



Fisheries and Oceans Canada Discussion Paper:

**Perspectives and Recommendations from the
Review of the 1999 Allocation Policy for Pacific
Salmon in British Columbia**



Executive Summary

Since 2023, Fisheries and Oceans Canada (DFO) has been working with First Nation representatives, as well as representatives from the Commercial Salmon Allocation Board (CSAB) and the Sport Fishing Advisory Board (SFAB), to review the 1999 *An Allocation Policy for Pacific Salmon* (“Salmon Allocation Policy” or “SAP”) and develop recommendations for a renewed policy that would apply to British Columbia (BC).

This document outlines proposed recommendations currently under consideration and seeks your feedback to help shape the future direction of the SAP. We invite you to share your input by **January 9, 2026**.

Released in 1999, the SAP outlines a series of principles to guide the allocation of allowable Pacific salmon catch among First Nations as well as commercial and recreational fisheries. The policy does not prescribe specific allocations for individual fisheries.

The SAP review was initiated by the former Minister of DFO, Dominic LeBlanc, following the 2018 British Columbia Supreme Court’s ruling in *Ahousaht*. The Court found that DFO’s application of the policy unjustifiably infringed on five Nuu-chah-nuth Nations’ (Ahousaht, Ehattesaht/Chinekint, Hesquiaht, Mowachaht/Muchalaht and Tla-o-qui-aht) Aboriginal rights to fish and sell fish insofar as the SAP accorded priority in allocation to the recreational fishery over the Five Nations’ right-based sale fishery for Chinook and Coho salmon. DFO responded to the court decision through the development of a Fisheries Management Plan for the Five Nations. However, the Five Nations disagree that this Fisheries Management Plan fully accommodates their Aboriginal right or complies with the judgments of the BC courts.

The review process is guided by a [Terms of Reference](#). Since June 2023, meetings have been held with a First Nation-DFO Committee (FN-DFO Committee) and a separate Multi-Party Working Group (MPWG) that includes representatives from First Nations and First Nation organizations, recreational fishery interests (via the Sport Fishing Advisory Board), and commercial fishery interests (via the Commercial Salmon Advisory Board). As per the Terms of Reference, DFO is now conducting broader consultations on the recommended changes to the policy that have been brought forward in discussions with these groups. Consultations with First Nations will be conducted by DFO in accordance with the Crown Duty to Consult.

Following this consultation period, the First Nations-DFO Committee and MPWG will meet in early 2026 to review the feedback and finalize recommendations for submission to the Minister. For issues where agreement has not been reached, DFO will provide the Minister with the recommendations accompanied by information that reflects the perspectives of the participants. As per the Terms of Reference, the FN-DFO Committee may also submit a supplementary report on the proposed options to accompany the recommendations package. Issues raised during the review process that relate to salmon allocation, but that DFO has deemed out-of-scope will also be summarized for the Minister.

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Purpose

The purpose of this discussion document is to seek feedback and views from First Nations and the recreational and commercial harvest sectors in British Columbia on recommended changes to the 1999 Salmon Allocation Policy.

Background

What is the Salmon Allocation Policy (SAP)?

In 1999, Fisheries and Oceans Canada (DFO) released [*An Allocation Policy for Pacific Salmon*](#) (“Salmon Allocation Policy” or “SAP”), which outlines a series of principles for sharing allowable catch of Pacific salmon between First Nations, the recreational sector, and the commercial sector, as well as within the commercial fishery among gear types (gillnet, seine and troll). The SAP is intended to support fisheries managers in ensuring that allocations follow the order of priority laid out in the policy, uphold Aboriginal and treaty rights as recognized and affirmed in the *Constitution Act, 1982* and align with international obligations including the Pacific Salmon Treaty.

The current Salmon Allocation Policy has seven allocation principles: three overarching principles related to conservation, First Nations, and common property; two principles on allocation between the recreational and commercial sectors; and, two principles on allocation within the commercial sector on selective fishing and gear allocations.

