

BRIEFING NOTE FOR DECISION

DATE: September 1, 2022.

PREPARED FOR: Honourable Josie Osborne, Minister of Land, Water and Resource Stewardship.

ISSUE: Seeking decision regarding an invitation from Fisheries and Oceans Canada to jointly participate in a consultation process on west coast fisheries licensing.

RECOMMENDED OPTION: s.13; s.16
s.13; s.16

BACKGROUND:

- FOPO studies and reports on matters related to the federal role in the management of Canada's fisheries and the safeguarding of its waters.
- The Committee can study or report on matters referred to it by the House of Commons, or on topics the Committee itself chooses to examine related to DFO, Freshwater Fish Marketing Corporation, Atlantic fisheries License Appeal Board and Pacific Region License Appeal Board. It is a permanent Committee.
- In 2019 the Committee prepared the *West Coast Fisheries: Sharing Risks and Benefits* report (the FOPO Report). The FOPO Report contains 20 recommendations (Appendix 1) to DFO with potentially significant changes to the current commercial fisheries licensing and quota regime in British Columbia (BC), as well as other recommendations aimed at improving transparency and accessibility to fishing resources. The report was re-tabled by the Committee in 2020.
- In addition to FOPO members, Parliamentary Secretary Fin Donnelly participated in preparing the FOPO Report in his previous role as a federal Member of Parliament.
- s.16

DISCUSSION:

Various groups in BC provided input to the FOPO Report and believe reforms to Pacific Fisheries licencing policies are needed to ensure that benefits of fisheries resources reach coastal communities. They support DFO's Atlantic fishing policies, which emphasize owner-operators (a fishing license owner must be the person operating a fishing vessel) and adjacency (benefits of a resource must be given to those communities adjacent to it).^{s.13}

s.13

(Appendix 2 – differences between the east and west coast licence / quota systems).

s.16

s.16 At a February 2022 FOPO session DFO was asked by a committee member what actions/consideration have been given to the recommendation to date. DFO responded by noting the 2021 release of the *Comparative Analysis of Commercial Fisheries Policies and Regulations on Canada's Atlantic and Pacific Coasts* report; analysis of the technical requirements associated with

setting up a licence and quota registry that would be publicly available; early public engagement; an examination of what further kinds of surveys or data collection on socio economics is needed; and, an expectation to be going out and initiating larger or broader engagement with external groups about FOPO's recommendations in the coming months of 2022.

s.16

s.16 Of the 20 recommendations, three specifically suggest where DFO could work with the Province, including:

- Discussing a model for a loan board (similar to the one run by the Province of Newfoundland and Labrador) to support harvesters' intent on purchasing licences and/or quota to maintain or modernize existing vessels or to purchase new ones;
- Developing strategies to expand value-added fish processing in BC and the recapture of benefits from processing in adjacent communities; and,
- Seeking provincial participation in a new policy framework through a process of authentic and transparent engagement with all key stakeholders.

Elements BC's Wild Salmon Advisory Council (WSAC) recommendations related to Goal 2: Protect and Enhance Economic, Social and Cultural Benefits to BC Communities from Wild Salmon and Fisheries (Appendix 3) were also reflected in FOPO report. Since the FOPO Report's release in 2019, many groups have met with Minister Popham (the then Minister responsible for fisheries in BC) and Parliamentary Secretary Donnelly requesting provincial support in encouraging DFO to act. Many also noted a sense of fatigue with the delay. To date the Province has publicly indicated its appreciation for the effort that went into both the submissions to FOPO and the FOPO Report itself, and its commitment to continue analyzing the recommendations and working with DFO Pacific Region as appropriate.

s.13

OPTIONS:

s.13; s.16

Attachment(s):

- Appendix 1: List of Recommendations from the 2019 FOPO West Coast Fisheries Report
- Appendix 2: Differences between East Coast and West Coast Licence / Quotas Systems
- Appendix 3: WSAC Goal 2 Strategic Recommendations

Assistant Deputy Minister

*James Mack
Water, Fisheries and Coastal
Policy and Planning Division
778 698-3290*

Alternate contact for content:

*Mike Turner
Fisheries, Aquaculture and Wild
Salmon Branch
778 698-3129*

Prepared by:

*Rebecca Wardle
Fisheries, Aquaculture and Wild
Salmon Branch
236 478-2417*

LIST OF RECOMMENDATIONS

As a result of their deliberations, Committees may make recommendations which they include in their reports for the consideration of the House of Commons or the Government. Recommendations related to this study are listed below.

