

UFAWU-Unifor comments on:

Provincial Framework for Steelhead Management in British Columbia
July 2014
Draft Provincial Steelhead Management Framework

Consultation Process:

The UFAWU-Unifor is very concerned about the consultation process undertaken by the B.C. Fish, Wildlife and Habitat Management Branch regarding the development of the Provincial Framework for Steelhead Management in BC. The Union was not notified about the Draft Provincial Steelhead Management Framework, in fact, as far as we can ascertain, no commercial fishing group was contacted. Not only have we not been accorded an invitation to comment, we were not even advised that the Policy was in development. The Union only found out inadvertently due to a MFLRN presentation to Prince Rupert City Council.

Stakeholder engagement on the Provincial Framework for Steelhead Management in BC will take place via the Provincial Angling Advisory Team (PAAT) and the online engagement process using the provincial Angling, Hunting and Trapping Engagement website. (p12)

There is no representative of the commercial sector on the PAAT and commercial fishers do not frequent the Angling, Hunting and Trapping Engagement website searching for things germane to commercial fishing. However, on the North Coast, Central Coast, WCVI areas and on the Fraser, steelhead regulators have had repeated contact and input into commercial fishing plans and certainly have had interactions with industry representatives. There were not even courtesy calls.

Why should a Steelhead Management Framework interest the commercial sector? If the management framework only addressed the biological, habitat, and angler impacts, there would be little need to talk to commercial fishermen. However, as much of the policy talks about limiting fisheries to prevent the inadvertent bycatch of steelhead we believe that the Province should be talking to those whom they propose to limit.

From the Fishery Program's perspective, the key objective for steelhead is to minimize exposure of summer-run steelhead to non-selective Canadian salmon fisheries in times and places of steelhead migration. An appropriate measure of success would be a continuing decrease in the exposure of steelhead stocks to commercial fishing practices that are not highly selective. (p.10)

First Nations' Consultation:

First Nations Engagement

First Nations in BC will have an opportunity to comment on the Provincial Steelhead Management Framework via the online engagement process. (p.12)

The UFAWU-Unifor is also very concerned that First Nations have not been directly consulted and their interests accommodated. First Nations have FSC interests and economic fishery interests. First Nations own fishing licenses, First Nations have communal economic fisheries, and many commercial fishermen are First Nations fishers. First Nations must be consulted on the issue of steelhead management as their FSC and economic interests are at stake.

Impacts on commercial fisheries:

What is non-selective?

Broad Strategies to Meet Objectives

5. Advocate to reduce or eliminate by-catch mortality for all steelhead stocks intercepted in non-selective salmon fisheries (p.9)

From the Fishery Program's perspective, the key objective for steelhead is to minimize exposure of summer-run steelhead to non-selective Canadian salmon fisheries in times and places of steelhead migration. (p. 10)

Nowhere in the framework does the Province specify what a non-selective Canadian salmon fishery is. It does say that injuries to steelhead can occur from gillnets, seines and traditional fisheries (page 9). So are none of these gears selective?

It does not support non-selective fisheries that occur in times and places of steelhead interception. (p.10)

What does selectivity mean to the Province? Seine fishing is the most non-selective of all salmon gear types – whether beach or purse seining, the net gathers up all fish in the area in a non-species specific fishery. As such, seine fisheries can catch more steelhead than other gear-types. However, seine fishing can allow non-target bycatch to be released alive with a very high success rate. Gillnets are a highly selective gear. Net depth, length, colour, mesh size, twine type, hang ratio, area, time of day, and weedlines are some of the gillnet's selectivity attributes. As a result, a gillnet fishery can have a very low rate of incidental steelhead bycatch. However, a gillnet caught fish has a lower survival rate than a fish caught in a seine net - but fewer are caught.

How selective is selective enough?

The MFLRNO strongly supports sustainable commercial fisheries as a viable industry; it supports commercial fisheries that enable maximum or as near to maximum steelhead escapements to locations upstream of commercial fisheries as possible. (p 10)

An appropriate measure of success would be a continuing decrease in the exposure of steelhead stocks to commercial fishing practices that are not highly selective. (page 10)

The provincial steelhead framework says that it will support a sustainable commercial fishery, then limits their support to fisheries that enable maximum steelhead escapements.

What is a maximum steelhead escapement?

That which occurs when there is no commercial fishing? When there is a seine fishery only? When there is a gillnet fishery with the highest level of selectivity but at an uneconomic cost to the fisherman? Should there be lower commercial harvests in order to maximize steelhead escapements? What is the measure of fairness - or is the only metric steelhead escapement?

Is the commercial fishery important to the economy of B.C.?

