

**Strategic and Operational Advice from the Commercial Salmon Advisory Board  
(CSAB) to the Departmental of Fisheries and Oceans (DFO) on Updating the  
Commercial Salmon Allocation Framework (CSAF).**

**February 9, 2015**

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Representatives to the CSAF Process**

**Error in the following:**

**Strategic and Operational Advice from the Commercial Salmon Advisory Board (CSAB) to the Department of Fisheries and Oceans (DFO) on Updating the Commercial Salmon Allocation Framework (CSAF). February 9, 2015:**

Page 22 – proposed sharing arrangements for chinook, production area 6.

A transcription error in sharing arrangements for Areas D and E was found. The original and corrected version is shown below.

p. 22	ID	Spp	ProdArea	LicArea	CSAB Jan 30	Notes	Corrected Version	Corrected Notes
	New – WCVI Inside	Chin	6	B	5 %	Area 23 sharing arrangement currently 33.3% SN:66.7% GN. May need to review	5%	Area 23 sharing arrangement currently 33.3% SN:66.7% GN. May need to review
				D			<b>75 %</b>	<b>Area 25 fishery, Potential for future review. 75% fishery to D (e.g. Conuma Bay); potential 5% to Area E if future surplus at Nitnat. Otherwise default to D)</b>
				E	<b>75 %</b>	Area 25 fisheries (e.g. Conuma Bay)	5%	
				G	15 %	Winter troll fishery	15%	Winter troll fishery
				H	0 %		0%	

## **Acknowledgments**

We want to acknowledge the significant effort by all the participants from the Commercial Salmon Advisory Board during Phase 3 of the goal of updating of the Commercial Salmon Allocation Framework. The representatives are passionate about the salmon resource and the need for healthy productive salmon populations. They are equally passionate about the various fleets, union and processor segments of the commercial fishing industry and their strong desires to have a functioning, stable and healthy fishery that can support all groups' aspirations.

We would like to thank the Department of Fisheries & Oceans for this extended opportunity to seek solutions to the issues and provide recommendations from the CSAB perspective.

We would like to thank Jeff Grout and Cynthia Johnston from DFO for their assistance with producing and updating the Historical Commercial Salmon Allocation tables and in particular Jeff for attending at the CSAB sessions when requested to help run the retrospective analysis.

We would like to thanks Pam Cooley for her facilitation of the small group sessions and all the SCC and DFO small group participants. This was a very important part of the Phase 3 process.

We would also like to thank Dawn Steele for her professional and timely note taking.

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## 2 SUMMARY

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The Commercial Salmon Advisory Board (CSAB) was invited in the summer of 2013 by Fisheries and Oceans Canada (DFO) to participate in a process to update the Commercial Salmon Allocation Framework (CSAF) which is part of the broader DFO Allocation Policy for Pacific Salmon. At the end of the planned review in May 2014 the CSAB requested an extension to allow them to work with an advisor/facilitator and build on their converging views they were calling an Evergreen proposal. The First Nation Salmon Coordinating Committee (SCC) who were also invited by DFO to form part of the review also wanted more time to provide input. This was important as the two groups with DFO were able to continue to meet to explore each other's interests while developing a better understanding of common elements and areas that required further considerations.

Section 4 describes the objectives on which the CSAB planned to provide further recommendations to DFO. Early on it was clear that providing allocations by fishery production areas by fleet and by species could be problematic with what seemed like different objectives for their use between the commercial Area A-H fleets and the new First Nations economic fisheries. The CSAB realized that it needed a document that provided the intent and guiding principles for implementing a new CSAF to match the new allocations. We have tried to be clear on the interests of the CSAB and provide ideas and principles for how all fisheries can cooperate and collaborate to maximize each fleets allocations and meet conservation objectives. The addition of the First Nations economic fisheries was seen to have added a further complexity to the management of Pacific salmon but also opportunity to work together to more fully access the available total allowable commercial catch each year. The CSAB views this opportunity to work directly with the First Nation interests and DFO as the appropriate and constructive way forward. Considerable time was spent with a small group of representatives from the CSAB, the SCC and DFO to consider proposals and explore each party's interests. Through this process we believe that a better understanding of each party's interests is emerging and that the agreement to develop a joint commercial management board will benefit all parties

The CSAB provides recommendations on 15 issues in Section 7. There was not complete consensus on all recommendations and where not we have described the various options. As a group the CSAB had to explore the details of operationalizing the new CSAF to best be able to populate the allocation table. In the time we had we were able to make significant progress on many issues however we ran out of time with the result we were not able to reach consensus on all the allocations by fishery production area, by species and fleet. Even with more time we may not have been able to reach agreement on all allocations. This should not be a surprise to anyone knowledgeable of salmon management as we were trying to forecast 5 years and longer into the future what each of the species relative abundance would be or more precisely how they might change from what has been experienced in the recent past and who would be able to access any surpluses and what stocks or species might be a conservation concern and thus limiting fisheries. To date the allocations have been set annually but having agreed to longer term arrangements was unsettling for some.

The term Evergreen proposal is appropriate to what the CSAB set out to accomplish with updating the CSAF. The CSAB will need to continue to work cooperatively and collaboratively to achieve their goals and ensure the CSAF operates to the benefit of all fleets. We hope that DFO and the First Nations will also continue to build on this work with the CSAB as outlined in our recommendations.

### 3 INTRODUCTION

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In July 2013 the Department of Fisheries and Oceans (DFO) released a Terms of Reference (TOR) for Updating the Commercial Salmon Allocation Framework (CSAF). The scope of this work is on updating the commercial salmon allocation arrangements within “*An Allocation Policy for Pacific Salmon*”<sup>1</sup>(<http://www.pac.dfo-mpo.gc.ca/fm-gp/speciesespeces/salmon-saumon/pol/index-eng.html>).

The TOR state “This initiative is intended to address one element of the Mitigation Program to implement changes to the Chinook Chapter of the Pacific Salmon Treaty (PST) announced by the Department in 2010. This includes addressing the deficiencies in the current commercial salmon allocation framework that were identified by the CSAB and the Integrated Advisory Group (IAG) formed to provide advice on PST mitigation. Equally as important, this work is intended to improve the long term stability, certainty, and resilience of the commercial salmon allocation arrangements, and provide more flexibility to licence holders to make effective business decisions, and thereby better respond to uncertainty in salmon abundance and changing market conditions”<sup>2</sup>.

DFO has worked with First Nations and commercial interests, and the Province of BC, to update the commercial salmon allocation framework. In Phase 1 and 2 of this review the department sought input from the Commercial Salmon Advisory Board (CSAB), First Nations interests through the Salmon Coordinating Committee (SCC) and the Province of BC. At the end of Phase 2 the CSAB wrote to DFO to recognize the significant progress that has been achieved, in terms of improved understanding and convergence of views, both among CSAB members and in the small group meetings that involved CSAB, DFO and SCC representatives. The CSAB also noted they thought they could achieve more and assist in resolving the priority CSAB issues if DFO would agree to an extension of time. The Phase 2 Report Updating the Commercial Salmon Allocation Framework<sup>3</sup>, documents the progress made on identifying the issues around the current CSAF as well as progress towards common elements for updating the CSAF from both the CSAB and SCC. The SCC also wrote to DFO requesting more time. After consideration of requests for additional time for developing recommendations DFO responded to both groups in September 2014 that they would agree to additional time and resources and extended the process until the end of January 2015 (Phase 3). It is understood that following Phase 3, the Department will consider the received advice and will brief the Minister of Fisheries and Oceans Canada who will make a decision on any changes to the current commercial salmon allocation framework.

The purpose of this paper is to summarize the advice, from this extended period (Phase 3), from the CSAB to DFO on updating the CSAF. The CSAB believes its recommendations in this report meet the key DFO objectives provided in the TOR:

1. To increase the stability of the commercial salmon allocation framework;
2. To increase flexibility of licence holders and producers to better adapt and optimize economic benefits in an uncertain business environment;
3. To improve compliance with conservation objectives;
4. To simplify and streamline rules and processes to allow commercial harvesters greater opportunities to self-adjust;

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<sup>1</sup> An Allocation Policy For Pacific Salmon, DFO, (1999)

<sup>2</sup> Terms of Reference for Updating the Commercial Salmon Allocation Framework, Fisheries and Oceans Canada, Pacific Region, July 29, 2013

<sup>3</sup> Updating the Commercial Salmon Allocation Framework, Phase 2 Report, Pam Cooley, October 2014

5. To improve required standards for monitoring and catch reporting so that timely and accurate information is available to decision-makers to support prosperous, sustainable fisheries;
6. To promote effective management arrangements and support open, transparent and collaborative decision making;
7. To provide clarity when costs of management are shared by those who benefit from the harvest of the resource;

## 4 OBJECTIVES

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The CSAB has agreed to provide recommendations to DFO based on CSAB deliberations for the following outstanding priority issues:

1. How to fix the shares for the commercial fleets at the fishery production area level.
2. Decide on a fixed initial term for the Evergreen plan (review to follow the initial term).
3. Troll mitigation buy-down and effects on allocation.
4. Area re-reselection (permitted or not).

Additional clarity and direction will be summarized for DFO on how to deal with more challenging fishery management issues.

Once the CSAB has been able to discuss and provide recommendations on the above priority issues, further CSAB meetings will be used to discuss appropriate rules and management for First Nations commercial fisheries, as those relate to the future viability of commercial fisheries. Topics to be discussed and recommendations from CSAB will cover the following:

- Definition and allocations for ESSR fisheries.
- First Nations commercial fishery rules for all fisheries in common areas (flexibility/fairness issues).
- Temporary leasing of licence shares (e.g. Area C issues)
- Tracking of allocation/transfers
- Monitoring, compliance and traceability.
- Cap on transfers from existing marine commercial fisheries, fleet size & viability.

If time permits, and once CSAB priority issues have been discussed with recommendations outlined, discussion of additional topics that DFO may propose will occur.

## 5 PROCESS

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The Regional Director General of DFO responded to the CSAB request for additional time and funding in a letter dated September 18, 2014<sup>4</sup>. In that letter DFO agreed to fund an advisor/facilitator, support additional meetings until the end of January 2015 and required a report from the CSAB on their progress. The CSAB responded with their agreement to the conditions stipulated in the DFO September letter. Barry Rosenberger was contracted as the advisor/facilitator to the CSAB to assist members with their task of providing further advice to DFO on the updating of the CSAF. DFO also contracted Dawn Steele to take notes in all CSAB internal meetings. The CSAB initially met with DFO November 3, 2014 to review the extended process and timeline, review, discuss and have an understanding of the expected outcomes, review roles and responsibilities and identify what was needed to support the process (data, information). The CSAB met for a total of 8 days amongst themselves with the advisor/facilitator

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<sup>4</sup> Letter from Fisheries and Oceans Canada, Regional Director General, to the Commercial Salmon Advisory Board, Re: Updating the Commercial Salmon Allocation Framework, September 18, 2014.

between November 24, 2014 and January 28, 2015. As in Phase 2 a small group was constituted to assist in understanding interests and proposed changes to the CSAF from each of the CSAB, SCC and DFO. The small group comprised of 4-5 representatives from each of the CSAB, SCC and DFO. The small group met a total of 5 days between November and the end of January. Dawn Steele also took notes in the final small group meeting on January 16, 2015. The mandate of the advisor/facilitator was to provide strategic and operational advice on potential implications of proposals to update the Commercial Salmon Allocation Framework, review and analyze policy documents, interest group proposals and meeting summaries and facilitate all CSAB only sessions.

In agreeing to Phase 3 DFO recognized there may be differences in some elements of this work amongst the CSAB and they encouraged us to narrow those differences to the extent possible and to document any differences in the final report. In the Recommendation section where there is not full agreement we provide two or more recommendations.

Notes from each CSAB session were distributed after each session to members to form a record of these proceedings for their use. These notes record action items, the general discussion and examples of issues as well as what is working, that facilitated debate and understandings that ultimately lead to recommendations in the final report to DFO. It is important to CSAB members that the intent of these proceedings be recorded to assist with any reviews in the future of the sharing arrangements or possible implementation by DFO or others that was not intended by the CSAB. Given the openness of the discussion which allowed the exploration of many ideas the notes are not being attached to this report but rather are for CSAB members only.