Recommendation 1

That Fisheries and Oceans Canada maintain the limited transferability for non- directed catch, which is a widely supported system for ensuring that non- targeted groundfish that is caught can be sold and tracked for conservation purposes.

Recommendation 2

That based on the principle that fish in Canadian waters are a resource for Canadians (i.e., common property), no future sales of fishing quota and/or licences be to non-Canadian beneficial owners based on the consideration of issues of legal authority, and international agreement/trade impacts

Recommendation 3

That Fisheries and Oceans Canada permit the separation of stacked (or “married”) licences for sale by the licence owner to divest some or all of their licences in the sole intent of facilitating existing harvesters and new entrants to become owner-operators.

Recommendation 4

That, to increase the transparency of quota licence ownership and transactions, Fisheries and Oceans Canada determine and publish, in an easily accessible and readable format, a public online database that includes the following:

- **The beneficial holder of all fishing quota and licences in British Columbia, including penalties for failing to accurately disclose the holder of fishing quota and/or licences, and that Fisheries and Oceans Canada work with Finance Canada to achieve this goal; and,**
- **All sales or leasing of quota and licence holdings be reported and made public by Fisheries and Oceans Canada, including buyer, seller and sale/leasing price.**

Recommendation 5

That Fisheries and Oceans Canada prioritize the collection of socio-economic data for past and future regulatory changes and make this information publicly available.

Recommendation 6

That Fisheries and Oceans Canada develop a comparative analysis of the East Coast and West Coast fisheries in regard to regulations with a view to devising policy that would level the playing field for independent British Columbian fishers.

Recommendation 7

That Fisheries and Oceans Canada undertake discussions with the Province of British Columbia to explore the establishment of a model for a loan board to support harvesters' intent on purchasing licences and/or quota, to maintain or modernize existing vessels or to purchase new ones.

Recommendation 8

That Fisheries and Oceans Canada, with regard to West Coast commercial fisheries, provide financial incentives to independent ownership of licences and quota vs. corporate, overseas or absentee ownership. This could include tax incentives; a shared risks and benefits program; and/or, the creation of community licence and quota banks.

Recommendation 9

That Fisheries and Oceans Canada create a loan and mentorship program to help independent harvesters enter the industry.

Recommendation 10

That Fisheries and Oceans Canada work with the Government of British Columbia to develop strategies to expand value-added fish processing in British Columbia and the recapture of benefits from processing in adjacent communities.

Recommendation 11

That Fisheries and Oceans Canada, with regard to West Coast commercial fisheries, establish an open public auction process to allow fishers to lease licence and quota.

Recommendation 12

That Fisheries and Oceans Canada, with regard to West Coast commercial fisheries, establish a licence exchange board to allow the trading of licences between owners.

Recommendation 13

That Fisheries and Oceans Canada reconstitute the membership of advisory boards to ensure equitable representation by fishers, processors and quota owners.

Recommendation 14

That Fisheries and Oceans Canada develop a new policy framework through a process of authentic and transparent engagement with all key stakeholders:

- Active fish harvesters (or where they exist, organizations that represent them) in all fisheries and fleets including owner-operators, non-owner operators, and crew;
- First Nations commercial fish harvesters (or where they exist, organizations that represent them);
- Organizations representing licence and quota holders that are not active fish harvesters, including fish processing companies;
- Organizations representing First Nations that hold licences and quotas for commercial fisheries;
- The Minister responsible for fisheries in the British Columbia government;
- Fisheries policy experts from academic institutions nongovernmental organizations; and,
- Representatives of municipal governments and socio-economic development, health and cultural agencies in coastal communities.