The SAP prioritizes conservation first, followed by First Nations’ food, social, and ceremonial (FSC) requirements and Treaty obligations. It then provides the recreational sector with priority over the commercial sector for Chinook and Coho. For Sockeye, Pink, and Chum, the commercial sector is allocated 95% of the combined commercial and recreational harvest on a coast-wide basis, with the remaining 5% going to the recreational sector.

Why is the SAP being updated?

The SAP review was initiated by the former Minister of DFO, Dominic LeBlanc, in response to the 2018 BC Supreme Court’s ruling in the *Ahousaht* case. Following the ruling, Minister LeBlanc released a statement which contained the following commitment: “As an immediate step, I have directed Fisheries and Oceans Canada to review the *Pacific Salmon Allocation Policy*. We will work in collaboration with Indigenous groups and all stakeholders to renew and co-develop this policy.”

Since the SAP was first adopted, there have been substantial changes in terms of fisheries management, fisheries policy, Aboriginal rights, treaties, and reconciliation. These changes include modern treaties signed with First Nations in British Columbia, which confer constitutionally-protected fishing rights, as well as the release of the Truth and Reconciliation Committee’s Calls to Action, the *Principles Respecting the Government of Canada’s Relationship with Indigenous Peoples*, and the enactment of the *United Nations Declaration on the Rights of Indigenous Peoples Act*. Since the 1999 policy was released, DFO has also introduced *Canada’s Policy for Conservation of Wild Salmon* and the Sustainable Fisheries Framework, as well as other policies related to sustainable fisheries management. Additionally, there have been increased

conservation requirements for a number of stocks of concern, with Pacific salmon returns becoming more uncertain and variable from year to year.

What is the process and scope for the BC SAP review?

PROCESS

Following the 2018 *Ahousaht* decision, DFO worked with representatives from BC First Nations and the commercial and recreational harvest sectors to create a comprehensive Terms of Reference for the review process, which received Ministerial approval in 2022. In 2023, DFO convened the First Nations-DFO Committee and a separate Multi-Party Working Group (MPWG), and has been working with both groups since then to review the 1999 SAP and develop recommendations for its renewal (see Appendix A for group membership). The review process is intended to provide First Nations, and the recreational and commercial sectors with an opportunity to work together to develop shared recommendations.

This discussion document summarizes the key themes and perspectives raised through written proposals and perspectives shared to date through the First Nation-DFO Committee and the MPWG by First Nations, the commercial sector, and the recreational sector. Within this document:

- **Areas of Agreement** refer to recommendations that received general support from First Nations, and from the commercial and recreational sectors, as represented by delegates on both the First Nations-DFO Committee and MPWG.
- **Areas of Disagreement** reflect recommendations that did not receive general support from all three represented groups. In some cases, though, there was agreement among two groups, and this has been noted.

In some instances, the groups provided **Additional Considerations** for updating the policy. These recommendations highlight important context, perspectives and guidance that the groups recommend be included in the final policy. Additional considerations may include clarifications to policy language, suggestions for future processes, or factors to support effective implementation.

Further Recommendations are specific recommendations proposed by the represented groups that go beyond the core allocation principles and focus on areas such as implementation, monitoring, evaluation or governance.

SCOPE

This review focuses on developing a renewed policy to guide the allocation of allowable harvest of Pacific salmon in BC between First Nations right-based fisheries (i.e., including Aboriginal and treaty rights such as food, social and ceremonial, treaty domestic and right-based commercial fisheries), the commercial fishery, and the recreational fishery.

As per the Terms of Reference, the SAP review will not:

- a) Consider new fisheries access or allocations within sectors (e.g., it will not define allocation amounts for First Nation food, social and ceremonial requirements, or gear types within the commercial sector):
 - 1999 SAP Section 4.3 “Allocations Within the Commercial Sector” is not included in the review as allocations within the commercial sector are set out in the Commercial Salmon Allocation Framework which was approved in 2015.