The following list are the participants with their affiliation who attended all or some of the CSAB meetings:

Chris Cue, Area A/B	Rick Haugan, Area A
Bob Rezanoff, Area A/B	Chris Ashton, Area B
Rob Morley, Processor	Joy Thorkelson, Area C
Mabel Mazurek, Area C	Henry Clifton, Area C
Kim Olsen, UFAWU	Heather Mearns, UFAWU
Guy Johnson, UFAWU	Ryan McEachern, Area D/E
Darrel McEachern, Area E	John Hughes, Area F
Ron Fowler, Area F	Mike Wells, Area G
Ray Jesse, Area G	Mike Griswold, Area H
Dane Chauvel, Area H	Barry Rosenberger, Advisor/facilitator
Dawn Steele, Note taker	

The following were the chosen representatives from the CSAB to participate in the small group sessions with the SCC and DFO:

Bob Rezanoff	Chris Ashton, alternate
Joy Thorkelson	Ryan McEachern
Dane Chauvel	Barry Rosenberger

On December 8, 2014 the CSAB provided to DFO, as required, a draft initial allocation by 24 fishery production areas by species and gear along with a principles and rules paper on how to interpret the allocations. This first sharing arrangement was for the most part populated as a result of many considerations and give and take amongst the group, however there were some species or areas where



making a final sharing arrangements was difficult without knowing what might result from the discussions at the small group sessions therefore the final sharing allocations were to occur near the end of the process.

## 6 DISCUSSION

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Building on the work conducted during Phase 1 and 2 of the commercial salmon allocation framework update the CSAB focused on their Evergreen proposal during Phase 3. As previously indicated the CSAB are very supportive of all First Nations economic fisheries being included in the CSAF. Early in Phase 3 the CSAB developed a draft initial allocation by species, fishery and gear for each fishery production area and a principle for transferring any licence share to a First Nation economic fishery. Setting each licence share for the purpose of transfer sets both a method of valuing each licence for voluntary relinquishments and for setting its share in any transfer to a First Nation economic fishery. At the small group sessions both the CSAB and the SCC agreed that the transfer of licences be based on voluntary commercial relinquishment of existing licences and calculated as a % of commercial share based on 1/current total fleet size and by fishery production area. As the SCC has indicated the First Nations may desire to fish their licences in Area A-H fisheries or as approved First Nation economic fisheries in new locations and with new methods. It was also agreed there needs to be an accounting framework that reports annually on numbers of licences purchased and distribution in existing marine Area A-H fisheries as well as First Nations economic fisheries both in marine and inland waters.

Through the discussion of setting each of those fleet allocations a number of principles or issues were documented. These principles/issues detail such issues as how fisheries are managed today at the local level that may be different than the CSAF sharing arrangements (e.g. for reasons such as very small salmon returns to a particular area which would be harvested with different gears than the allocation framework would indicate). Also they highlighted areas of concern that needed further discussion with both DFO and the SCC about how new First Nations economic fisheries might operate. The first draft of the initial allocations shared on December 8, 2014 was not to be considered final by any of the parties (CSAB, SCC and DFO) as all CSAB participants wanted the opportunity to reconsider the allocations again near the end of the process for possible changes once a number of tasks were completed such as mitigation buy-outs and Area re-selection as well as having a better understanding from the small group interactions on issues such as treatment of bycatch and how First Nations economic fisheries were being proposed to be structured and operated. Some of discussion on principles/issues are provided as follows.

Setting initial shares: Many issues were raised about how the current coast wide allocations by fleets were not working. Key were the inability to shift chinook harvest from outside fisheries to inside fleets, species cannot be shared between northern and southern fleets, much lower sockeye returns in a number of years in the Skeena River, Rivers/Smith Inlets and the Fraser River and the reduced fishing opportunities due to stocks/species of concern that result in "paper" TAC. In setting new initial allocations the CSAB members agreed they would be at a fishery production level, by species and gear. Given there has been considerable uncertainty in annual returns and widely variable rates of returns of many species the new allocations are intended to reflect sharing on a 4 year average not necessarily annually (e.g. large Fraser sockeye years result in varying catch shares from small years in the past and are expected to continue). There was agreement that the new allocations were for a longer period to

give stability to fleets and the allocation framework. There was agreement for a review in the new CSAF but a hope that the allocations would be rolled over to further terms hence the “Evergreen” concept. A five year period of agreement with a review after four years was felt to provide both stability of the CSAF as well as opportunity to adjust if needed. The CSAB agreed on the principle that no fleet should be left out of the water as they set allocations and transitioned to the new CSAF. Recent historical catches and sharing arrangements were the main source of input for setting the new initial allocations but also we looked at SCORE<sup>5</sup> recommendations and expected changes in species returns (coho in 2014, southern chinook initiative, and Rivers Inlet sockeye). The following significant issues proved difficult; 1) moving from the coast wide fleet shares to fishery production level for the Area H fleet. Using the coast wide arrangements currently in place for the total troll fleet of 22% there is little or no TAC for Area H after the allocations to Area F&G fleets. Following the principle that no fleet should be left on the beach the southern net fleets agreed that Area H should get an allocation from their shares and be similar to but not exceed an individual gillnets allocation while the Area H fleet felt it should have a larger allocation reflecting that trollers were allocated a larger cpue in the Kelleher<sup>6</sup> process. The Allocation Policy adopted principles from the Kelleher recommendations are the use of annual gillnet, troll and seine target allocations represented on a coast-wide target share of the TAC and expressed in sockeye equivalents (SE). The use of cpue was adopted for the purpose of adjusting target allocations based on maintaining the relative catch per licence within each gear constant in the case of publicly funded buyouts. Considerable time and effort was expended reviewing the new allocations in a retrospective analysis which generally indicated the Area H troll fleet was allocated shares similar to the Area D & E gillnet fleets but less than other troll fleets. The Area H submission near the end of the Phase 3 process contains two elements that were not considered by the whole group in the Phase 3 process and as such will not be commented on in the report. They are the relative selectivity of the Area H fleet in context to the Allocation Policy concept to rationalize a larger share and that if the Area H proposal was not accepted to increase their fleet share then they want a set share of the Mitigation funds to use to buy gillnet fleets share to increase the Area H share. ; 2) allocating coho in most fishery production areas. In both the south and north coast’s, coho has been mainly managed in recent years as a release mortality to optimize harvests of other target species. Initial shares have been provided for some fishery production areas and fleets and in others they have been left to be determined once improved returns provide retention harvests; and 3) providing Area G access to Fraser sockeye in large return years but not necessarily in all years. Initial share options will rationalize where there are multiple options in the recommendation section. Bycatch was also a main issue and will be discussed further in the fishery management discussions. And lastly it is acknowledged that the sharing arrangements in the allocation table are not fixed entitlements but are a projection of available fishing opportunities and we expect DFO and all parties involved in management will put best efforts to achieve coast-wide target allocations by gear type. And although best efforts will be made to achieve these allocation targets, no guarantees are offered between fleets and First Nations economic fisheries that target allocations will actually be achieved in any given year.

Fishery Production Areas: DFO provided a table with 22 fishery production areas at the start of Phase 3. The CSAB has added 3 fishery production areas, which were agreed to by the SCC, to better reflect

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<sup>5</sup> Diamond Management Consulting Inc., Salmon Management Reform, SCORE report, 2008

<sup>6</sup> Stephen Kelleher, Q.C., Report to the Honourable David Anderson Minister of Fisheries and Oceans Re: Commercial Salmon Allocation, 30 April 1998

current operations of fisheries in those areas. Essentially these are dividing PST aggregate abundance based management (AABM) chinook fisheries from inside chinook fisheries in both North Coast Areas 1-5 and WCVI Areas 21-27 as well as separating the AB line pink fishery in Area 1. Each of these changes is for a species that is designated to be harvested by one gear only and has specific PST provisions. These three new fishery production areas were contemplated in the SCORE process. The SCC also proposed adopting a new fishery production area for Fraser River chum. The CSAB do not concur with this change due to Fraser River chum forming a major part of the harvests and sharing arrangements in Johnstone Straits fisheries and that most but not all of the same fleet's would fish in both new areas. The CSAB view is Johnstone Strait's fishery management should remain at the 20% harvest rate (HR) approach, while Area B & H fleets will continue to seek increased opportunities in Area 29 and any other terminal chum opportunity as per understandings under the current southern inside chum management regime.

Mitigation buyouts/Area re-selection: Discussions were wide ranging including the pros and cons of re-selection, value added implications, changes to species abundances effecting relative sharing arrangements, buying net shares to compensate for reduced troll shares and dropping Area H from any future buy outs. There were also concerns about the current southern BC chinook review and re-negotiations of the chinook Chapter under the PST for possible effects on sharing arrangements into the future. Some feel there will be additional impacts to outside troll fleets during the next 4-5 years. We were advised by DFO that the Mitigation funds had bought out 19% of the troll fleet to date. Given the high degree of uncertainty there was agreement to reconsider mitigation buy out and Area re-selection at the planned 4 year review as part of the broader CSAF review. No changes to sharing arrangements were considered specifically as a result of mitigation buyouts to date and no Area re-selection at this time. Two options were developed to address mitigation buyout and Area re-selection and are described in the recommendation section.

Fleet viability: A minimum individual Area fleet size is a priority requirement in some licence areas and could become a priority in all licence A-H Areas as purchases for First Nations' economic fisheries increase. Fleet viability is important to ensure there are support services to effectively operate any given fleet. Area H provided examples of the recent difficulty of finding packer, ice and other servicing with a smaller and smaller fleet. The Area H fleet currently consists of 77 licences of which 23 are held for First Nations economic fisheries. The Area H representatives feel the level of approximately 50 licences may be at the minimum to make this fleet viable. Individuals making market-based decisions to transfer Area H allocation amongst themselves and to another fleet, which makes Area H allocation smaller, also effect viability. Area C also stated concerns that 51% of Area C licences are owned by First Nations or First Nations' entities. The significance is that now 51% of the Area C allocation may be removed from the gillnet areas and fished in First Nations' economic fisheries in different style fisheries (inland or marine). If such a significant transfer of licences was to occur this would disrupt support services and make the Area C less viable. Only 49% of the Area C fleet is now available for purchase by individual owner operator fishermen (including aboriginal fishers) to be fished in regular gillnet fisheries. Area C believes that DFO should ensure that the gillnet licenced fleet should not fall below 60% or 378 licences – some of which will be owned by First Nations and the rest by individual owner operators. It was difficult to determine during the discussion how to make a specific determination of an exact fleet size for fleet viability but there was broad concern about this issue.

Operationalizing the allocations requires an understanding of the various arrangements that have been made at the local level between the gear types. This is a significant issue for CSAB members in consideration of transfers to First Nation economic fisheries that may not operate as the licence type they were transferred from. Issues include the use of any given % which may have been defined to cover off encounters/release mortalities, bycatch and directed harvests. Bycatch can include incidental release mortalities or both an incidental harvest of a species/stocks to limited numbers and expected retained species/stocks which are important but secondary to the target species. Bycatch should be managed and must be shared between the fisheries to allow every fishery to access its target species. If there is not enough bycatch to meet every fishery's need then an allocation process should take place on the basis of reaching an equitable share of the target species to each fleet that requires it. An examples is Area 6 sockeye are an important bycatch or incidentally harvested species for seines in Area 6 pink targeted fisheries, with seines taking the majority of Area 6 sockeye catch in recent years. However, if there were good sockeye returns to local area rivers permitting directed fisheries (after the seines had their needed sockeye bycatch), different sharing arrangements could occur for the directed sockeye fishery.

Collaborative fishery planning will be a key to the success of these new arrangements. Current salmon management planning has a number of fisheries with separate processes. The CSAB is seeking a fully inclusive process with links between all fisheries to ensure maximum coordination, collaboration and accountability by all participants. Further discussion is required but the complexity and challenges that exist with a number of current management issues and the expected further complexity with added fishery groups/licences, seems like a compelling need to make a formal management process a part of this new broader commercial fishery. The CSAB goal is to minimize the complexity and not add to it with new separate processes. An updated TOR is needed for an expanded commercial salmon advisory board (mandate, roles and responsibilities, membership, structure, etc.). The CSAB welcomes First Nations economic fishery membership. The licences that First Nations communities continue to be fished as Area A-H fleets are represented by existing harvest committees and First Nations representatives can run for nomination to the committees and vote in Harvest Committee members. Funding will be needed for a fully functioning CSAB. The CSAB wants to work with DFO on options such as licence fee increases dedicated to commercial salmon management and understands the recreational advisory board might be seeking the same option. The CSAB strongly supports locally driven processes to the extent possible and should be a key part of the overall process. There are other items to transitioning to a broader commercial management process and the CSAB is looking forward to working with DFO and the First Nation economic representatives to develop this structure.