Recommendation 15

That, with regard to West Coast commercial fisheries, the Minister of Fisheries and Oceans establish an independent commission to:

- Develop a concept for a 'fair-share' system to equitably allocate the proceeds from the fishery of individual species between the quota/licence holder, the processor and the harvester based on the average wholesale price earned by the processor over a three-month period;
- Work with Fisheries and Oceans Canada to explore the feasibility of set limits on the amount of quota or number of licences for an individual species that can be owned by an individual or entity and ensure that comprehensive consultations are undertaken;
- Devise a policy of current market buy back from fishers looking to exit the industry and to prioritize that quota and licence sale to emerging young or independent fishers through a student/mentorship/apprenticeship program as has been done successfully in other regions for the country and other jurisdictions (Maine, Alaska, Norway) who have testified before this committee; and,
- Prepare a concept through comprehensive consultations that could transition the West Coast fishery to a "made-in-BC" owner-operator model.

Recommendation 16

That the development of Fisheries and Oceans Canada's new policy framework should be undertaken by a working group chaired by a senior National Headquarters official and comprised of appropriate officials from National Headquarters and Pacific Region.

Recommendation 17

That the Minister of Fisheries and Oceans direct the Department to develop an implementation framework for transition with time limits and phased approaches similar to the Policy for Preserving the Independence of the Inshore Fleet in Canada's Atlantic Fisheries (PIIFCAF), but appropriate to particular fleets and/or fisheries.

Recommendation 18

That transition strategies should take account of the recommendations, needs, rights and capacities of First Nations and the framework for reconciliation.

Recommendation 19

That the Minister of Fisheries and Oceans initiate immediate steps to regulate quota licence leasing costs to allow for a fair return for vessel owners and adequate incomes for fish harvesters during the transition to owner-operator. Such measures should continue after transition to guarantee crews fair wages under the new regime.

Recommendation 20

That Fisheries and Oceans Canada develop a plan to achieve its five-objective fisheries management regime, which includes conservation outcomes: compliance with legal obligations; promoting the stability and economic viability of fishing operations; encouraging the equitable distribution of benefits; and facilitating data collection for administration, enforcement and planning purposes.

Appendix 2: Differences between East Coast and West Coast Licence / Quotas Systems

- In Atlantic Canada in 2007, DFO adopted the Policy for Preserving the Independence of the Inshore Fleet in Canada's Atlantic Fisheries (PIIFCAF).
 - PIIFCAF was put in place to ensure that commercial inshore fish harvesters remain independent, and that the benefits of fishing licences flow to the fisher and coastal communities.
- In the Pacific, over several years, DFO introduced measures to manage fish stocks including: a limited entry licensing regime, total allowable catch (TAC) limits and individual transferable quotas (ITQs) for some fisheries.
 - ITQs give their owners exclusive and transferable rights to catch a given portion of the TAC of a given fish stock.
 - ITQs can be owned by individual active and non-active fishers, non-fisher investors, vessels or enterprises, and are transferable through selling, buying and leasing in an open market.
 - Over time, some owners of ITQs found they can make more money leasing out their quotas than fishing it themselves, this process is not monitored.

Appendix 3 WSAC Goal 2 Strategic Recommendations

Goal 2: Protect and Enhance Economic, Social and Cultural Benefits to BC Communities from Wild Salmon and Fisheries

WSAC STRATEGIC RECOMMENDATIONS

2.1 Elevate discussions and decisions about using strategic enhancement opportunities to stabilize the commercial and recreational fishing industries in BC

2.2 Develop and implement a strategic employment plan to include training, mentoring and job creation.

2.3 Enhance local social, cultural and economic benefits from BC fisheries for adjacent communities and their active commercial and recreational fishers, including both tidal and freshwater anglers.