- b) Develop operational guidance or implementation plans. For example, the review will not create detailed operational instructions or management plans for salmon fisheries in BC. This is the purview of the Integrated Fisheries Management Plan (IFMP) development process, which considers a number of factors (including the SAP) in the development of area and species-specific fishing plans. However, the policy may provide guidance and factors that should be considered in decision-making. Further, the review should take into account practical realities – such as feasibility and costs so that recommendations are implementable.

The renewed SAP will be consistent with the *Constitution Act, 1982*, existing policies and case law, while also providing flexibility to incorporate future changes (e.g., First Nations' rights that may be recognized in the future). In addition, the SAP review will be without prejudice to the positions of Canada, and First Nations with respect to reconciliation processes and Aboriginal or treaty rights or title. It will also not limit or define any Aboriginal or treaty rights or title (or set out specific allocations for First Nations groups).

The Terms of Reference acknowledge that issues and interests may be raised that are related to the SAP but not within the direct scope of this review such as other fisheries policies, regulations, issues and processes. These issues, which DFO has deemed to be “related,” are included in this document and will be presented to the Minister for further consideration in addition to the proposed recommendations.

DFO has attempted to capture a range of perspectives to encourage broader discussion, but this document may not reflect every viewpoint or nuance. We invite feedback and additional insights to inform the review. Any errors or omissions remain the responsibility of DFO.

Further information on both the process and scope is available in the [Terms of Reference for the Pacific Salmon Allocation Policy review in BC | Pacific Region | Fisheries and Oceans Canada](#)

Proposals for Consultation

Allocation Principle 1 – Conservation

CURRENT PRINCIPLE

Conservation of Pacific salmon is the primary objective and will take precedence in managing the resource.

PROPOSED CHANGE

Refocus the principle so that the policy recognizes the importance of healthy and diverse Pacific salmon populations.

SCOPE OF POTENTIAL CHANGES

- A renewed SAP will not compromise the conservation of Pacific salmon.
- The SAP is not intended to set out specific conservation requirements or define total allowable harvests. Conservation requirements and guidelines for setting total allowable catches are set out in Integrated Fisheries Management Plans (IFMP) and are informed by other policies such as *Canada's Policy for Conservation of Wild Pacific Salmon*, the Sustainable Fisheries Framework, science and other processes.

AREAS OF AGREEMENT

- Conservation of Pacific salmon to remain the first priority and principle.
- The principle should be updated to include reference to *Canada's Policy for Conservation of Wild Pacific Salmon* ("Wild Salmon Policy") and other relevant policies/legislation.

ADDITIONAL CONSIDERATIONS

- First Nation representatives raised concerns about vague policy language with respect to conservation; and recommended changes to ensure that the policy supports ecosystem resilience, considers salmon diversity and abundance, and aligns with rebuilding plans. These changes include re-focusing the principles on "Healthy and Diverse Salmon Populations".
- SFAB representatives recommended keeping "conservation" as the title of the principle, but suggested clarifying its meaning by linking it to the goal of maintaining healthy and diverse salmon populations within this principle.

Seeking Your Views

? Question 1:

Do you agree/support the recommendations on Areas of Agreement? If not, why?

? Question 2:

Where there are Areas of Disagreement or Additional Considerations identified, do you prefer/support any of the proposed approaches? Please specify and provide reasons why.

? Question 3:

Do you have suggestions on alternative approaches or any other suggestions?

Allocation Principle 2 – First Nations

CURRENT PRINCIPLE

After conservation needs are met, First Nations' food, social and ceremonial requirements and treaty obligations to First Nations have first priority in salmon allocation.

PROPOSED CHANGES

Include provisions for recognized right-based commercial fisheries in addition to food, social and ceremonial requirements and treaty rights to fish.

SCOPE OF POTENTIAL CHANGES

- The updated policy to reflect and be consistent with the *Constitution Act, 1982*, the *Ahousaht* decisions and other relevant case law.
- The policy will not limit or define any Aboriginal or treaty rights or title.