It is widely understood that various salmon species and stocks co-mingle in their adult return migration which is when they are harvested by all users. DFO and the PST have recognized this by making specific sharing clauses in some Chapters such as Chapter 4 Fraser River Sockeye and Pink Salmon<sup>7</sup>. DFO has also recognized the need for small but acceptable levels of harvest in domestic management of stocks such as the Early Stuart sockeye run component of the Fraser River sockeye and interior Fraser River coho in a broad array of fisheries in the south coast. The allocation principles also need to reflect this reality in how fisheries are managed and the CSAF is operationalized. The management of stocks of concern/conservation stocks is the largest issue facing fishery managers and the commercial fleets, as

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<sup>7</sup> Pacific Salmon Treaty, Pacific Salmon Commission, July 2014

well as other users. Currently bycatch rules, release mortality sharing, etc. is an area that fishery representatives meet with DFO and other user groups in various forums (e.g. IFMP, Barkley Sd. Round table), to work out the best options for that year with the goal of optimizing available TACs. However there is not clear priorities of sharing limiting stocks or species. Limited data on some of these limiting stocks or species also makes setting allocations difficult. The CSAB promotes an overall objective of best use of these fish to optimize all fishery groups target fisheries. The CSAB proposes that annual planning processes should continue to be the forum where all groups come together to make these trade-off decisions and not attempt to allocate these limiting stocks. For these reasons the CSAB does not support the allocation of bycatch percentages and in some cases has designated these situations with an asterisk in the initial allocations table. An asterisk in the table is to recognize that there is the need for some incidental encounters or bycatch to prosecute a fishery on a targeted surplus. Clearly more stock assessment information is needed if someone was to actually make allocations of all species. It is expected there will be opportunities for First Nation economic and Area A-H harvest fleets to work together with DFO to improve stock assessment knowledge. As the stock status for any species improves it is also a goal of all commercial fleets to retain fish rather than release them to reduce the loss due to release mortalities.

There is general CSAB support for each gear type or First Nation economic fishery to determine the best management approach for its share (options may include competitive fishery, individual quotas, etc.). Fishery management approaches will likely vary by fleet and fishery. The CSAB members need further discussion about the mechanism for fleet decisions. DFO will likely also want clarity on the role and authority of commercial representatives to decision processes. Some CSAB members are opposed to ITQ type fisheries (except any present fishery managed on an ITQ basis will be grandfathered in) and others are worried about impacts to fleet viability with transfers between fleets but in the end there was agreement that each fleet had the right to best determine its own management approach. The CSAB supports a fishery with similar rules and equal priority of access to all First Nation economic and Area A-H fleets. No fishery should be allowed such that its operations puts another fleet out of the water.

The CSAB discussed the uncertainty about changes to the commercial fleets and the increased flexibilities proposed by SCC for the First Nation economic fisheries. In keeping with the basic principles of equal priority of access and integration of the First Nation economic fisheries with the existing commercial fleets, that the A to H fleets be provided with the opportunity and option to make the same changes to their licence structures that the First Nation economic fisheries are afforded to be able to access their TAC. Any change in the A to H fleets licences would require Area Harvest Committee approval and licence holder approval, and as the CSAB often have said one size does not fit all, and there is no obligation for any fleet to adopt increased flexibility if their licence holders do not decide to do so. However, given the major significance of some of the proposed changes that the SCC are requesting be made to their PICFI and ATP licences, the Area A-H fleets will likely want to make some of those changes in the future to be able to access their TAC. Most agreed removing the constraints around stacked and married licences would be appropriate given they were designed years ago and may be an impediment to reducing effort<sup>8</sup>. For example, it was noted that an individual with stacked licences (e.g.

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<sup>8</sup> Licence stacking allows vessel owners to combine different gear and area licence eligibilities onto one vessel by permanently "stacking" additional salmon licences from other vessels onto their vessel. Different gear and area licences can be combined on one vessel. However, a vessel may not hold more than one licence for the same area. Married licences generally refer to cases where licence eligibilities for different species (other than salmon and Schedule II) are combined with a commercial salmon

salmon licence in Area F and G) may be willing to relinquish his/her Area G licence but current constraints may not permit them to do so and still retain their Area F licence. Suggestions included relaxing the restrictions on married and stacked licences, getting rid of “stick boats” and allowing more than one licence in an area to be on a boat.

In discussions at the small group forum there was agreement for the need for an evaluation framework to assess all new proposed fisheries. The CSAB like the SCC would like to be part of establishing such a framework with DFO which we would see including provisions for co-ordination with other fisheries, harvest sharing arrangements, transfers, sharing of bycatch, catch monitoring, stock assessment requirements, conservation requirements, gear conditions, etc. Like the SCC proposal the Area A-H fleets will be seeking similar flexibilities to access to more terminal areas in marine waters that were the normal in past years as well as changes in gear and licence rules. Fleets proposing new fisheries should be responsible for sharing/paying any additional costs for stock assessment or monitoring.

Reconstructing an Area A-H licence from First Nation economic fishery: given we did not see that this was likely to occur in the near future there was not a significant amount of time dedicated to discussing this issue. Some initial thoughts though were vessel length and other such conditions will need to be considered and also any changes in the allocations that exist with a licence when it is being proposed for re-construction vs what shares by species it had when it was removed from the Area A-H fleets and would any changes in species shares effect other licence holders. It was decided that if this was likely to occur then the CSAB could help to develop principles for such a transition in the future.

Transfers: There is agree to the principle that each fleet should have self-determination this includes the option of allocation transfers. The CSAB members need further discussion about the mechanism for fleet decisions as well as DFO will likely also want clarity on the role and authority of commercial reps to decision processes. There was concerns raised of the impacts of transfers between fleets as well as annual transfers and the added complications that can add to fishery management and fleet viability. Many of the members who fleets participate in fisheries with quotas have seen issues such accessing small TACs, vessel length restrictions and use of small TAC of one species concurrent with a larger TAC of a different species no longer are DFO issues but ones that is determined by the licence holder. Allowing or not of transfers of shares from non-IQ fisheries is considered a major problem. Fleets that have opted to stay in competitive arrangements do so with the understanding each vessel has the chance to maximize their catch from the total fleet allotment. Temporary leasing of licences shares from inactive licences effects the remaining active licences. Options that can be considered by all fleets and First Nations economic fisheries are needed. Transfers options may be at the individual licence level or at a fleet level if a fleet so decides. Licences that are purchased for the purpose of transfer to First Nations economic fisheries it is agreed have an equal portion of the fleet share. These permanent type arrangements or longer term arrangements (e.g. 5 years) are not seen as an issue and can be built into the fishery plans and do not change annually.

In-season transfers can occur if preseason plans outline the possibilities. Pre-season plans outlining the possibilities must be agreed to by the A-H fleet and the First Nations economic fisheries involved. Pre-season plans outlining the possibilities, rules and mechanisms for all allocation categories (between all licence fleets and First Nation economic fisheries) should be developed by the fleets and First Nations involved. Transfers between fisheries (between marine and marine and between marine and inland)

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licence. For example, the holder of a salmon A licence has “married” his/her licence with a separate licence to fish shrimp or another species

must account for similar stocks and species in order to not effect another fleet's fishery. The same rules apply for upstream and downstream transfers of harvest shares. For downstream transfers First Nations will need to re-aggregate the necessary components to match the stock mix in the intended harvest area. There should be no transfers of bycatch or limiting stocks/species – these are to be used for optimizing harvest by all fleets. Currently there are not management adjustments (MA) required for Fraser sockeye harvests upriver however this needs to occur to ensure the success of both spawning objectives and to meet First Nations food, social and ceremonial objectives. Fisheries that move the sockeye up river need to account for the MA. If similar MA type rules are enacted in other river systems in the future they will need to follow the same principle. It was also discussed that both First Nations economic fisheries and Area A-H fleets should be governed by similar rules/principles.

Uncaught Allocation: Much of the discussion was similar to the consideration of transfers in the paragraph above. In addition the CSAB discussion focused on two main areas. First where there was inadequate effort by a fleet to catch their share or they did not catch their share due to uncertainty in forecasts or changes in run sizes that occurred after the salmon had passed a given fleets fishing area. Second were situations where any given fleet was restricted from harvesting their TAC due to conservation concerns and bycatch species. The CSAB goal is through the new broader fisheries management process and planning with all participants that all fleets will have an improved opportunity to access their full shares. Where the fishery is managed under an ITQ it is expected there will be minimal uncaught TAC and the transfer principles would apply. A three step process was developed and is presented in the Recommendation section.

ESSR: The following wording is taken from the Integrated Fishery Management Plan (IFMP) –“Salmon fisheries are managed with the objective of reaching escapement targets or harvesting a certain proportion of the run. Uncertain forecasts, inaccurate in-season run size estimates and mixed-stock concerns can result in escapement to terminal areas that are in excess of their required habitat or hatchery spawning capacity. In these cases, Excess Salmon to Spawning Requirements (ESSR) fisheries may occur. The Department will attempt, wherever practical, to eliminate or minimize ESSRs by harvesting in the FSC, recreational, and commercial fisheries. It is not the intention of the Department to establish new ESSR fisheries to displace existing fisheries<sup>9</sup>.” The CSAB agrees there should not be planned for ESSR fisheries. Every effort should be made to reduce ESSR situations. This is most likely to occur if all parties are part of an effective collaborative management process. Trade-offs of use of limiting species/stocks and transfer arrangements are key incentives in the annual process to meet everyone's objectives.

## 7 RECOMMENDATIONS

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- INITIAL ALLOCATIONS

The CSAB has developed initial allocations of the commercial total allowable catch (TAC) by 25 fishery production areas by fleet by species. After considering all proposed elements for updating the CSAF including the Mitigation buy down aspect the CSAB was not able to come to a consensus option for setting the initial allocations that cover all fishery production areas. The first option is presented in

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<sup>9</sup> Southern Pacific Salmon Integrated Fisheries Management Plan Summary, Fisheries and Oceans Canada, 2014

Appendix A. These sharing arrangements were for the most part developed early in the process. There were a few allocations in a few fishery production areas that caused more concern and had less overall support at that time and were flagged for further consideration near the end of the process. After the further consideration a few of the contentious areas were resolved however a few were not. Where there was not support within the group to adopt any given change from the January 30<sup>th</sup> allocation table the fleet proposing a change was asked to develop a rationale for their proposal and these are attached in the Appendices for consideration by DFO. Some of the Harvest Committee representatives provided submissions countering any proposed changes, these are also attached in the Appendices. While other representatives verbally presented their views. Each of these proposals will be briefly described.

**Area H is proposing** to increase their overall fleet share to 3.26% of the coast wide SE (Appendix C). Note in the Area H submission they used actual annual preseason planning shares, with preseason forecasts and actual annual licence counts for the preseason calculation and actual catches with actual fleet sizes in their post-season calculations. The actual annual shares and individual years fleet counts are data that were not used by the CSAB in this Phase 3 process as it is looking back and saying what actually happened vs the CSAB used the new initial shares as developed by the group with 2014 fleet sizes in a retrospective analysis of what would the sharing have been both preseason (forecast data) and post-season (actual catches in each area) had the new sharing allocations been in place over the historical time period. Also the Area H calculations were made averaging averages as opposed to averaging over the 4 year period. Using the data set in the Area H submission the 4 year preseason average (2011-2014) would be 2.71% coast-wide SE and actual harvest (2010-2013) average of 2.75%. Using the CSAB developed allocations the Area H shares would be similar to their 2013 and 2014 individual year's allocations but above the preseason 2011-2014 average of 2.63% and the actual harvest 2010-2013 average of 2.90% as per the January 30<sup>th</sup> allocation table. All net fleets strongly oppose this increase see Appendix D and E.

**Area C is proposing** a number of changes (Appendix F). For sockeye Area 2 they propose to change the sharing arrangements from 80% sn/20% gn to 84%sn/16%gn which is designed for bycatch during directed pink and chum fisheries and add a sharing arrangement for any directed fishery after the bycatch needs are met of 25%sn/75%gn. For sockeye Area 3 they propose increasing the gillnet share from 95% to 100% and decreasing the seine share from 5% to 0%. This is an area with very limited fishing over the last 12 plus years.

For pinks in Area 1 they propose changing the January 30<sup>th</sup> table of 75.5%sn / 22.5%gn /2%tr to 80%sn /20% gn.

For coho in Area 1 they proposing changing the January 30<sup>th</sup> table of 12.5%sn /6.5%gn /81% tr to 10%sn / 10%gn /80% tr.