2.4 Encourage economic activity adjacent to fishing grounds to benefit coastal and rural fishing communities, Indigenous peoples, shore workers and ancillary businesses.

2.5 Leverage the weight of existing marketing and branding programs in BC and Canada to raise the value and profile of wild salmon and seafood products from BC

2.6 Support fisheries-related eco-tourism opportunities in BC

BRIEFING NOTE FOR INFORMATION

DATE: July 6, 2022

PREPARED FOR: Honourable Josie Osborne, Minister of Land, Water and Resource Stewardship

ISSUE: Federal Salmon Integrated Fisheries Management Plan Announcement

BACKGROUND:

- It is anticipated that Fisheries and Oceans Canada (DFO) will announce their 2022 North and South Coast Salmon Integrated Fisheries Management Plan (IFMP) for the Pacific Region in the coming days.
- These IFMPs identify the main objectives and requirements for Pacific salmon fisheries (for First Nations, commercial and recreational harvest) and outline the management, rules and information about fish stocks and fisheries. They are updated annually.
- Preliminary documents indicate that part of the updated IFMP is work being conducted within the federal Pacific Salmon Strategy Initiative (PSSI) under their Harvest Transformation pillar which aims to move all harvesting sectors (Indigenous, commercial and recreational) toward greater viability, sustainability and resilience, while being subject to increased conservation.
- The \$647 million (M) PSSI was introduced in 2021, and included significant fisheries closures aimed at protecting salmon stocks of concern. For 2022, conservation measures are expected to increase compared to last year, include the following key elements:

Long term commercial closures (at least 1 salmon generation (4-5 years))

- Nine of the 22 commercial closures in DFO's Pacific region are new to B.C. in 2022, an additional nine were already closed as of 2021, the remaining four are either in Yukon or Transboundary with Alaska.

Mitigation Measures

- DFO has indicated that certain areas will be subject to "mitigation measures" which will look at options to shift to more selective fishing gear or, where available, to other non-salmon species or adjusted opening and closing times that support increased conservation. These measures will impact 22 fisheries in B.C. including Nisga'a Treaty fisheries.

The Pacific Salmon Commercial Licence Retirement Program (LRP) (July 2022 -March 2025)

- DFO has allocated \$93M for the LRP which is intended to provide commercial salmon licence holders the opportunity to retire their licences on a voluntary basis. An additional \$8.36M will be available from Pacific Salmon Treaty (PST) Mitigation Program funding for troll licence retirement.

Pacific Salmon Indigenous Communal Commercial Licence Alternation Program (July 2022 - rollout summer / fall 2022)

- The program will provide an opportunity for First Nations and Indigenous groups to voluntarily exchange communal commercial salmon licenses for funding (based on market value and other considerations), which can then be used to acquire alternative (non-salmon) commercial fisheries access. Licenses acquired by DFO will be retired.

DISCUSSION:

Earlier this year the Province (ADM James Mack) sent DFO (Salmon Management Team) a letter indicating priorities for the Province for the IFMP (Appendix 2).^{s.16}

s.16

In recreational fishing, there are limited changes compared to last year. Southern Resident Killer Whale closures and chinook restrictions continue to be the main drivers for recreational closures. The Province and recreational sector have advocated in support of DFO moving towards mark-selective fishing (MSF) opportunities,^{s.16}

s.16

s.16

Many of the new IFMP measures will support and enhance provincial work on wild Pacific salmon^{s.13}
s.13; s.16

INDIGENOUS PEOPLES:

Indigenous peoples make up a significant proportion of commercial fishers in the Province, as well as having economic interests in tidal sportfishing and aquaculture. Additionally, Indigenous peoples have strong cultural and social ties to salmon and the marine environment consecrated in a Constitutional right to harvest fish. About 31 percent of all commercial fishing jobs (including processing) are held by B.C.'s Indigenous people. First Nations communities provide approximately 20 percent of the workforce in the aquaculture and fishing sector, substantially higher than the provincial average of five percent.

