

NORTH COAST SALMON IFMP advice to DFO

April 9, 2018

**Area C Harvest Committee
Native Brotherhood of B.C.
Northern Native Fishing Corporation
UFAWU-Unifor**

1. **Skeena Sockeye:** 240,000 has been included for the first time in the IFMP as the interim lower biological benchmark for Skeena River wild sockeye.. This has not been discussed with the commercial fleet and we do not know the derivation of this ‘biological benchmark’. We guess that it is simply an addition of the ‘biological benchmarks’ for each wild system. If that is so, then it is an error in logic. For example if every wild system had a small number attached to it as a 40% Smsy, - all small systems could all be well above that number, and one large wild system could be below Smsy and the aggregate wild stock ‘biological benchmark number’ would not be reached, even though 90% of the wild systems, in this example, were well over 40% Smsy. The opposite could also be true. One large wild stock well above Smsy could mask myriads of small stocks that were below that benchmark.

Werecommend that until proper consultation on this ‘interim lower biological bench mark of 240k for wild Skeena sockeye stocks’ takes place, it should be removed from the IFMP.

“This action is required to meet the interim lower biological benchmark of 240k (40% Smsy) for wild Skeena sockeye stocks (WSP Conservation Units).”

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 92 of 449

2. **The following chart should not be used to describe allocation decisions.** It seems to apply that at high abundances that commercial fisheries only can have directed fisheries at the highest of high abundances. Not how we read the allocation policy. We recommend that it be changed to show that under High Abundances commercial fisheries have directed fisheries in all 3 columns.

Allocation decisions are made in accordance with *An Allocation Policy for Pacific Salmon:*
<http://www.dfo-mpo.gc.ca/Library/240366.pdf>

Table 7.1-1: Allocation guidelines

	Low Abundance		High Abundance		
	Non-retention / closed	By-catch Retention	Directed	Directed	Directed
First Nations FSC	Non-retention / closed	By-catch Retention	Directed	Directed	Directed
Recreational	Non-retention / closed	Non-retention	By-catch Retention	Directed	Directed
Commercial	Non-retention / closed	Non-retention	By-catch Retention	<u>By-catch Retention</u>	Directed

NOTE: This table describes conceptually how First Nations, recreational and commercial fisheries might be undertaken across a range of returns. It does not imply that specific management actions for all stocks exactly follow these guidelines, but rather is an attempt to depict the broad approach.

3. We would like to point out that the quoted study below underlines our concerns about present DFO policies that encourage the stripping of jobs from northern central coastal communities and sending our fish offshore to be processed. Communities will not support a fishery that does not provide benefits to their residents. Policies Pacific Region have been following have increasingly turned the resource over to corporate owners who are consolidating control over harvesting, processing and marketing, leaving coastal communities and their residents behind. The Fisheries Act amendments permit the Minister to consider social impacts on communities and Area C Harvest Committee, the NBBC, NNFC, and UFAWU-Unifor recommend that the Minister consider Pacific Region policy changes that will benefit working fishermen and their communities.

The GSGislason 2017 study also indicates that salmon processing is frequently pursued in different region than the area where landings are loaded off the fishing vessels. While chinook landings occur mostly on the North Coast, its processing happens mainly in the Lower Mainland (about 65% of all processed chinook). Similarly, landings of coho also happen mainly on the North Coast (80%), but its processing is pursued mainly in the Lower Mainland (75%). Pink salmon is landed mainly in the North Coast (about 60%) but processed in the North Coast and Lower Mainland (45% and 40%, respectively). Chum landings (63%) and processing (75%) occurs mostly in Lower Mainland. Sockeye landings and processing occurs mostly on Vancouver Island (58% and 55%, respectively) (GSGislason & Associates, 2017).

4.3.3 EXPORT MARKET

The province of British Columbia benefits from strong seafood exports that in 2016 were valued at about \$1.33 billion, an 18% increase when compared to 2015 (about \$1.13 billion⁷). This total value was realized via combination of seafood that was supplied by domestic wild harvest and aquaculture as well as raw seafood imports (Sector Snapshot 2016: BC Agrifood & Seafood). Chum, pink and sockeye salmon were among the most widely exported wild salmon species in 2016 (by volume). They constituted 35%, 30% and 24% of the total volume of wild salmon exports from BC respectively. In 2016 chum was shipped to 33 countries, with US and China being the biggest importers of this salmon species (by value). Pink salmon was exported to 20 countries, with China and Thailand constituting the most significant importers (by value), and sockeye was exported to 21 countries, US and UK with being the biggest sockeye importers (by value).