The Area F fleet agreed earlier to increase the combined net share of Area 1 coho to 19% reflecting the retention of coho in 2014 from years of non-retention but do not support any further decreases in the troll share for coho or any other species (Appendix H). Area A Harvest committee indicated verbally they do not support any changes from the January 30<sup>th</sup> table which they felt was populated after good discussion and compromise from all parties.

**Area G is proposing** (Appendix G) the need for Fraser sockeye allocation to be proportionate to TAC. Fraser sockeye have the most variability of all salmon populations and there is a documented history of



varying the sharing arrangements with relative TAC. They are requesting 1-2% at low run sizes and 3-4% at large run sizes. They provide an example for illustration of 0% up to 3 million TAC and then a stepped increase above 3 million. The net fleet's response (Appendix D & E) supported only a Fraser River sockeye allocation of 1% in large run years which is shown in the allocation table Appendix A. Area G also requested an allocation of Barkley Sound sockeye in large return years but this was not supported by other fleets.

They are also seeking 5-10% of Area 3 pinks compared to the allocation of .5%. There was no support from other fleets for a change to the pink allocation.

- **ASSIGNING THE FIRST NATION ECONOMIC FISHERY SHARE**

The CSAB supports the inclusion of First Nation economic fisheries into to the CSAF. CSAB recommends the transfer of licences be based on voluntary commercial relinquishment of existing licences and calculated as a % of commercial share based on 1/current total fleet size and by fishery production area. Also there needs to be an accounting framework that reports annually on numbers of licences purchased and distribution in existing marine Area A-H fisheries as well as First Nations economic fisheries both in marine and inland waters.

There is some concern about the viability of the remaining commercial fleet for support services and industries in coastal areas. A better understanding and potential implications will be known as the First Nation economic fisheries develop. The Area H fleet which is currently at 54 licences excluding licences held for First Nations economic fisheries has strongly indicated they are nearing a minimum viable number.

- **DURATION OF ARRANGEMENTS**

The CSAB recommends the new CSAF be for a period of 5 years with a review after the 4<sup>th</sup> year. A review may also occur for significant circumstances if a majority of the CSAB members agree. Significant circumstances were considered to be events such as a major adjustment of a Pacific Salmon Treaty Chapter harvesting arrangements through re-negotiations or a prolonged major change of a species abundance. If no major issues are identified with any review it is expected that sharing arrangements would be continued with the same review provisions.

- **NUMBER OF FISHERY PRODUCTION AREAS**

Currently the CSAF annual allocations have used 22 fishery production areas. The CSAB is recommending the number of fishery production areas be increased to 25. The three additional areas were all considered in the SCORE report. The additional fishery production areas better reflect current operations of fisheries in those areas. Each of these changes is for a species that is designated to be harvested by one gear only and has specific Pacific Salmon Treaty provisions. The proposed changes are dividing both PST AABM chinook fisheries from inside chinook fisheries in both North Coast Areas 1-5 and WCVI Areas 21-27. The third new area being created is the PST AB line pink fishery in Area 1. In each of these 3 new fishery production areas only a single troll fleet currently fishes. The CSAB has made initial allocations by species and fleets into the new and the redefined fishery production areas.

The CSAB does not support the creation of a separate Fraser River chum fishery production area. A Fraser chum Area would have significant harvests and fleet overlap with the southern inside chum fishery production area. Johnstone Strait's fishery management should remain at the 20% harvest rate (HR) approach, while Area B & H fleets will continue to seek increased opportunities in Area 29 and any other terminal chum opportunity. With regard to assigning a share of Fraser River chum to any licences being transferred to a new First Nation economic fishery we propose the use of the shares from the southern inside arrangement multiplied by the Fraser chum proportions in each fleet fishery.

- **USE OF SOCKEYE EQUIVALENTS**

The use of sockeye equivalents (SE) as a method of evaluating relative sharing arrangements is part of the current CSAF. The CSAB recommends that any future adjustments may consider sockeye equivalents for Area A-H fleets but they would not be bound to only using SE. There is agreement that some form of metric is needed for consideration of any review re-adjustments but whether that will be SE or something else such as CPUE, historical catches, etc. is not defined at this time.

- **MITIGATION FUND BUY DOWN OF TROLL FLEET/ AREA RE-SELECTION**

Option 1 – continue buyout portion of program as is with no Area re-selection. Review in 4 years as part of planned initial allocation review. Provisions should be developed for licence/vessel swaps between Areas with elimination of length restrictions on swaps. This option was supported by all groups except Area H which proposed option 2.

Option 2 – The Area H Harvest Committee representatives have proposed (Appendix C): 1) that the species and production areas which form the basis of the Area H fishery be allocated so as to provide the 77 Area H licence holders with a coast wide (sockeye equivalents) share of 3.26 per cent based on an estimate of preseason harvest over a recent four-year period (2010-2013 or 2011-2014). In consideration of this, the Area H fleet would relinquish any future claim to the Mitigation Fund with the Area H share to be directed at compensating the Area F and Area G troll fleets for future chinook impacts either through licence retirement or the acquisition of salmon fishing privileges. This would also see the practice of area selection or area re-designation cease as it applies to Area H (with the exception of one-for-one exchanges which would not increase the total number of Area H licences in order that the number of Area H licences remain at or below the current 77 count, or 2) if the 3.26 per cent is not possible through allocation, then Area H's share of the Mitigation Fund should be used to buy allocation from other privilege holders which would achieve a similar outcome.

- **ROLE IN FISHERY MANAGEMENT**

The CSAB recommends the development of a new Terms of Reference for an updated commercial salmon advisory board that includes both First Nations economic fishery and CSAB representatives. This new board could have sub-regional and/or local bodies (e.g. North Coast/ South Coast, Barkley SD round table). Terms of Reference should include mandate, membership, roles and responsibilities, management functions, structure, etc. The intent is a collaborative fishery planning process including all commercial parties and DFO.

- **FISHERY MANAGEMENT APPROACHES**

The CSAB supports a collaborative management principle and a collaborative process required to consolidate and co-ordinate the interests of the commercial salmon fisheries (regular A-H and FN economic fisheries) as they relate to policy matters, harvest planning and other issues related to the commercial fishery.

There is general CSAB support for each gear type or First Nation economic fishery that they can determine the best management approach for its share (options may include competitive fishery, individual quotas, etc.). Fishery management approach will likely vary by fleet and fishery. The CSAB members need further discussion about the mechanism for fleet decisions.

The CSAB supports a fishery with similar rules and equal priority of access to all First Nation economic and Area A-H fleets. No fishery should be allowed such that its operations puts another fleet out of the water.

The CSAB supports the development and use of an evaluation framework to assess all new proposed fisheries. The CSAB like the SCC would like to be part of establishing such a framework with DFO which we would see including provisions for co-ordination with other fisheries, harvest sharing arrangements, transfers, sharing of bycatch, catch monitoring, stock assessment requirements, conservation requirements, gear conditions, etc. Like the SCC proposal the Area A-H fleets will be seeking similar flexibilities to access to more terminal areas in marine waters that were the normal in past years as well as changes in gear and licence rules. Fleets proposing new fisheries should be responsible for sharing/paying any additional costs for stock assessment or monitoring

- **MANAGEMENT OF CATCH OF NON-TARGET SPECIES (BYCATCH)**

The CSAB recommends an overall objective of best use of bycatch fish to optimize all fishery groups target fisheries. Management of bycatch and limiting stocks/species will be a key issue of pre-season planning. The process should have a focus on fisheries management considerations for optimizing harvesting allocations for all groups. Incentives to participate in a collaborative management process is key to success of the new CSAF. The CSAB proposes that annual planning processes should continue to be the forum where all groups come together to make these trade-off decisions and not attempt to allocate these limiting stocks.

New fisheries must be based on the same species/stocks proportions unless considered and agreed to by other effected fisheries (e.g. cannot take allocation of 100 sockeye comprised of many stocks then hold fishery on one stock only).

There is the need to develop a principle for transitioning when a bycatch species becomes a target species. Any surplus after bycatch purposes can be allocated according to agreement between fleets and First Nations economic fisheries involved.

Further discussion and documentation between all parties on the principles for utilization of bycatch fish is required.

- **LICENCING ISSUES**

The CSAB is interested in reform of its current licences structure. In keeping with the basic principles of equal priority of access of each fleet's TAC, and integrations of the First Nation economic fisheries and A to H fisheries, any changes to the commercial fishing licences structure that are afforded to the First Nation economic fisheries, should be also be offered as options and opportunities to the A to H fleets, to as great an extent as possible, so as to allow the A to H fleets to also increase their flexibility to make business decision and improve the long term stability certainty, and resilience of the commercial salmon allocation. This reform would encompass all the licence restriction currently applicable to the A to H fleets including being vessel based, area specific, gear specific, bundled species, fleet or individual share based, vessel length restrictive, married , stacked, etc.

- **TRANSFERS**

In-season transfers can occur if pre-season plans outline possibilities. Each fleets/First Nation economic fishery has the right to determine their own arrangements. Pre-season plans outlining the possibilities, rules and mechanisms for all allocation categories (between all licence fleets and First Nation economic fisheries) will be developed by the fleets and First Nations involved. Transfers between fisheries (between marine and marine and between marine and inland) must account for similar stocks and species. Transfers into areas that require management adjustments need to be accounted for in determining TAC e.g. a similar accounting process to current Fraser sockeye. There are to be no transfers of limiting stocks/species with any target stocks/species. Bycatch/incidental harvests are to be shared for the benefit of all fleets. Operation guidelines for pre-season and in-season transfers similar to current IFMP arrangements should be confirmed or as needed to be developed.

- **UNCAUGHT ALLOCATION**

The CSAB proposes a three step process for considerations of uncaught allocations:

First that for fleets fishing under an ITQ type management system the allocation privilege extends from the marine areas to the spawning grounds. To the extent that those fishing privileges cannot be harvested by the fleet(s) that hold them, the fishing privileges may be transferred to other fleets or groups to the extent that there is an interest between the transferors and the transferees. In the event of a catastrophic situation in which fish had to be harvested and there were no willing groups to participate there would be an opportunity for DFO to intervene to avert or limit a potential ecological disaster and create an ESSR fishery.

Second for uncaught allocation that is not harvested by any fleet in the A-H commercial fisheries and where there is no transfer arrangement in effect and the salmon is not harvested due to inadequate effort, uncertain forecasts, inaccurate in-season run size estimates or other non-conservation reasons: efforts will be made to deliver that foregone target allocation firstly to the same gear in another A-H licenced area; secondly, a different A-H gear- type would be given opportunities to harvest the foregone target allocation; then the First Nations economic fisheries. No compensation will have to take place.

Third if the TAC cannot be harvested because of mixed stock, conservation, or bycatch reasons and as a result there is an uncaught allocation, the following can occur:

- If the A-H fishery with the uncaught allocation was already an ITQ fishery, private arrangements can be made to lease the uncaught allocation to another gear or to a First Nation economic fishery.
- If the A-H fishery with the uncaught allocation had fleet quotas, the fleet involved could decide to lease it to another gear or to a First Nation economic fishery.
- If the A-H fleet with the uncaught allocation was in a non-quota fishery, another Area gear or First Nation interested in harvesting this salmon allocation could contact the fleet's representatives and arrange to harvest the salmon with profits to go to conservation or enhancement or back to the A-H fleet or some sharing arrangement as agreed.
- The A-H fleet could harvest its uncaught allocation in an inland fishery.

- **ESSR**

The CSAB does not support the fishery management practice of planned for ESSR fisheries. Every effort should be made to reduce ESSR situations. This is most likely to occur if all parties are part of an effective collaborative management process. Trade-offs of use of limiting species/stocks and transfer arrangements are key incentives in the annual process to meet everyone's objectives.

- **CATCH MONITORING**

The CSAB supports the principle to have accurate, timely and accessible fisheries data, such that there is sufficient information for all Pacific fisheries to be managed sustainably and to meet other reporting obligations and objectives.

- **DUAL FISHING**

CSAB recommends that current DFO policy will continue to apply for requests for dual fishing. CSAB concerns with dual fishing are fairness in all Area A-H fisheries between both vessels with and without First Nations members as operator/crew and also from a conservation perspective if more and more vessels are allowed to retain stocks of concern. If larger numbers of a limiting stock are being retained than would be with non-retention release mortality rates applied there is a high likelihood of the commercial fishery needing to be restricted to meet conservation objectives thus impacting all participants.