CONCLUSION:

The federal government's 2022 IFMP largely responds to provincial request and will positively contribute/enhance B.C.'s wild pacific salmon work^{s.16}

s.16

s.16

Attachments:

Appendix 1: s.16

Appendix 2: B.C. letter to DFO on 2022 IFMP

PREPARED BY:

Rebecca Wardle
Policy Analyst
Fisheries, Aquaculture and Wild Salmon
778 698-3129

REVIEWED BY:

	Initials	Date
DM	DM	June 6, 2022
ADM	JM	June 6, 2022
Program Dir/Mgr.	DT	July 5, 2022



s.16



s.16

Appendix 2: B.C. letter to DFO on 2022 IFMP

File: 0280-30

Reference: 27223

April 27, 2022

VIA EMAIL: DFO.PacificSalmonRMT-EGRSaumonduDpacifique.MPO@dfompo.gc.ca

Pacific Salmon Management Team
Fisheries Management
Fisheries & Oceans Canada
#200 - 401 Burrard St
Vancouver, BC. V6C 3S4

To DFO's Salmon Management Team:

Re: the 2022-23 draft Northern and Southern BC Salmon Integrated Fishery Management Plans

The Ministry of Land, Water and Resource Stewardship on behalf of the Province of British Columbia appreciates the opportunity to provide comments on Fisheries and Oceans Canada's (DFO) proposed 2022-23 draft Northern and Southern BC Salmon Integrated Fishery Management Plans.

The Province sees our relationship with DFO as key to ensuring B.C. has healthy wild Pacific salmon and a robust fisheries and aquaculture sector. A fundamental part of the Minister of Land, Water and Resource Stewardship's new mandate is to be the clear provincial lead for our work with DFO. The role that DFO plays is critical, and we're pleased to convey our best advice for how to improve the IFMP in the interests of fisheries and British Columbians. Please consider this letter as a start to us working together through the development of the IFMP.

Wild Pacific salmon are of great social, environmental, historical, and economic importance to British Columbians. They sustain communities coast-wide and generate significant value and employment. Many of these stocks have suffered disastrous declines leading to equivalent declines in the ecosystems and economies that rely on them. With 44 out of 59 Pacific salmon stocks assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) at varying degrees of risk, it is more important than ever to adjust management approaches to ensure extirpation does not occur.

The B.C. Minister of Land, Water and Resource Stewardship, and the Parliamentary Secretary for Fisheries and Aquaculture, have mandate commitments to work with the federal government to develop new strategies to protect and revitalize B.C.'s wild salmon populations building on past successes such as protection of fish habitat and innovation in fish hatcheries.

The Minister's mandate also includes working to double the B.C. Salmon Restoration and Innovation Fund (BCSRIF). We are actively working towards new initiatives to assist salmon recovery, specifically through the development of a made-in-B.C. Wild Salmon Strategy. We see significant opportunities for alignment between our B.C. wild salmon recovery strategies with DFO's new Pacific Salmon Strategy Initiative (PSSI) and are eager to continue to collaborate on these initiatives. As a part of this transformational process, it is important to consider how DFO could manage salmon using a multi-year approach. We note that the IFMP's have been developed annually, and a process that reflects the conservation objectives across generational cycles of all species, fished both directly and bycaught, would benefit overall sustainability objectives.