AREAS OF AGREEMENT

- Participants recognized the higher priority of right-based fisheries including food, social and ceremonial fisheries, fisheries implementing historic and treaty rights, as well as right-based commercial fisheries.
- The updated policy should reflect the modern treaty context and acknowledge historic treaties in British Columbia.
- An updated policy should include a definition of 'priority' and provide guidance on how priority should be interpreted and applied in the context of salmon allocation. First Nation and CSAB representatives further recommended that the definition of priority should include factors that fishery managers should consider when making allocation decisions and affording priority.

ADDITIONAL CONSIDERATIONS

- First Nations representatives raised concerns about access to right-based fisheries (e.g., timing, area, gear) suggesting that in many instances First Nation fishing rights have not been upheld. They indicated that the policy should provide guidance to fishery managers on how to uphold First Nations right-based fisheries in order to uphold First Nations rights as protected by the *Constitution Act, 1982*.

Seeking Your Views

? Question 1:

Do you agree/support the recommendations on Areas of Agreement? If not, why?

? Question 2:

Where there are Areas of Disagreement or Additional Considerations identified, do you prefer/support any of the proposed approaches? Please specify and provide reasons why.

? Question 3:

Do you have suggestions on alternative approaches or any other suggestions?

Allocation Principle 3 – Common Property Resource

CURRENT PRINCIPLE

Salmon is a common property resource that is managed by the federal government on behalf of all Canadians, both present and future.

PROPOSED CHANGES

Some agreement to remove common property as a stand-alone principle.

Disagreement on removal of all references to common property in the policy.

SCOPE OF POTENTIAL CHANGES

- The policy will be consistent with case law, constitutional requirements and federal responsibilities.

AREAS OF AGREEMENT

- All groups agree that the allocation policy should acknowledge the Minister of Fisheries' authority to regulate fisheries as per the *Fisheries Act*; and that access to salmon harvest opportunities does not imply ownership.
- All groups agree that salmon must not be privatized.

AREAS OF DISAGREEMENT

- Similar to concerns raised during the development of the 1999 policy, First Nation representatives recommend that all references to “common property” and/or “common property resource” be removed, noting concerns that it is a colonial concept which has been harmful to First Nations, salmon, and ocean ecosystems. First Nation representatives have also indicated that DFO’s management of fisheries (e.g. licensing of harvesters and fisheries opening/closures) has largely replaced the “common property resource” and that what is described in the 1999 policy is no longer relevant, nor serves a useful purpose.
- The SFAB representatives recommend that common property be included in an updated policy either as a stand-alone principle or in the context section, and noted that salmon’s status as a common property resource remains an overarching principle informing allocation. Further, they indicate that the public right to fish continues to hold legal significance as a right of all Canadians.

Seeking Your Views

❓ Question 1:

Do you agree/support the recommendations on Areas of Agreement? If not, why?

❓ Question 2:

Where there are Areas of Disagreement or Additional Considerations identified, do you prefer/support any of the proposed approaches? Please specify and provide reasons why.

❓ Question 3:

Do you have suggestions on alternative approaches or any other suggestions?

Allocation Principles 4 and 5 – Recreational Allocation and Commercial Allocation

CURRENT PRINCIPLES

Recreational Allocation: *"After conservation needs are met, and priority access for First Nations is addressed, recreational anglers will be provided priority to directed fisheries on chinook and coho salmon, and predictable and stable fishing opportunities for sockeye, pink and chum salmon."*

Commercial Allocation: *"After conservation needs are met, and priority access for First Nations is addressed, the commercial sector will be allocated at least 95 per cent of combined commercial and recreational harvest of sockeye, pink and chum salmon, and the commercial harvest of chinook and coho will occur when abundance permits."*

PROPOSED CHANGES

No consensus agreement on proposed changes.

First Nations and CSAB propose defined allocations for recreational and commercial sectors across all five species.

SFAB propose maintaining the recreational sector's priority for Chinook and Coho and seek to clarify access for Sockeye, Pink and Chum.