## 8 SELECTED REFERENCES

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## 9 APPENDICES

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**APPENDIX A:** CSAB Proposed Initial Allocations by Fishery Production Area, Gear and Fleet, January 30<sup>th</sup>, 2015 option

**APPENDIX B:** Letter from CSAB to DFO dated May 29, 2014

**APPENDIX C:** Area H Harvest Committee Submission

**APPENDIX D:** Area D & E Harvest Committee Submission

**APPENDIX E:** Area B Harvest Committee Submission

**APPENDIX F:** Area C Harvest Committee Submission

**APPENDIX G:** Area G Harvest Committee Submission

**APPENDIX H:** Area F Harvest Committee Submission

**APPENDIX A – CSAB Initial Allocations by Fishery Production Area by Gear and by Species. January 30<sup>th</sup>, 2015 Option.**

ID	Spp	ProdArea	LicArea	4 year (2010-2013)			4 year (2006-2009)			4 year (2002-2005)			Last 12 years (2002-2013)			SCORE	CSAB	Notes
				SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	2009	Jan. 30	
1-sock	sock	1	A	299,925	19.1%	25.0%	682,338	24.9%	25.0%	526,827	19.5%	25.0%	1,509,090	21.5%	25.0%	25.0%	25.0%	
1-sock	sock	1	C	1,263,293	80.3%	74.8%	2,046,714	74.6%	74.8%	2,160,570	80.1%	74.4%	5,470,577	78.0%	74.7%	74.0%	75.0%	
1-sock	sock	1	F	9,251	0.6%	0.2%	16,006	0.6%	0.2%	8,638	0.3%	0.6%	33,895	0.5%	0.3%	1.0%	*	by-catch provision
2-sock	sock	2	A	35,613	88.3%	31.3%	58,770	92.6%	25.0%	83,371	79.8%	25.0%	177,754	85.4%	27.1%	69.5%	80.0%	reflects current sockeye by-catch during pink directed fishery
2-sock	sock	2	C	4,657	11.5%	68.8%	4,681	7.4%	75.0%	20,754	19.9%	75.0%	30,092	14.5%	72.9%	29.5%	20.0%	*potential for re-negotiation of sharing arrangements in the event of a future directed sockeye fishery
2-sock	sock	2	F	77	0.2%	0.0%	1	0.0%	0.0%	299	0.3%	0.0%	377	0.2%	0.0%	1.0%	*	by-catch provision
3-sock	sock	3	A	-	0.0%	0.0%	-	#DIV/0!	0.0%	-	#DIV/0!	#DIV/0!	-	0.0%	0.0%	5.0%	5.0%	
3-sock	sock	3	C	44,731	100.0%	100.0%	-	#DIV/0!	100.0%	-	#DIV/0!	#DIV/0!	44,731	100.0%	100.0%	88.0%	95.0%	
3-sock	sock	3	F	-	0.0%	0.0%	-	#DIV/0!	0.0%	-	#DIV/0!	#DIV/0!	-	0.0%	0.0%	7.0%	0.0%	* potential for future re-negotiation
4-sock	sock	4	B	777,927	56.5%	60.0%	15,039	50.6%	60.0%	461,367	54.2%	57.5%	1,254,333	55.6%	59.2%	59.0%	60.0%	
4-sock	sock	4	D	597,841	43.5%	40.0%	14,681	49.4%	40.0%	337,323	39.6%	38.5%	949,845	42.1%	39.5%	39.0%	40.0%	
4-sock	sock	4	E	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
4-sock	sock	4	G	-	0.0%	0.0%	-	0.0%	0.0%	52,826	6.2%	4.0%	52,826	2.3%	1.3%	2.0%	0.0%	* potential for future re-negotiation
4-sock	sock	4	H	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
5-sock	sock	5	B	5,929,149	59.6%	48.5%	1,581,959	49.2%	47.5%	1,790,357	40.2%	44.9%	9,301,465	52.8%	47.0%	44.0%	48.5%	
5-sock	sock	5	D	1,149,856	11.6%	21.6%	465,322	14.5%	19.3%	598,506	13.4%	13.8%	2,213,684	12.6%	18.2%	38.0%	21.6%	
5-sock	sock	5	E	2,349,857	23.6%	25.1%	773,600	24.1%	22.8%	1,486,763	33.4%	27.3%	4,610,220	26.2%	25.0%	25.1%	25.1%	
5-sock	sock	5	G	4	0.0%	0.0%	177,883	5.5%	1.1%	154,911	3.5%	2.0%	332,798	1.9%	1.0%	18.0%	0.0%	a 1% harvest share to occur in large Fraser River return years only. Reductions to be proportionate from other fleets in those years.
5-sock	sock	5	H	519,814	5.2%	4.8%	217,261	6.8%	9.4%	425,890	9.6%	12.1%	1,162,965	6.6%	8.8%	4.8%	4.8%	
1-pink	pink	1	A	3,687,607	82.1%	75.5%	5,867,466	83.1%	80.0%	9,175,847	83.9%	77.5%	18,730,920	83.3%	77.7%	81.4%	75.5%	
1-pink	pink	1	C	547,609	12.2%	22.5%	982,105	13.9%	18.0%	1,538,876	14.1%	18.3%	3,068,590	13.6%	19.6%	13.5%	22.5%	Skeena sharing 75% sn : 25% gn
1-pink	pink	1	F	255,393	5.7%	2.0%	212,090	3.0%	2.0%	228,041	2.1%	4.3%	695,524	3.1%	2.8%	5.1%	2.0%	
2-pink	pink	2	A	7,554,904	99.1%	86.3%	8,807,453	99.3%	90.0%	12,237,614	98.0%	88.5%	28,599,971	98.7%	88.3%	95.0%	95.0%	
2-pink	pink	2	C	63,102	0.8%	13.8%	54,085	0.6%	10.0%	249,521	2.0%	9.0%	366,708	1.3%	10.9%	4.0%	5.0%	* potential for future re-negotiation
2-pink	pink	2	F	5,833	0.1%	0.0%	5,361	0.1%	0.0%	6,149	0.0%	2.5%	17,343	0.1%	0.8%	1.0%	*	by-catch provisions
3-pink	pink	3	B	6,316,756	96.2%	67.3%	461,699	94.7%	70.0%	410,545	77.8%	67.5%	7,189,000	94.9%	68.3%	82.0%	82.5%	
3-pink	pink	3	D	47,653	0.7%	8.8%	4,858	1.0%	4.0%	23,883	4.5%	4.0%	76,394	1.0%	5.6%	7.0%	4.0%	pink by-catch required for more abundant species
3-pink	pink	3	E	110,069	1.7%	9.8%	250	0.1%	2.4%	21,270	4.0%	1.0%	131,589	1.7%	4.4%	3.0%	3.0%	pink by-catch required for more abundant species
3-pink	pink	3	G	288	0.0%	4.9%	953	0.2%	10.6%	2,678	0.5%	14.5%	3,919	0.1%	10.0%	0.5%	0.5%	*potential for future re-negotiation. Pink by-catch required for more abundant species
3-pink	pink	3	H	88,294	1.3%	9.4%	19,834	4.1%	13.0%	69,134	13.1%	13.0%	177,262	2.3%	11.8%	11.0%	10.0%	pink by-catch required for more abundant species
4-pink	pink	4	B	896,788	90.4%	73.0%	1,034,779	97.7%	73.0%	778,467	81.6%	73.0%	2,710,034	90.2%	73.0%	73.0%	73.0%	
4-pink	pink	4	D	93,466	9.4%	9.0%	23,257	2.2%	9.0%	90,571	9.5%	9.0%	207,294	6.9%	9.0%	9.0%	9.0%	
4-pink	pink	4	E	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
4-pink	pink	4	G	-	0.0%	0.0%	252	0.0%	0.0%	-	0.0%	0.0%	252	0.0%	0.0%	0.0%	0.0%	
4-pink	pink	4	H	1,466	0.1%	18.0%	856	0.1%	18.0%	84,755	8.9%	18.0%	87,077	2.9%	18.0%	18.0%	18.0%	
NEW 5-pink	pink	5	F													100%	100%	AB line pink troll fishery only



ID	Spp	ProdArea	LicArea	4 year (2010-2013)			4 year (2006-2009)			4 year (2002-2005)			Last 12 years (2002-2013)			SCORE	CSAB	Notes
				SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	2009	Jan. 30	
1-chum	chum	1	A	-	0.0%	55.0%	30,800	55.1%	55.0%	218,567	70.5%	53.5%	249,367	66.5%	54.5%	53.0%	54.0%	
1-chum	chum	1	C	8,602	95.1%	45.0%	24,090	43.1%	45.0%	89,849	29.0%	36.5%	122,541	32.7%	42.2%	42.0%	43.0%	
1-chum	chum	1	F	446	4.9%	0.0%	1,039	1.9%	0.0%	1,418	0.5%	10.0%	2,903	0.8%	3.3%	5.0%	3.0%	chum retention on AB line
2-chum	chum	2	A	67,984	62.1%	16.3%	61,965	32.2%	0.0%	45,086	15.4%	22.5%	175,035	29.4%	12.9%	54.0%	55.0%	recent chum non-retention; exploratory fishery allows by-catch of chum
2-chum	chum	2	C	41,514	37.9%	83.8%	130,476	67.8%	100.0%	248,487	84.6%	77.5%	420,477	70.6%	87.1%	45.0%	45.0%	recent chum non-retention; exploratory fishery allows by-catch of chum
2-chum	chum	2	F	1	0.0%	0.0%	-	0.0%	0.0%	8	0.0%	0.0%	9	0.0%	0.0%	1.0%	1.0%	* by-catch provision
3-chum	chum	3	A	540,948	42.8%	55.0%	170,822	21.8%	55.0%	1,876,619	43.9%	53.0%	2,588,389	40.9%	54.3%	40.0%	45.0%	currently chum non-retention
3-chum	chum	3	C	723,766	57.2%	45.0%	612,234	78.2%	45.0%	2,402,782	56.1%	44.5%	3,738,782	59.1%	44.8%	59.0%	55.0%	
3-chum	chum	3	F	-	0.0%	0.0%	4	0.0%	0.0%	145	0.0%	2.5%	149	0.0%	0.8%	1.0%	1.0%	* by-catch provision
4-chum	chum	4	B	1,787,395	66.5%	63.0%	1,536,186	57.4%	63.0%	3,107,955	67.7%	63.0%	6,431,536	64.6%	63.0%	63.0%	63.0%	
4-chum	chum	4	D	426,364	15.9%	19.3%	621,437	23.2%	19.0%	953,680	20.8%	19.0%	2,001,481	20.1%	19.1%	31.0%	19.2%	
4-chum	chum	4	E	298,134	11.1%	12.0%	320,721	12.0%	12.0%	256,731	5.6%	12.0%	875,586	8.8%	12.0%	0.0%	12.0%	
4-chum	chum	4	G	-	0.0%	0.0%	47	0.0%	0.0%	-	0.0%	0.0%	47	0.0%	0.0%	0.0%	0.0%	
4-chum	chum	4	H	177,007	6.6%	5.8%	198,791	7.4%	6.0%	275,025	6.0%	6.0%	650,823	6.5%	5.9%	6.0%	5.8%	
5-chum	chum	5	B	212,065	67.0%	64.9%	242,723	35.9%	70.0%	1,174,298	62.0%	59.8%	1,629,086	56.4%	64.9%	65.5%	65.5%	
5-chum	chum	5	D	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
5-chum	chum	5	E	104,418	33.0%	34.1%	433,273	64.1%	29.0%	720,746	38.0%	39.3%	1,258,437	43.6%	34.1%	33.5%	34.5%	
5-chum	chum	5	G	-	0.0%	1.0%	-	0.0%	1.0%	-	0.0%	1.0%	-	0.0%	1.0%	1.0%	1.0%	* by-catch provision
5-chum	chum	5	H	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
6-chum	chum	6	B	-	0.0%	0.0%	56	0.0%	0.0%	1	0.0%	0.0%	57	0.0%	0.0%	13.1%	0.0%	*potential for future re-negotiation if chum populations rebuild
6-chum	chum	6	D	43,811	97.8%	98.0%	190,181	98.4%	98.0%	484,238	97.6%	98.0%	718,230	97.8%	98.0%	84.7%	98.0%	
6-chum	chum	6	E	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
6-chum	chum	6	G	998	2.2%	2.0%	2,966	1.5%	2.0%	12,037	2.4%	2.0%	16,001	2.2%	2.0%	2.2%	2.0%	
6-chum	chum	6	H	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
1-coho	coho	1	A	59,995	5.3%	12.5%	85,044	11.7%	15.0%	157,055	14.3%	11.3%	302,094	10.3%	12.9%	10.0%	12.5%	sharing arrangements were difficult due to limited recent fisheries
1-coho	coho	1	C	13,326	1.2%	6.5%	19,601	2.7%	3.8%	28,410	2.6%	5.0%	61,337	2.1%	5.1%	10.0%	6.5%	see note above
1-coho	coho	1	F	1,049,703	93.5%	81.0%	624,219	85.6%	81.3%	909,557	83.1%	83.8%	2,583,479	87.7%	82.0%	80.0%	81.0%	see note above
2-coho	coho	2	B	3,901	72.6%	55.0%	17	29.3%	55.0%	162	58.9%	55.0%	4,080	71.5%	55.0%	55.0%	tbd	Currently no directed fisheries in this area. Need to review when future directed opportunity develops
2-coho	coho	2	D	1,169	21.8%	15.0%	19	32.8%	15.0%	36	13.1%	15.0%	1,224	21.4%	15.0%	38.0%	tbd	Principles to be drafted re: how to distribute impacts
2-coho	coho	2	E	87	1.6%	15.0%	11	19.0%	15.0%	58	21.1%	15.0%	156	2.7%	15.0%	0.0%	tbd	
2-coho	coho	2	G	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	tbd
2-coho	coho	2	H	217	4.0%	15.0%	11	19.0%	15.0%	19	6.9%	15.0%	247	4.3%	15.0%	7.0%	tbd	
3-coho	coho	3	B	67	0.6%	0.0%	8,530	49.4%	30.0%	2,357	14.3%	15.0%	10,954	24.6%	15.0%	5.0%	9.5%	
3-coho	coho	3	D	1,851	17.2%	0.0%	4,346	25.2%	7.5%	11,757	71.3%	15.0%	17,954	40.3%	6.0%	4.0%	9.5%	
3-coho	coho	3	E	178	1.7%	0.0%	6	0.0%	0.0%	-	0.0%	15.0%	184	0.4%	3.0%	1.0%	1.0%	
3-coho	coho	3	G	8,690	80.6%	100.0%	4,380	25.4%	62.5%	2,373	14.4%	55.0%	15,443	34.7%	76.0%	90.0%	80.0%	coho taken primarily in offshore fisheries
3-coho	coho	3	H	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	