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 61 of 449

4. **The Nass Chum rebuilding plan** requires the appropriateness of the ER objective (which is now at 10%) to be reviewed each year with the DFO, Nisga'a Fisheries and other interested parties. Area C Harvest Committee and other commercial organizations are interested parties and have never been included in a review of the appropriateness of the Nass chum ER. We also point out that chum have been returning in quite large numbers to the Nass systems in recent years and a 10% goal has a very restrictive impact on our fisheries. Recent ERs have been 30% below that allowable impact, (7% ER out of an allowable 10%) and hundreds of thousands of dollars are swimming by while a review is not being done. **We recommend that the rebuilding plan and appropriateness of the ER objective should be reviewed prior to the 2018 season.**

APPENDIX 7: NASS CHUM DRAFT REBUILDING PLAN

The appropriateness of the ER objective should be reviewed each year taking into account the latest stock assessment information.

Review Nass chum assessments, status and the rebuilding plan with FN technical committees and with the Nisga'a JFMC, the IHPC and other interested parties.

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 443 of 449

5. **Directed chum fishery on Alaskan enhanced chum:** The net fleet should be **targeting** Alaskan hatchery chum in areas with low impact on Nass wild chum; Alaska enhanced chum should no longer be considered as bycatch in a sockeye directed fishery. A directed fishery would permit the use of chum gillnets that selectively avoid sockeye. We would remind DFO that the Salmon Treaty does not prohibit the targeting of chum in this area, the Alaskans stated over the bargaining table that they are aware of our increasing Alaska chum intercepts and made no complaint, and Alaskans are not cooperating with Canada's concerns over Skeena and Nass sockeye. The gillnet and seine Alaskan chum directed fisheries can be shaped to avoid Canadian chum (with an allowable cdn chum ER as set after the Nass chum review as recommended above) and Skeena or Nass Sockeye, if necessary.

We strongly recommend that DFO write into the IFMP a directed fishery on Alaska Chum for 2018.

13.2.3.3 DECISION GUIDELINES AND MANAGEMENT ACTIONS

Commercial fisheries in Areas 3 to 5 will be managed to avoid wild chum stocks. There will be no opportunities for directed harvest on wild Nass or Skeena chum.

Retention of chum in Area 3 will be permitted as by-catch in times and areas coinciding with high abundances of US hatchery origin chum, while still meeting the objective of maintaining reduced impact on Canadian wild stocks. All other times and areas will remain non-retention/non-possession of chum in Area 3 fisheries. Otolith samples will be collected in Area 3 to determine the presence of US hatchery chum in both retention and non-retention area.

- Gill nets have a 137 mm (5.39 inch) maximum mesh restriction. This restriction is in place so that sockeye is targeted selectively and larger, non-target species such as chum and chinook are impacted to a lesser degree.

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 207 of 449

Area A (Seine) and Area C (Gillnet)

- There will be no directed commercial opportunities for wild Nass or Skeena chum.

• Retention of chum as by-catch in Area 3 will be permitted in times and areas coinciding with high abundances of US hatchery origin chum, while still meeting the objective of maintaining reduced impact on Canadian wild stocks. All other times and areas will remain non-retention/non-possession of chum in Area 3 fisheries. Otolith samples will be collected in Area 3 to determine the presence of US hatchery chum in both retention and non-retention area. All fisheries will be announced via fishery notice.

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 211 of 449

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6. Area 6 is not central coast, it is north coast and always has been.

2018/2019 Salmon Integrated Fisheries Management Plan – Northern BC Page 213 of 449

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7. **Skeena sockeye has been late 4** out of the last 4 years and DFO needs to have a plan on how we can prosecute a commercial fishery if sockeye numbers return above escapement requirements (1.050m). A commercial gillnet and seine fishery should occur if the run size permits – and that means determining run size based on normal and late timings. A fishing plan has not been discussed with industry on what would take place if the sockeye run returns in fishable numbers. A fishing plan and any restrictions on fishing due to chum and steelhead concerns need to be discussed now, not in the middle of the season.