The wild salmon fishery is important to the BC economy. The salmon fishery alone generates 237.8 million dollars per year in wholesale value (average 2001-2010) (Ministry of Environment Ocean and Marine Fisheries Branch. B.C. Wild (Capture) Salmon Production <http://www.env.gov.bc.ca/omfd/fishstats/graphs-tables/wild-salmon.html>) ‘

Many of these fisheries take place when steelhead are co-migrating with target salmon stocks and are caught inadvertently. The steelhead framework does not try to balance the value to the BC economy from the commercial salmon fishery against the value of the steelhead fishery. Neither does the framework attempt to balance the social benefits of both fisheries. In the Union’s estimation, both make valuable economic and social contributions to BC society and accommodation should be made on both sides.

The steelhead framework only discusses the benefits of steelhead fishing and proposes that the commercial fishery be shut down when steelhead is present in order to maximize steelhead escapements to maximize benefits to the recreational fishery.

When non-selective commercial fisheries operate in times and places of adult steelhead migration, by-catch mortality can be significant, seriously reducing the numbers of adults available to the recreational fishery (pp9-10)

BC recreational fishery estimated at \$480 million annually based on the 2005 Survey of Recreational Fishing in Canada. (footnote p. 9)

How much of the value of the Recreational fishery is generated by the Steelhead sector is not noted.

Who makes the decisions in a specific area?

The Provincial Steelhead Management Framework leaves the whole subject of regional management plans to 'regional MFLNRO staff working with regional stakeholders' (p.12). (The inference in the whole document is that regional stakeholders are sports sector representatives listed on page 13. Nowhere in this framework are commercial fishers identified as stakeholders.) The staff will be guided by the Steelhead Management Framework. Since there is no guidance regarding selectivity, the Regional staff seems to be left up to its own initiatives. In many areas of the coast, in the past, this has led to calls by Regional staff to close down commercial fisheries as non-selective.

Stock-specific management plans and activities should be developed and implemented at the regional level by regional MFLNRO staff working with regional stakeholders. These initiatives will be guided by the Provincial Framework for Steelhead Management in BC and the Steelhead Stream Classification Policy.(p12)

On the Skeena, for example, there has been much strife over the historic 120 year gillnet fishery at the mouth of the river. There is no mention of any commercial stakeholder from the Skeena having any place advising the MFLNO staff. But the Framework (p. 13) lists the North Coast Steelhead Alliance as one of the members of the Provincial Angling Advisory Team. The North Coast Steelhead Alliance openly calls for the elimination of the Skeena gillnet fishery:

Despite all the DFO's dressing up of gillnets with various lengths, set times, mesh sizes, etc there will never be any way for these net to be truly selective in practise. With more and more depressed salmon stocks in need of careful management and the economic and social values associated with steelhead, the time has come to eliminate the gillnet as a acceptable fish capture technique. Website: North Coast Steelhead Alliance <http://steelheadalliance.com/the-solutions/>

Sharing the resource

Abundance-based framework

The Union would like to discuss many of the assumptions of the Framework on the suggested abundance-based framework. It does not seem to be designed with any mortality impacts in mind – only with the idea the maximum escapement is the goal and management decisions are all based on maximizing escapement. Maximizing escapement can only mean minimizing mortalities and thus is the driver behind a policy that demands that the commercial fleet reduce its impacts on steelhead to zero.

A zero mortality policy is not good for the steelhead population and is not good for the salmonid (or other freshwater fish species) ecosystem – if a top predator like steelhead is kept at maximum freshwater productivity it can only be done with maximum food. That can create an imbalance in any ecosystem where the predators' food is being cropped by another's use – in this case a commercial fishery.

Management Zones:

Management is to be determined by the percentage of carrying capacity utilized by the steelhead population. The Routine Management Zone, which is determined by greater than 30% carrying capacity will have angler opportunities maximized.

Routine Management Zone (RM) – Provide a diversity of social, economic and cultural benefits while maintaining healthy stocks (>30% carrying capacity)

Maximize angler opportunities to the extent possible. P 25

There is no discussion on how this level, or any other level of Management Zone should impact the commercial fishery. Is the commercial fishery to share the benefits of a 'routine' management regime or are all the benefits to go to the recreational sector? Is the commercial sector to minimize its steelhead impacts at every level of stock abundance?

The United Fishermen and Allied Workers' Union-Unifor is disappointed in the lack of respect that the Province has shown the commercial sector in its proposed steelhead policy.

However, we are willing to participate in a process that supports a healthy steelhead resource and steelhead industry and at the same time a healthy marine commercial fishery.

Steelhead harvest (via commercial by-catch, First Nations or recreational fisheries) has the potential to severely impact abundance. Therefore, careful regulation and cooperative planning is essential to achieve shared management goals.p 4

We believe the above to be true. We also know that the demands of many of those in the steelhead sector have led and would lead to the closure of the commercial salmon fishery. The Province benefits from having strong commercial fishery and steelhead sectors.

The Union asks the Minister to consult on its steelhead framework directly with First Nations and the commercial sector so that a balance can be achieved.

Respectfully,

Joy Thorkelson
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