ID	Spp	ProdArea	LicArea	4 year (2010-2013)			4 year (2006-2009)			4 year (2002-2005)			Last 12 years (2002-2013)			SCORE	CSAB	Notes
				SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	SUM Catch	Catch %	Pre-season	2009	Jan. 30	
1-chin	chin	1	A	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	1.0%		* by-catch provision
1-chin	chin	1	C	7,364	2.3%	4.7%	28,611	8.2%	4.4%	35,924	6.2%	6.5%	71,899	5.7%	5.2%	1.0%		* by-catch provision
1-chin	chin	1	F	314,664	97.7%	95.3%	318,812	91.8%	95.6%	546,552	93.8%	93.5%	1,180,028	94.3%	94.8%	98.0%	100.0%	AABM chinook harvest
2-chin	chin	2	A	6	0.0%	0.0%	-	0.0%	0.0%	12	0.1%	0.0%	18	0.0%	0.0%	2.7%		* by-catch provision
2-chin	chin	2	C	15,867	100.0%	99.0%	15,728	99.9%	96.0%	19,120	93.0%	88.8%	50,715	97.2%	94.6%	77.0%	100.0%	near -terminal fisheries (primarily hatchery origin)
2-chin	chin	2	F	-	0.0%	1.0%	9	0.1%	4.0%	1,442	7.0%	11.3%	1,451	2.8%	5.4%	20.3%		*review potential re-entry of troll into Area 6+7. by-catch provision
3-chin	chin	3	B	300	2.4%	0.0%	13	0.3%	0.0%	27	0.1%	0.0%	340	0.9%	0.0%	1.0%	1.0%	*subject review pending completion of SBC chinook initiative
3-chin	chin	3	D	34	0.3%	0.0%	147	3.9%	0.5%	1,191	5.4%	5.0%	1,372	3.6%	1.8%	10.0%	3.0%	
3-chin	chin	3	E	11,905	96.8%	100.0%	3,618	95.5%	99.5%	18,145	83.0%	83.8%	33,668	88.7%	94.4%	83.0%	90.0%	Directed Fraser chinook fishery
3-chin	chin	3	G	-	0.0%	0.0%	10	0.3%	0.0%	-	0.0%	0.0%	10	0.0%	0.0%	0.0%	0.0%	
3-chin	chin	3	H	59	0.5%	0.0%	-	0.0%	0.0%	2,497	11.4%	11.3%	2,556	6.7%	3.8%	6.0%	6.0%	
4-chin	chin	4	B	1	0.0%	0.4%	12,179	3.2%	4.7%	4,754	0.7%	3.0%	16,934	1.2%	2.7%	1.0%		* by-catch provision
4-chin	chin	4	D	42,296	12.1%	2.2%	52,679	13.7%	10.1%	40,443	6.2%	3.0%	135,418	9.7%	5.1%	1.0%		* by-catch provision
4-chin	chin	4	E	48	0.0%	0.0%	-	0.0%	0.0%	2	0.0%	0.0%	50	0.0%	0.0%	0.0%	0.0%	
4-chin	chin	4	G	307,783	87.9%	97.3%	319,243	83.1%	85.3%	611,874	93.1%	94.0%	1,238,900	89.0%	92.2%	98.0%	100.0%	This is AABM chinook fishery
4-chin	chin	4	H	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	-	0.0%	0.0%	0.0%	0.0%	
Inside (Areas 1-5)	chin	5	A													39.0%		* by-catch provision
Inside (Areas 1-5)	chin	5	C													59.0%	100.0%	by-catch provision + near-terminal directed fisheries (e.g. Skeena)
Inside (Areas 1-5)	chin	5	F													2.0%		* by-catch provision
NEW-WCVI Inside	chin	6	B													5.0%	5%	Area 23 sharing arrangement currently 33.3%SN: 66.7%GN. May need to review
NEW-WCVI Inside	chin	6	D													80.0%		
NEW-WCVI Inside	chin	6	E														75%	Area 25 fishery (e.g Conuma)
NEW-WCVI Inside	chin	6	G													15.0%	15%	w inter troll fishery
NEW-WCVI Inside	chin	6	H													0.0%	0%	

**Excel file provided by DFO with Historical Commercial Harvest Information and CSAB Initial Allocations in Table R3b.**



Historical  
Commercial Salmon

## APPENDIX B

### **CSAB Advice to DFO on Commercial Allocation Modernization: May 29, 2014**

After meeting on May 29, 2014, the CSAB Allocation Working Group agreed on the following advice to DFO:

As the current process concludes, CSAB wishes to recognize the significant progress that has been achieved, in terms of improved understanding and convergence of views, both among CSAB members and in the small group meetings that involved CSAB, DFO and SCC representatives. The discussions have helped to bring CSAB members together, with a focus on the “Evergreen” proposal as a basis for moving forward to resolve some of the key issues in redefining the commercial allocation framework. The CSAB also recognizes the invaluable opportunity in being able to work collaboratively to develop a common understanding that will help to shape emerging First Nations commercial fisheries and contribute to the success of those efforts. Notwithstanding this significant progress, the CSAB notes that PST Mitigation Funds were to be used to modernize the commercial allocation process and meet CSAB objectives for modernization. In CSAB’s view, those objectives have not been fully achieved to date, as the structure/direction of the current process did not provide sufficient opportunity to complete the in-depth discussion required to resolve priority CSAB issues.

The CSAB therefore proposes that with a limited amount of further discussion time, CSAB can easily reach agreement and provide advice on resolving several outstanding priority issues, including:

1. Refine the Evergreen proposal and develop details of this allocation plan.
2. Decide on a fixed initial term for the Evergreen plan (review to follow the initial term).
3. Troll mitigation buy-down and effects on allocation.
4. Area re-reselection (permitted or not).

Further discussion will also provide more clarity and direction on how to deal with more challenging fishery management issues, including ITQs and/or partial fleet ITQs, even if fundamental differences among CSAB members with regard to ITQs are unlikely to be fully resolved. Once CSAB has been able to discuss and resolve the above priority issues, we propose further CSAB meetings to discuss appropriate rules and management for First Nations commercial fisheries, as those relate to the future viability of commercial fisheries. CSAB will be able to contribute more effectively to further discussions with DFO and SCC once it has developed its own coherent internal approach on key issues, including:

- The need for appropriate definition and allocations for ESSR fisheries.
- First Nations commercial fishery rules for all fisheries in common areas (flexibility/fairness issues).
- Temporary leasing of licence shares (e.g. Area C issues)
- Tracking of allocation/transfers
- Monitoring, compliance and traceability.
- Cap on transfers from existing marine commercial fisheries, fleet size & viability.

If time permits, and once CSAB priority issues are tackled, CSAB also welcomes discussion of additional topics that DFO may propose.

#### **Process:**

CSAB will require appropriate funding and support to accomplish these objectives and we propose that Mitigation funds be allocated to fund a contract for an advisor/facilitator with appropriate technical experience, as selected by CSAB, to help with this work.

### **CSAB Advice to DFO on Commercial Allocation Modernization: May 29, 2014**

We propose 6 days of meetings in fall 2014, with the initial 3 days allocated for CSAB meetings with the Advisor/facilitator to resolve the CSAB priority issues identified above. Once CSAB’s priority issues are resolved, the remaining meeting days can be used to discuss the above issues relating to integration of First Nations and marine commercial fisheries. Once CSAB has had the opportunity to resolve these

issues internally, we will be able to contribute more effectively in a continuation of small group CSAB/SCC meetings. CSAB also proposes to consult with constituents on these issues over the summer. The intent would be to wrap up and provide final advice to DFO in time to implement changes in the 2015 fishery season.

## APPENDIX C

### Commercial Salmon Allocation Framework

#### Area H Troll Submission

**DATE:** February 2, 2015

**TO:** Barry Rosenberger, Facilitator, Commercial Salmon Advisory Board ([barryrosenberger@hotmail.ca](mailto:barryrosenberger@hotmail.ca))

Jeff Grout, Regional Resource Manager, Salmon ([jeff.grout@dfo-mpo.gc.ca](mailto:jeff.grout@dfo-mpo.gc.ca))

#### BACKGROUND

This submission is being made on the behalf of the 77 Area H licence holders that fish by troll in Johnstone Strait (portions of Areas 12 and 13), portions of Area 18, portions of Area 29 off the Fraser River mouth; and that fish in the First Nations (FN) Economic Opportunity fisheries (EOF) that may be conducted in the same marine areas or Fraser River systems.

The following chart outlines the current number of licence holders in each of the commercial salmon fleets including licences acquired pursuant to the Pacific Integrated Commercial Fisheries Initiative – Allocation Transfer Program (PICFI/ATP), the Catch Per Unit Effort (CPUE) shares established by the Kelleher Formula, the adjusted CPUE shares after giving effect to the impact of the fleet reduction arising from the Mitigation Fund troll licence retirement program (allocating the benefit of troll fleet reduction proportionately across all fleets), and the coastwise shares (based on sockeye equivalents) derived from the current number of licences and the adjusted CPUE:

	ASA	ASB	AGC	AGD	AGE	ATF	ATG	ATH
<b>Licences</b>	108	168	638	378	390	238	121	77
<b>Kelleher CPUE</b>	0.145%	0.145%	0.027%	0.027%	0.027%	0.041%	0.041%	0.041%
<b>CPUE (Sharing Mitigation Impact)</b>	0.151%	0.151%	0.28%	0.028%	0.028%	0.042%	0.042%	0.042%
<b>Coastwide</b>	16.34%	25.41%	18.05%	10.69%	11.03%	10.08%	5.13%	3.26%

Share (SE)								
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The following chart illustrates the recent historic allocation data for the Area H fleet based on the preseason allocation and actual harvest data<sup>10</sup>:

	2010	2011	2012	2013	2014	2010-2013	2011-2014
<b>Coastwide Share – Preseason (SE)</b>	2.94%	1.82%	1.34%	2.91%	3.40%	2.25%	2.37%
<b>Coastwide Share – Actual (SE)</b>	4.34%	2.24%	0.72%	0.82%		2.03%	

Even with the reduced number of Area H licence holders and the benefits of the Mitigation Fund troll fleet reduction distributed across all commercial salmon licence holders, the Area H fleet, on both a preseason and postseason basis, has been receiving roughly two-thirds of its Kelleher-based troll share. The shortfall was recognized during the Subcommittee on Options for Review and Evaluation (SCORE) process struck by the Commercial Salmon Advisory Board (CSAB) to consider options to address the decline in the commercial fishery and how it might be addressed. In the SCORE report published in March 2008, the Area H share of Fraser River sockeye was pegged at nine per cent at a point when there were 89 Area H licences.<sup>11</sup>

### **Allocation Policy – A New Direction**

The following is drawn from the policy document upon which salmon allocation decisions continue to be guided<sup>12</sup>:

**“To encourage selective fishing:**

- **a portion of the total available commercial catch will be set aside for existing commercial licence holders to test alternative, more selective harvesting gear and technology; and,**

<sup>10</sup> The data was sourced from information provided by DFO which is appended.