2022

Plans

As we have heard through recent briefings, the overall 2021 salmon returns continued to be low with some exceptions. Looking ahead to 2022, returns are forecast to again be low, although it will be a dominant Adams River sockeye year that could bring some abundance and potential for harvest. For B.C., concerns remain for Interior Fraser River (IFR) steelhead that are at extremely low abundance levels and are now undergoing a full reassessment through COSEWIC. Overarching planning must account for poor survival, low productivity, and the negative impacts of the Big Bar rockslide on Fraser River stocks of concern, as well as impacts resulting from the November 2021 flooding event. B.C. encourages DFO's ongoing precautionary fishery management actions to support conservation and promote rebuilding of these stocks. B.C. requests that DFO identify and communicate all the planned conservation measures as early in 2022 as possible, given their importance to B.C.'s communities, industry and to salmon populations. B.C. heard from industry that the late notice on the "PSSI closures" in 2021 had a significant fiscal impact on fishers and supporting businesses, so the additional time for businesses to plan and make decisions in response to the 2022 conservation measures is critical. We recognize that there will likely be very limited salmon fisheries opportunities coastwide for 2022. The poor environmental conditions persist, and as we have seen there are many stocks designated as "at risk" that require protection. We all remain deeply concerned regarding the low status of the iconic Early Stuart sockeye, and several southern chinook stocks as well as steelhead. However, ensuring that harvest opportunities are available for those stocks that are stable is important to ensure Indigenous and coastal communities can take advantage of the socioeconomic and food security benefits these stocks offer.

Licence Retirement

The latest information available regarding the Pacific Salmon Commercial Licence Retirement Program, a major Pillar of the PSSI, indicates that DFO has received some input from stakeholders, and that formal consultations were held from January to February 2022. B.C. requests that this process be transparent and open to ensure that all parties can understand the options available to them, and to ensure that their perspective is heard in the design. We also request that B.C. be invited to participate in that process, given the significant economic impact to coastal communities. It is unclear whether the previously established Commercial Fishing Small Working Group, which the Province participated in with the understanding it was the main forum for

designing licence retirement options, is still active with any purpose. To this point, B.C. has not been formally consulted on the License Retirement Program, despite significant provincial interests and jurisdiction in the fishery itself and the commerce of fisheries in B.C. Establishing a fair process is of utmost importance to B.C. communities that have long relied on salmon fishing as an important source of income, and critical to the Province's jurisdiction over the commerce of fisheries.

Steelhead

B.C. remains very concerned about the impact of bycatch on Interior Fraser River steelhead (IFS) populations which are of Extreme Conservation Concern. The spawning populations of Thompson and Chilcotin steelhead in 2021 were estimated to be 203 and 19, respectively. This is well into the 'Extreme Conservation Concern Zone'. Based on Albion test fishing, the forecast return of Thompson and Chilcotin in 2022 is expected to be 68 and 32, respectively. More needs to be done to protect Interior Fraser steelhead. At the current abundance, every fish counts. We urge DFO to enact longer closure windows during times when the data indicate presence of steelhead. We also recommend DFO continue to consider other forms of selective fishing that avoid steelhead mortality through timing, gear type and location changes to fishing opportunities. We note that steelhead catch has continued to occur, despite the initial measures put in place in 2019.

Based on the expected Fraser sockeye fisheries and the significant overlap in timing between Fraser sockeye and IFS, B.C. is very concerned that IFS will be caught in sockeye directed fisheries. B.C. again urges DFO to consider further changes to fisheries management. Based on an 84-day rolling window for migration, we believe a closure window that protects over 90% of the run is necessary at this time, along with other protective actions for the full duration. The currently proposed closure windows expose IFS to significant risk. Where this cannot be achieved, we recommend that non-selective fisheries (commercial and Indigenous) be replaced with highly selective fisheries or moved to more terminal areas and catch monitoring is strengthened, not only to ensure the protection measures are implemented, but to provide added data to support future fisheries decisions. As noted earlier, moving to a multi-year fisheries plan would support the planning and action required to make these important shifts to result in more sustainable fisheries. We do not support adding additional selective fisheries without also reducing non-selective fisheries, as this would increase the risk to IFS.