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8. **Interim Transfer Rules:** Area C Harvest Committee would like to point out to DFO that in 2016 and 2017 there was not CSAB agreement with the SCC-CSAB interim transfer rules that permitted individuals or groups of individuals with licenses in A-H fisheries to make individual decisions to ITQ their individual licenses and then lease their ITQ to another A-H fleet.

The CSAB CSAF Agreement was reached with the understanding that each fleet (by harvest area) would determine the 'management style' for each fishery. ITQs were not to be forced on any fishery. If a fleet agreed to have an ITQ fishery or to permit individuals to individually ITQ their license for a specific fishery, then because there was fleet agreement, that management strategy could occur.

This was the foundation of the Evergreen CSAF Agreement. The CSAB understood that DFO recognized the compromises that occurred to create this consensus agreement and would not make unilateral changes to the catch allocation percentages agreed to, nor changes to the consensus language reached.

The CSAB has met on January 25/25, 2017, and again reiterated our consensus agreement that each fleet shall have 'self-determination' for its fishery management style.

If DFO has made a policy decision that individuals can ITQ their licenses and transfer their commercial allocation from one A-H fleet to another, then it should specifically state that in a policy letter. Otherwise, it looks like a back-door attempt to inveigle ITQs into every fishery. Area C fishermen do not agree that the gillnet allocation should be made smaller by permitting individual licence holders to lease their 'ITQ' to a different A-H gear. For example, gillnetters have a 75% Nass/Skeena sockeye allocation and do not support ITQing their licenses and transferring gillnet sockeye allocation to seines.

The RDG wrote in a July, 2017, letter to the Harvest Committee that it is an ongoing practice that individuals can transfer their license to another individual without fleet permission. We agree – however, it is not an ongoing practice to allow an individual to ITQ their license when the fishery is not an ITQ fishery and transfer their 'quota' to another fleet. Yet, this is what DFO is allowing in the Interim Transfer Rules.

Area C does not agree that individuals should be able to remove 'quota' from an allocation relied upon by gillnetters in a regular competitive fishery and transfer it to First Nations either. **However, our gravest concern remains at this time is the ability of individuals or groups of individuals to transfer gillnet allocation to another A-H gear group.**

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9. **Revival Boxes in the gillnet Conditions of License (CoL).** This problem was first spotted in the 2014 Johnstone Straits fishery. The CoL require the gillnet revival box to be much larger than the north coast gillnets are presently using. The difference between north and southern revival boxes was created in the early 2000 when Dave Einarson was North Coast Manager after the NNFC and the UFAWU, with support from DoT, raised the issue of safety and revival box size. All northern gillnet survivability tests had been done using the smaller northern-style boxes.

Gillnetters, for the most part, did not know that the requirements for southern revival boxes were different from the north's. So in 2014, when C and P threatened to charge the northern gillnet fleet that was fishing in Area D with non-compliant revival boxes, DFO management had to intervene.

We have raised this issue each year since 2014 – and in 2018 we could very well once again see northern based gillnetters with northern boxes being charged with, - not not using their boxes – but with having a box not in compliance with the CoL configuration.

We highly recommend that this issue be resolved by applying the northern requirements to Areas D and E prior to the 2018 Gillnet CoL being published.

10. **Monitoring:** Area C Harvest Committee, Ecotrust Canada, DFO and processors worked hard in 2017 to develop a 'Supersales Slip' (SSS) program with the aim of providing DFO with more accurate logbook and catch information - in a more timely fashion. DFO agreed that the next step would be a demo fishery to assess the SSS program in actual fishing conditions. Area C has asked DFO since fall 2017 to work with Area C and the Processors to create a small demo (test) program for 2018.

DFO does not appear to want to work on a Supersales Slip demo project in 2018. This would put to waste all the resources DFO and other entities expended on this project in 2017, along with the money put towards this project by the Northern Fund of the PSC. We have been working on this project since 2009, demonstrated the software to DFO and processors in 2017 created a SSS that complied with 2017 CoL and we are ready to go. Why the resistance to a project that is cheaper for the fleet and will provide DFO with more accurate and timely information?

We recommend that DFO approve (or amend and approve) the SSS so processors can publish new fish books in time for the June Area C fisheries, and assist us in developing a demo fishery.

Respectfully submitted