SCOPE OF POTENTIAL CHANGES

- The policy will continue to focus on principles used to define relative allocation priority among harvest groups; but it will not consider new fisheries access or allocations within sectors (e.g., between commercial fleets, or within the recreational fishery).
- Note: Separate from recognized Aboriginal and treaty commercial fishing rights, First Nations may also have communal access to salmon as part of the general commercial fishery. DFO's general approach is that these harvest opportunities are managed using the same priority and similar rules as the general commercial fishery.

AREAS OF AGREEMENT

- Though the groups did not reach consensus on recommended changes to the existing commercial and recreational allocation principles, all groups did express a desire for greater certainty in both allocation and opportunity.

Seeking Your Views

? Question 1:

Do you agree/support the recommendations on Areas of Agreement? If not, why?

? Question 2:

Where there are Areas of Disagreement or Additional Considerations identified, do you prefer/support any of the proposed approaches? Please specify and provide reasons why.

? Question 3:

Do you have suggestions on alternative approaches or any other suggestions?

AREAS OF DISAGREEMENT

First Nation and CSAB representatives jointly recommend the following:

- The priority for the recreational sector over the commercial sector be removed for Chinook and Coho salmon, as in their view it infringes on First Nations right-based fisheries, given how allocations and the management of the right-based commercial fishery are linked to the general commercial fishery.
- The recreational sector be managed and regulated to a set allocation (e.g. a percentage catch limit/cap) in order to improve the management of salmon fisheries, and support greater clarity and transparency in the allocation and accounting of all fishery-related mortality. Further, CSAB representatives note that providing fixed or abundance-based shares across all salmon species will prevent the erosion of commercial access and viability.
- Allocation decisions between the commercial and recreational sectors be guided by a principle of First Nations' and Canada's urgent need for food security. A fixed recreational cap or percentage allocation would provide stable and assured access for food production. In addition, if First Nation harvesters are forced to relinquish their vessels due to limited commercial fishing opportunities in the general commercial fishery, their ability to access traditional foods will be significantly reduced.

First Nation representatives also communicated the following:

- Recommend the commercial sector be provided with priority for all five salmon species given the ties between many First Nations and commercial fisheries, and the shared infrastructure necessary to support viable and sustainable fisheries.
- Expressed significant concerns (e.g., non-starter) for changes in allocation priority that will enable recreational harvesters to increase impacts on Sockeye, Pink and Chum, given the conservation concerns of many salmon populations and unmet FSC needs (e.g. Fraser sockeye rebuilding efforts).
- Raised concerns about the 1999 SAP's use of socio-economic data, suggesting that it was both overused and misused. This, combined with the lack of understanding of First Nations' socio-cultural values, impacts its level of influence on decisions.

SFAB representatives recommend the following:

- Maintain the recreational sector's current priority for Chinook and Coho (after First Nations right-based and treaty fisheries but before the commercial sector).
- Maintain the current priority for Sockeye, Pink and Chum however the SFAB will seek to advance interests around timing and other implementation issues within the IFMP process.
- Allocation decisions between the commercial and recreational sector must be guided by a principle of optimizing the social and economic benefits resulting from Canada's salmon fishery resource and that DFO-developed data be included in the policy language, or in the package that will be provided to the Minister to illustrate this.
- In addition, SFAB representatives raised concerns about a recreational "cap" as this could constitute a specific allocation amount, which is considered outside the scope of the review.
- SFAB representatives also maintain that the general commercial fishery should not have the same priority as First Nation right-based fisheries.

ADDITIONAL CONSIDERATIONS

- First Nations and CSAB representatives recommend that any negotiations for defining shares (e.g. percentages and/or fixed amounts) be developed, where possible, at more local sub-regional scales as opposed to a coastwide basis.
- CSAB representatives recommend that a further time-limited (e.g., six months) process be set up to define recreational and commercial fixed sharing arrangements and to determine whether these should be coast-wide, area or fishery based.