To be clear, we expect the current protection measures to continue at a minimum, and given continued declines, expect that further protections are added. We also welcome an opportunity to work with Federal and Indigenous partners to develop a longer-term fisheries plan that enables recovery of IFS and Indigenous access, while supporting the range of fisheries interests. In addition to IFS, Skeena steelhead numbers have also now declined well into the 'Extreme Conservation Concern Zone,' with the return in 2021 estimated to be approximately 5000 steelhead, 23% of the historical average. Skeena steelhead are at risk of being caught in both U.S. and Canadian marine fisheries and are also vulnerable to being caught in gillnet fisheries in the Skeena. It is critical that the declining abundance of northern steelhead is addressed immediately and by all management agencies to avoid a similarly disastrous scenario for Skeena steelhead as is now occurring for IFS. Given the risk level to Skeena steelhead, and in accordance with the need for increasingly precautionary management as risk increases, we expect to see additional protection measures put in place for the 2022 season. We understand there is currently no, or limited, plans for catch monitoring and with these declines we believe monitoring requirements and actions are

required for Skeena steelhead. These measures are essential to both ensuring any steelhead bycatch is given the highest chance of survival and the data gained on bycatch would inform future discussions on mixed stock fisheries with BC. Again, we welcome further discussions of how increasingly selective methods might enable an even stronger fishery for salmonid stocks in abundance.

Lastly, beyond the Skeena River stocks, we understand that Nass, Stikine, and Taku River summer steelhead are all at risk of being caught in marine fisheries and are also vulnerable to being caught in terminal gillnet fisheries.

Enhancement

We look forward to further discussion on salmon enhancement and DFO's new direction for the Salmonid Enhancement Program (SEP) under the PSSI. B.C. understands that SEP will be transitioning to a model that supports conservation and mass marking, and that this process will take some time to complete. We understand that changes may also be made to the program to support more mark-selective fishing opportunities, and we support the work to evaluate and implement these options as soon as possible so that conservation and fisheries certainty benefits can be realized.

Enforcement, outreach, and education

For 2022, it will again be important to have a strong federal presence on the water to help ensure compliance and understanding of all fisheries conservation and management measures. We are supportive of your broad plans and wish to emphasize that DFO's approach should include increased enforcement on the water, on the ground and in the air. Specifically, we are requesting that DFO expand the monitoring of stocks that have an elevated risk of steelhead bycatch to better inform decision making; that all fisheries are carefully monitored by skilled observers; and that the data collected regarding catch, effort, and bycatch are made available to all interested parties. B.C. supports DFO's deterrence of illegal fishing and assurance that conditions of licence are met through a graduated enforcement approach. The Province is very supportive of working with First Nations and Indigenous groups on monitoring, education, and guardian-like initiatives to enable more informed fisheries management and encourages DFO to expand its efforts in this area.

We look forward to continuing to work with DFO and through the Pacific Salmon Commission process to enhance data sharing among agencies and between Canada and the U.S.A.

Thank you again for the opportunity to provide comments on behalf of B.C. We look forward to continuing to work collaboratively with you under the mandate of the new Ministry of Land, Water and Resource Stewardship, through the development and implementation of the IFMPs. We also look forward to meeting with you soon, as we all seek rebuild and to halt the decline of these iconic Pacific salmon stocks.

Sincerely,



James Mack
Assistant Deputy Minister
Water, Fisheries and Coastal Policy & Planning

BRIEFING NOTE FOR INFORMATION

DATE: July 25, 2022

PREPARED FOR: Honourable Josie Osborne, Minister of Lands, Water and Resource Stewardship

ISSUE: Meeting with Wild Salmon Forever to discuss issues impacting Pacific wild salmon including aquaculture.

BACKGROUND:

- Tony Allard in his role as founder and Chair of Wild Salmon Forever (WSF) wrote to Minister Osborne in March 2022 to congratulate her on her appointment and to request a meeting to discuss shared interests regarding wild pacific salmon.
- Interviews with Mr. Allard quote him describing WSF as “a group of influential business-types who’ve taken a particular interest in the future of salmon farming”. Mr. Allard is also the Chair of the Wild First campaign which aims to support governments, communities and individuals working together to transition away from open net pen fish farms in the coastal waters of B.C.
- In addition to involvement in the WSF and the Wild First campaign, Mr. Allard is also the owner and proprietor of Good Hope Cannery lodge, a private sport-fishing lodge in Rivers Inlet. Mr. Allard also supports the Pacific Salmon Foundation (PSF) and the Salish Sea Marine Survival Project (SSMSP).
- He has made multiple large donations to fund initiatives and research into declining wild salmon populations. He is also President of Hearthstone Investments, which has holdings primarily in commercial real estate and public equities and PharmaJet, a vaccine delivery company based in Golden, Colorado.