<sup>11</sup> Salmon Management Reform, SCORE Report, Diamond Management Consulting Inc., March 1, 2008.

<sup>12</sup> AN ALLOCATION POLICY FOR PACIFIC SALMON A New Direction: The Fourth in a Series of Papers from Fisheries and Oceans Canada, October 1999.

- **over time, commercial allocations will favour those that can demonstrate their ability to fish selectively.”**

“Given the mixed stock nature of the Pacific salmon fishery, more selective fishing practices are required in order to maximize the harvest of target species, in particular sockeye, pink and chum, and minimize the by-catch of other species.”

“Over the longer term, target allocations for seine, gillnet and troll gear will be adjusted to reflect the relative ability of each gear type to harvest selectively through modification of existing gear and fishing operations.”

The Area H fleet has been on the forefront of the implementation of sustainable harvesting practices and now boasts what is arguably the “cleanest” commercial salmon fishery on the coast. The Area H fleet has accomplished this by having the lowest bycatch incidence rate and bycatch release mortality (of 10 per cent as established by scientific study) of the three gear types. The impact on species of concern (which include coho, sockeye and chinook salmon) is significant when compared against the 25 per cent release mortality for the seine fleet and the 75 per cent release mortality for the gillnet fleet.

In response to the amended direction of the fishery prescribed by the then Minister of Fisheries in the July 16, 2007 launch of PICFI, Area H implemented a number of industry-leading demonstration fishery projects which:

- promote the use of clearly defined catch shares through individual transferable quota (ITQ) fisheries that have improved manageability and fishery viability;
- enhance management control of and conservation performance in the fishery through the adoption of 100 per cent monitoring of these ITQ fisheries; and
- increase the ability of harvesters to work cooperatively with other fleets (and ultimately other sectors) to harvest available surpluses and to take on greater responsibility for control and monitoring of the fishery.

The Area H Harvest Committee has proposed that its fleet explore and assess traditional and historic Area H fisheries that may have been suspended due to resource constraints or lack of participation. The structure and management of such fisheries would be established in cooperation with the DFO resource managers and biologists with the scientific assessment required to confirm the abundance and mix of the target stocks supported by the “Use of Fish” funding arrangement provided by the Area H fleet share.

The Area H and Area B seine fleets were the first to enter into inter-fleet fishing privilege transfers and the Area H Harvest Committee recently proposed extending this demonstration program to evaluate the transfer of fishing privileges between and among other interested commercial salmon fleets, user



groups and resource stakeholders. This could involve incorporating alternative catch monitoring and traceability methods which promise comparable or better data, lower cost and enhanced compliance, all of which are in line with the direction that progressive fisheries are being taken. The first step contemplates a demonstration fishery which would allow for the voluntary transfer of pink and sockeye salmon fishing privileges in South Coast and Fraser River areas between Area H licence holders and participating FN EOF.

Given the effort being made by the Area H fleet to ensure the economic viability of the fishery and optimize the value of the resource through the adoption of sustainable fisheries practices and onboard value-add processing, the Area H fleet expects to be treated reasonably in the modernized allocation framework. The nature of the fishery, the capital investment required, and the operating costs incurred by the Area H fleet, support the provision of a CPUE share which is commensurate with that provided to the other troll fleets. This is an opportunity to demonstrate that those who embrace the enhanced compliance and monitoring practices that are the foundation of selective fishing will, in turn, receive a fair share of the resource.

## **Recommendation**

The Area H Harvest Committee representatives have proposed that the species and production areas which form the basis of the Area H fishery be allocated so as to provide the 77 Area H licence holders with a coast wide (sockeye equivalents) share of 3.26 per cent based on an estimate of preseason harvest over a recent four-year period (2010-2013 or 2011-2014). In consideration of this, the Area H fleet would relinquish any future claim to the Mitigation Fund with the Area H share to be directed at compensating the Area F and Area G troll fleets for future chinook impacts either through licence retirement or the acquisition of salmon fishing privileges. This would also see the practice of area selection or area redesignation cease as it applies to Area H (with the exception of one-for-one exchanges which would not increase the total number of Area H licences) in order that the number of Area H licences remain at or below the current 77 count. As outlined above, the Area H Harvest Committee intends to further extend fishing privilege transferability, exchange and trading in order to maximize the value of its fleet share.

Alternatively, the Area H Harvest Committee proposes that the Area H share of the remaining \$18 million Mitigation Fund which approximates \$3.2 million (based on 17.7 per cent or 77 Area H licences of the total 436 troll licences) be used by the Area H fleet to acquire salmon fishing privileges from other fleets in the same fashion as PICFI/ATP continues to procure fishing privileges from the commercial sector for transfer to the FN. This would enable the Area H fleet to acquire the salmon fishing privileges of 40 to 50 Area D or Area E gillnet fishing licences which would represent 1.08 to 1.35 per cent of the coast wide commercial salmon share (based on sockeye equivalents).

## **Appendix**

**Historic Commercial Salmon Allocation**  
**Pre-season Allocation Values and Actual Outcomes**



## APPENDIX D

Area D Harvest Committee

Area E Harvest Committee

Monday, Feb 2, 2015

To the CSAB,

Attention Barry Rosenberger,

Re: Defined Share Table - unresolved shares for Area B, D, E, G and H

The following letter is in response to the request of Barry Rosenberger for written submissions to substantiate the positions of the Area D and Area E Harvest Committees regarding the outstanding unresolved B-H shares. This written submission is in line with our verbal arguments on this issue for the past two years, including the final CSAB- CSAF session.

We have heard from the Area H troll fleet that the share of Fraser sockeye TAC (6%) that was allocated to the trollers in 2014 is an appropriate number to use moving forward long-term. We whole-heartedly reject this notion. The 2014 Fraser forecast was one of the largest sockeye forecasts in history. This large Fraser sockeye forecast helped to counterbalance the large chinook catches in Area F and G, and therefore on a one-year basis only, it was fair and appropriate to allocate some Fraser sockeye to the troll fleet. If the pre-season allocation meeting of 2014 had been conducted with an average Fraser sockeye TAC as the forecast, the Area H share of the TAC would have been substantially lower, and the Area G share would have been zero. If we had gone into last year's allocation meeting with the instructions to fix allocations for 4 years, the net fleet would never have agreed to a 6% fixed share for the south coast trollers. Furthermore, the 2014 offer from the net fleet was 5% for H, and 1% for G, it was through internal troll negotiation that the shares were changed to 5.5% and 0.5% in 2014. This request to increase H and G shares in the last session is inflammatory and clearly an inflated bargaining position to take advantage of the current time limitations to extract the maximum amount of fish from the net fleet.

The history of how we got here is clear and well documented. Under the existing allocation policy rules, the shares of each A-H fleet are manipulated yearly to achieve "as close as possible" coast wide gear shares of 19% troll, 41.5% seine and 39.5% gillnet (or 40:38:22 before the recent troll buyback). To achieve these shares as close as possible would have required giving Area H zero fish on many years that had low Fraser sockeye TAC, because the sockeye equivalents from the good chinook fishery in Area F and G take up all the Troll share of 19% (or 22%) leaving no mathematical justification to allocate any fish at all to Area H, unless there is a large Fraser sockeye TAC. This mathematical result of zero fish has been rejected by the various net fleet representatives at the allocation meetings, and we have instead adopted the concept that no one should be left on the beach if possible, and that the south coast net fleets would forgo some of their allocation to keep Area H fishing. This was the only source of Area H allocation for sockeye, pink, and chum in many years in the past, and will be the case for many of the future years as well, if we don't finish the current CSAF process. Since the current allocation policy doesn't mathematically generate any shares for Area H on many years, we needed to use something

else to generate a number larger than zero. The Area D and Area E Harvest Committees have both supported the concept of “gifting” allocation from the Area B seine share and the Area D and E gillnet share to keep Area H off the beach, up to an appropriate amount that is no more than what an Area E or Area D would get. This was seen as “fair” in the eyes of the gillnet fleet, because although we do not want anyone to be on the beach, it was unreasonable to ask a gillnetter to give up fish to a troller when it would result in the recipient making more money than the giver.

We feel that the current Area H share of 4.8% of the Fraser sockeye TAC is the maximum that the net fleet should be asked to give up to keep the Area H troll fleet off the beach. In the future the chinook fishery in Area F and G could diminish in value, and if this is combined with a stronger Fraser sockeye fishery it could result in the coast wide troll share falling below the 19%, or whatever the appropriate number is after the buyback is finished. If this happens then the troll share of Fraser Sockeye may need to be increased. That is why there is a review period built into the Allocation Framework, and this future possibility should not be used to influence the initial allocations on the table.

Area G has achieved great success in recent years with the strong abundance of chinook and high prices. Furthermore the troll fleet has been reduced considerably in the ongoing 30 million dollar troll buyback. The abundance index of AABM Chinook has increased by a much larger percentage than the 30% reduction in catch that was negotiated. Nevertheless, even though it is not mathematically justified, we feel that Area G should have some access to Fraser sockeye so they can mount a fishery on a year with exceptionally high Fraser sockeye returns. An allocation of 0.5% of the Fraser sockeye TAC will allow Area G to mount an appropriate sized fishery. To this end, the south coast gillnet fleet is offering to reduce their share of Fraser TAC by 0.2% (the rest of the Area G share could come from Area H, or Area B). This reduction will be split, 0.1% from Area D, and 0.1% percent from Area E.

These reductions in gillnet shares are not meant to be taken as beginning negotiation positions, these are the maximum amount of fish that will be conceded by the gillnet fleet in the south coast. Sometimes the regulator decides to take a central position on a dispute such as this. If that was to happen in this case, and the Area H share is increased above 4.8%, then it is paramount that the Area H over-generous share of Fraser River pink and chum be substantially reduced and transferred to the net fleet. For instance Area H enjoys 10 percent of the Fraser pink run for only 74 licences, whereas the Area D and Area E fleets combined have 772 licences and are only allocated 7% of the Fraser pink TAC. This means that currently an individual Area H licence has 1300% more Fraser pinks than an individual Area E or D licence. As well as the over-generous pink share, Area H currently enjoys 50% more Fraser chum TAC per licence than a south coast gillnetter. Any increase in the Area H sockeye share will mandate a reduction in Area H chum and pink shares.

For south coast gillnetters, we need every little bit of our sockeye allocation to get in the water on years of low Fraser TAC, because of the large size and impact of our fleets, especially when we consider how the run is now managed by individual stock groupings. In many scenarios, getting an opening or not getting an opening could be determined by a few thousand sockeye. It is critical that we do not give up any additional Fraser sockeye TAC and risk our already endangered openings on years of low or medium Fraser TAC. Any further allocation that is given to Area H could threaten to eliminate a possible Area D or Area E opening. When we succeed in planning fisheries that get the south coast gillnetters in the water, we provide income for 400-600 active fishermen and their deckhands, as well as for the large packing and processing that accompanies such an opening. Fish that moves to the Area H fleet is only

shared between their 77 licences, either leased out to the seine fleet, or fished by their 20-30 actively fishing vessels.

A last minute request for a share of Barkley Sound sockeye TAC was tabled by Area G during the final session. There is no mathematical justification for Troll access to Barkley Sound sockeye. The Area G catch of chinook and coho already exceeds their coast wide allocation shares. There is also no “fairness” justification for Troll share of Barkley sockeye. This is not the same situation as the Fraser where the TAC might grow and shrink by tenfold. Even at its largest abundance, Somass sockeye TAC is relatively modest and will never grow high enough to overshadow the extra chinook and coho that are caught by the troll fleet like the Fraser TAC occasionally does. Any allocation of any Barkley Sound sockeye to Area G troll will disrupt the very successful Barkley Sound Harvest Table, which has in recent history successfully managed the harvest of Barkley Sound sockeye allocations among the First Nations, Recreational, and Area B and Area D.

