward a total closure of the fishery. Despite the lack of supporting evidence, the expectation that this regulation will make a discernible difference to Miramichi spawning escapement will lead to inevitable panic and probable closure when it does not.

In November 2013, MSA directors met in Freeport, Maine and recommended cutting the grilse quota in half for 2014. This was dutifully adopted by DFO for the 2014 season with no demonstrably positive effect. It frustrated many Miramichiers, it scared many non-residents and otherwise tarnished the reputation of the comparatively healthy Main Southwest Miramichi.

The temptation to acquiesce once again will undoubtedly prove to be too great for DFO to resist. While this may be the easy option it is certainly not the best one. However, it will most likely absolve DFO from the responsibility to take any other measures to protect the salmon resource. Although it may appease some distant voices, it should be clearly understood that most Miramichi residents realize that this will be of no value in strengthening the resource. We live here and while our voice may be far less eloquent or persuasive, it should not be overlooked.

3) The prohibition against harvesting MSW salmon should be applied universally to all users on the Miramichi.

The 30 year exception which has been made for First Nations users has undoubtedly contributed to a decline in spawning escapement on both the Northwest and Little Southwest Miramichi. Further restricting anglers on the Main Southwest Miramichi will do absolutely nothing to remedy this. It can only be corrected with the mandatory use of trap nets and the selective harvest of grilse only by the First Nations fishery. DFO has the authority and the responsibility to restrict the use of gill nets, which are both lethal and indiscriminate.

4) Further efforts must be undertaken to significantly reduce the numbers of stripped bass in the Northwest estuary, particularly during the time of smolt migration.

Continuing to protect one species at the direct expense of another more fragile resource is both unnecessary and absurd. It is unconscionable that such a threat is allowed to continue unchecked, simply to facilitate a newly discovered fishery for other jurisdictions.

The angling harvest of striped bass should be expanded, and a First Nations fishery should be developed, contingent upon their acceptance of the elimination of gill nets.