DISCUSSION:

Mr. Allard has been an outspoken critic of salmon aquaculture in B.C. and brought that position to his appointment as a member of the Minister of Agriculture’s Advisory Council on Finfish Aquaculture (MAACFA) through 2017-2018. Mr. Allard has been vocal in support of the Broughton Implementation Plan, as well as a desire to have salmon farms removed from the Discovery Islands citing risk to migrating juvenile salmon.

The federal Liberal Platform committed in 2019 to “...develop a responsible plan to transition from open-net pen salmon farming by 2025” in B.C. In June 2022 Minister Murray made an announcement regarding federal aquaculture licence renewals, and sector transition and will be holding consultations with the Province, Indigenous organizations and stakeholders over the coming months. LWRS staff are engaged in the federal Strategic Oversight Committee that supports the overall 2025 Transition and B.C. has implemented its Salmon Aquaculture Policy whereby “Effective June 2022, the Province will grant *Land Act* tenures only to fish farm operators who have satisfied DFO that their operations will not adversely impact wild salmon stocks (i.e., hold a valid DFO license), and who have negotiated agreements with the First Nation(s) in whose territory they propose to operate”.

B.C. is active on files related to wild salmon including establishing a “home for salmon” within the new Ministry of Land Water and Resource Stewardship (LWRS). The Province has also partnered with the First Nations Fisheries Council to support work on salmon and is working with the federal government to ensure provincial interest are reflected in both their Pacific Salmon Strategy Initiative and the Pacific Salmon Treaty. Significantly, B.C. will also be doubling its contribution to the British Columbia Salmon Restoration and Innovation Fund (BCSRIF) which is a federal provincial joint program (anticipated next intake fall 2022). The enormity and complexity of the threats to wild salmon cannot be addressed by a single entity and LWRS will be looking at ways to incorporate wild salmon in both the Coastal Marine and the Watershed Security Strategy and will also look at how B.C. can formalize

working with both Indigenous organizations and the federal government^{s.16}
s.16

INDIGENOUS PEOPLES:

Many First Nations oppose the presence of salmon aquaculture within their traditional territories due to concerns about the impacts on wild Pacific salmon. Pacific salmon are of critical cultural, social, and economic importance for coastal and interior First Nations. One-third of fish harvesting jobs are in First Nation communities. In B.C.'s four largest salmon farming companies, 240 employees or 30 percent of the total direct jobs are staffed by First Nations employees. Some First Nations support open-net pen salmon aquaculture and have agreements in place with companies operating in their traditional territories.

MINISTRY RESPONSE:

- Wild salmon are critically important in B.C., and we are working on our Wild Salmon Strategy to ensure that the Province is leading the way in recovery.
- We look forward to working with you and others to help Pacific wild salmon through avenues such as BCSRIF and the further development of our Coastal Marine and Watershed Security Strategies.
- We are also actively engaged with our federal and First Nation partners on the Transition Plan development and are now participating as a member of a joint committee to help oversee this work. In this role, we will continue to advocate for a plan that respects the environment and First Nations decision making while protecting the livelihoods of Indigenous and coastal communities that rely on the sector.
- We are committed to ensuring an orderly implementation of the provincial Salmon Aquaculture Policy that guides B.C.'s decision making on the issuance, renewal, and amendment of salmon farm tenures.

PREPARED BY:

Rebecca Wardle
Senior Policy Advisory
FAWSB
236 478-2417

REVIEWED BY:

	Initials	Date
DM	LH	July 25, 2022
ADM	JM	July 25, 2022
Program Dir/Mgr.	DT	July 25, 2022