Sincerely,

Ryan McEachern

Area D Harvest Committee

Darrel McEachern

Area E Harvest Committee

## APPENDIX E

# Area B Harvest Committee/Area B Seine Society



*Representing British Columbia's south coast Seine Fleet*

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*'brailing & sorting salmon  
- selective Seine fishing'*

February 4, 2015

Mr. Barry Rosenberger – CSAB Facilitator to the CSAF

RE: Area B - Final Submission to CSAF Process

On January 28, 2015 the CSAB concluded the '2<sup>nd</sup> Round' of the Modernization of the Commercial Salmon Allocation Framework (CSAF). This was not only the conclusion of a 1 ½ year process but was the culmination of years of frustration of having to deal with an Allocation formula that provided the commercial salmon fleet with little more than frustration.

### **The Kelleher Formula – the Problem Formula**

It had been broadly acknowledge by all parties that the Kelleher Formula was an unworkable Allocation formula and that recognition was the genesis of the call for the Modernization of the Allocation Framework process.

- a) Imbalances – overages/underage's in stocks, which Kelleher prescribed to be moved and shared to maintain balanced allocations, in accordance with a pre-set formula, could neither be accessed nor moved because of geographical licencing restrictions. Yet in past years, following the 'letter of the Kelleher formula', (as an example) shares of stocks in the South were transferred from one gear-type/group to another gear-type/group to balance/compensate a shortfall to the same gear-type in the North. This would result in no compensation to the Northern gear-type, who was short of allocation, but penalized an 'innocent party' in the South.
- b) A more perennial problem had been the allocation overages to the 'Troll share', created by the abundance of chinook available to Areas F & G, that could not be re-allocated, shared or accessed by the 'net fleet' because of the International Treaty.
- c) Some groups maintained that the sockeye equivalent (SE's) formula penalized those that strived to add value by self-processing at sea, although the net fleet believes that supply and demand,

selling to niche markets and the necessity to be self-sufficient were more likely the influencing factors that determined price and motivation.

### **The CSAF Process**

The main objective of the 2<sup>nd</sup> Round, as stated in the CSAB 'Advice to DFO' - dated May 29, 2014, was to affirm and fine tune the Evergreen Model – which was identified, by most participants, as:

- a) Assessing, identifying and affirming 'the traditional' shares of the 'traditional' stocks in the Production Areas normally accessed by each harvest group in their annual fisheries.
- b) That the perceived 'fine tuning' of shares was identified as 1) minor adjustments to some 'traditional shares' 2) describing and assigning shares of stocks that have not been accessed in recent years (10 years or more), usually because of conservation concerns (coho being one), so that an assigned share/division could be recognized at some point in the future when those stocks, presumably, become accessible again.

However, at the end of process on January 28<sup>th</sup> there were still a number of allocation-shares in some of the Production Areas that remained unresolved or disputed. Representatives of those Harvest Groups, which had outstanding issues, (identified primarily as requests for a larger share), were invited to provide submissions to make their final arguments.

Although Area B did not have any aspirations to increase its share beyond what had been identified as its 'traditional share', Area B does feel compelled, at this time, to affirm our position on any requests from Area H and Area G to have their allocation shares increased – Area B does not support or agree with any increase in Area H and G's allocations beyond what was identified at the December 2 – 3 session.

### **Area H – Increased Allocation Share**

At the December 2-3 session, Area H's Fraser sockeye share was pegged at 4.8%. Area B believes that this percentage, (4.8% - Fraser sockeye), to not only be fair and in line with their traditional share but that it does also factor in the reduction of 14 licences to their fleet through the Mitigation buyback. Since that time Area H has persistently argued that their share should be significantly larger. To support this position Area H has relied on using the 'Historic Kelleher data'. This data incorporates 'annual overages' that could never be shared and even proportionally averages the 102 Troll licence reduction across all eight licences groups, further perpetuating a biased argument. Additionally Area H has asserted that their post-season catch outcomes have been far less than their pre-season allocations. Unfortunately, given the vagaries of the south coast fisheries over the past decade, Area H's outcomes have generally been no different than that of the net fleet.

What isn't factored into this analysis, nor has ever been included in the Kelleher formula, is the fact that Area H Troll prices/SE's, (which Area H claims to be double that of the net fleet), are the exactly the same as those applied to the net fleet. Obviously negating any perception of a 'value added penalty'.

Area H has emphatically stated that they do not wish to see their fleet get any smaller than the current 77 licences and for this reason they have indicated that they wish to withdraw from any further participation in the Mitigation Buyback program. In exchange for the withdrawal from this program they

have requested that there not be any further Licence Reselection or licence re-designation through 'licence stacking'. Area B fully supports this proposal as being logical as it provides a realistic outcome for maintaining their fleet size at its current level.

### **Area G**

Area G's annual allocation has consistently exceeded their proportionate share of the coast-wide Troll allocation. Even with the Mitigation-dictated 30% reduction to the WCVI commercial chinook allocation Area G's share still remains above that benchmark. In 2014, the other south coast commercial 'net' groups (B,D,E) did recognize that if the Fraser sockeye came back as forecast it was possible that Area G would fall below their proportionate allocation and consequently it was agreed to allocate Area G 1% of the Fraser sockeye. It was again agreed, on January 28, that this 'temporary allocation', (of 1%), should be extended to Area G on years of extremely high Fraser sockeye abundance. No determination of what "extremely high abundance" was made, however, it would be assumed that at the very least that it would be in the range of the 2014 forecast of >20 million. Area B supports this allocation, as stated, subject to future review.

Additionally, Area G requested a 2% share of Barkley sockeye. At this point, with Area G's allocation remaining consistent with previous years and with ~\$18 million remaining in the Mitigation Buy-back account, Area B does not see any justification for this allocation request.

On behalf of the Area B Harvest Committee,

Chris Ashton, Executive Director



**APPENDIX F**

Area C Harvest Committee Proposal

Submitted by: Joy Thorkelson

February 5, 2015

Area C provided two documents the first is displayed as follows and the second is a excel spreadsheet attached at the end of this appendix.

The Seine Gillnet Troll Kelleher for the NORTH COAST is 37% seine / 40% gillnet / 23% troll

<b>A</b>	<b>C</b>	<b>F</b>	<b>Total</b>	
108	630	238	976	# Licences
<b>68.1%</b>	<b>12.7%</b>	<b>19.2%</b>	<b>100.0%</b>	<b>Relative Catch per Licence (%)</b>
34,177	6,374	9,636	50,187	Catch per Licence
3,691,168	4,015,478	2,293,354	10,000,000	Allocation Values (SE's)
<b>37%</b>	<b>40%</b>	<b>23%</b>		<b>Kelleher North Coast Allocations</b>

<b>37%</b>	<b>40%</b>	<b>23%</b>	<b>Kelleher North Coast Allocations</b>
62%	27%	11%	Kelleher South Coast Allocations
40%	38%	22%	Kelleher Coast Wide Allocations

The north coast seine/gillnet split is **Seines 48% and Gillnets 52%** which I used to balance to because it is difficult to impact troll allocations

The "red" column (Table 6) gives seines and gillnets a 45/55 split which is the same as the average over the past 12 years, the same as the 'initial' CSAB allocations, and because I have taken some coho away from the trollers (10/10/80 areas 1-10) the troll share has gone down from 33% over the past 12 years to 31%. I could have changed the allocations around to more closely meet Kelleher but that would mean changing things greatly from historical allocations.

Based on Table 6		
A SE	644,407	31%
C SE	787,932	38%
F SE	658,386	31%
Total	2,090,725	
seine45%	gillnet55%	

We include in the allocation calculation, sockeye caught in the now-infamous Area 6 fishery. However, in the formal CSAB sheet for presentation to SCC and DFO we would like the sockeye Prod Area 2 to be demarked with asterisks in each gear's box – and then a notation that if there was a surplus to seine and gillnet bycatch needs, a targeted fishery could take place. If the targeted fishery on sockeye took place, the allocation on that targeted fishery only (seine and gillnet bycatch not included) would be split on a 25% seine, 75% gillnet basis.

Spp	ProdArea	LicArea	"Table 6"		
sock	1	A	25.0%		
sock	1	C	75.0%		
sock	1	F	*		<b>Directed</b>
sock	2	A	84.0%	<b>Bycatch</b>	25%
sock	2	C	16.0%		75%
sock	2	F	*		
sock	3	A	*		
sock	3	C	100.0%		
sock	3	F	*		
pink	1	A	80.0%		
pink	1	C	20.0%		
pink	1	F	*		
pink	2	A	95.0%		
pink	2	C	5.0%		
pink	2	F	*		
chum	1	A	54.0%		
chum	1	C	43.0%		
chum	1	F	3.0%		
chum	2	A	54.0%		
chum	2	C	45.0%		
chum	2	F	*		
chum	3	A	45.0%		
chum	3	C	55.0%		
chum	3	F	*		
coho	1	A	10.0%		
coho	1	C	10.0%		
coho	1	F	80.0%		
chin	1	A	*		
chin	1	C	*		
chin	1	F	100.0%		
chin	2	A	*		
chin	2	C	100.0%		
chin	2	F	*		

chin	5	A	*
chin	5	C	100%
chin	5	F	*

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Kelleher planned  
and results.xlsx

## APPENDIX G

# AREA “G” submission

## Chinook

As per the IFMP for southern AABM Chinook. 98% by table R3b.

As for the inshore, could not find the allocation table, but I thought I saw 20% somewhere. That may be available only in terminal areas, but should be able to access.

## Coho

With things the way they are these days with risk averse management, getting any coho before September 10 is almost impossible, other than small by-catch numbers, after the interior Fraser coho are past we should be able to fish to maximum yield outside beach corridor. No set amount, as many until say October 31. Table R3b shows from 80-100% of allocation, most caught in offshore areas in the September, October fisheries

## Sockeye

A minimum of 1-2% in years of lower abundance to cover by-catch in other fisheries (Fraser pinks), with the ability to increase up to 3-4% on years of high abundance (2010, 2014)

In previous years, it was always recognized that Fraser Sockeye were an anomaly and needed to be dealt with separately. Data shows that harvest can range from less than 1 million fish to surpluses over 10 million (data source DFO Jan 2015).

This was resolved by having a stepped sharing arrangement that rejigged opportunities depending on run size in season.

Example for modeling purpose only:

TAC below 3 million: Gillnet, Inside Troll and Seine

TAC above 3 million: add in Area G. Shares between other groups alter to maintain equitable distribution

Example- no significant abundance for 3 years, no Area G fishery, compound opportunity in years of higher abundance. (Area G 1% 2008, 2009 no fishery, 2010 large fishery up to 3%).

Area 23, this only happened years ago when Area “G” had years of no Chinook or coho access, and was used for a catch-up mechanism. Don’t have any percentages, but refer to 2007&2008 post season catch table. (Table R3a)

## Pinks

Not sure what percent, 5-10% of TAC with enough sockeye by-catch. Don’t know how much participation there will be, but need the ability to go.

## Chum

Along with the fall coho, should be open access in the outer areas along with opportunity in terminal areas, (Nootka, Esperanza).

Compiled and submitted by Mike Wells on behalf of the Area "G" harvest committee.

## APPENDIX H

### Area F Harvest Committee Submission

It was our understanding that any Area NOT in agreement with the shares identified on the spread sheet presented at our meeting on January 28th needed to submit what they thought was wrong with this sharing arrangement with supporting reasons why. We do not remember whether those not requiring any change needed to respond to these submissions but we error here on the side of caution and respond.

Area F feels that, in the North, the shares identified on the spread sheet presented January 28th were both fair and reasonable given the history and new potential realities of the coming chinook conservation concerns. I repeat, the only reason Area F is over their Kelleher share is NOT the result of F doing exceptionally well but rather the facts that sockeye and chum returns have been lower and access has been challenged. This along with the pink prices has caused the nets to be below Kelleher and the troll to be above. Even a slight increase in pink price will see the seines back to Kelleher. Dealing properly with ESSR fish would see the gillnets there too. What the next five years will produce is unknown.

As discussed at length in our CSAB meetings we are locking ourselves in for a five year period with a four year review. Therefore we must not only look back but also look forward in the hazy crystal ball and design what is potentially reasonable for this time frame. Chinook catch could look much different over the next five years as opposed to the last decade.

Area F agreed to move 19% of its coho to the nets as a by catch to ensure that they could carry out their harvest of other stocks of abundance. Historically it shows that this is a percent higher than what has been needed. We agreed with this but do not agree with any additional coho shares to the nets nor a targeted coho fishery by the nets.

John Hughes / Ron Fowler