Proposed Allocation Principle – Bycatch and Incidental Mortality (IM)

CURRENT PRINCIPLE	PROPOSED CHANGES
<p>No current principle on bycatch and incidental mortality.</p> <p>Focus of 1999 SAP was on directed fisheries for target stocks and providing allocation guidance for these fisheries.</p>	<p>Where bycatch and incidental mortality limits constrain access to target stocks, the amount of bycatch and incidental mortality allowed will be based on conservation limits. The sharing of that bycatch and incidental mortality will respect the priority of First Nation right-based fisheries.</p>

SCOPE OF POTENTIAL CHANGES

- The impacts of bycatch or incidental harvest has become a major factor affecting the ability of salmon harvesters to pursue directed fisheries for target species. For example, in mixed stock fisheries, though harvesters may be targeting a healthy stock, there could be a risk that they will intercept a stock of conservation concern. The amount of bycatch and incidental mortality allowed (if any) is based on conservation requirements.

AREAS OF AGREEMENT

- The updated SAP should include guidance to inform annual decision-making on the sharing of allowable bycatch and incidental mortality impacts among First Nation right-based fisheries, the commercial and recreational sectors.
- Decisions will respect the allocation priority of First Nations right-based fisheries.

ADDITIONAL CONSIDERATIONS

- Total mortality (e.g., inclusive of bycatch and incidental mortality) should be considered in all allocation decisions.
- First Nations representatives expressed concern that bycatch sharing could potentially infringe on First Nation right-based fisheries, particularly in times of low abundance. They also recommend framing the discussion around limits (e.g., maximum exploitation rate), rather than allowable impacts/sharing, and utilizing language consistent with DFO's Policy on Managing Bycatch.
- Furthermore, First Nation representatives were adamant that allocations be equal to total mortality (e.g. inclusive of incidental mortality and bycatch).
- First Nation representatives also noted that First Nations would like to see an end to the practice of catch-and-release fishing.
- The Five Nations disagree with DFO's approach to bycatch. In the context of their right-based multi-species fishery, there is no "bycatch" as they retain all species they catch. First Nation representatives are opposed to discarding dead fish, stating it is against cultural practices of many First Nations in BC.
- SFAB representatives caution against providing a fixed mechanism or metric for sharing of bycatch or incidental mortality given the complex factors impacting bycatch and incidental mortality. Instead, they recommend focusing on monitoring, data collection and information sharing. Decisions will respect the priority of First Nations' right-based fisheries, and if possible, attempt to avoid broad commercial and recreational fishery closures where the potential impacts on stocks of concern are deemed to be low.
- In addition, SFAB representatives recommend that any decisions about balancing commercial and recreational opportunities be based on the degree to which the fisheries achieve optimization of the social and economic benefits to Canada.

Seeking Your Views

Question 1:

Do you agree/support the recommendations on Areas of Agreement? If not, why?

Question 2:

Where there are Areas of Disagreement or Additional Considerations identified, do you prefer/support any of the proposed approaches? Please specify and provide reasons why.

Question 3:

Do you have suggestions on alternative approaches or any other suggestions?

Further Recommendations

Further Recommendations are specific recommendations proposed by the represented groups that go beyond the core allocation principles and focus on areas such as implementation, monitoring, evaluation or governance.

CATCH MONITORING AND ACCOUNTABILITY

- All groups agree that implementation of the allocation policy must be supported by robust fishery monitoring programs and transparent data.
- First Nation representatives and CSAB representatives recommend that salmon allocations include and account for total fishery mortalities associated with fishing activities, including retained and non-retained salmon. They also recommend the development and overhaul of catch monitoring programs in order to be accountable for caught (retained and non-retained) fish; increasing the price of recreational license fees for the purpose of improving recreational catch monitoring programs; and that DFO should facilitate and support data sharing to improve the management of Pacific salmon fisheries.

ENHANCED STOCKS

- First Nation representatives noted that First Nations seek to benefit from the harvest of hatcheries operating in their territories, including a share of salmon coming back to spawn in their local waters. First Nation representatives recommend that the first opportunity to access any surpluses identified must go to First Nations right-based fisheries. These fish may be sold subject to certain harvest, stock assessment and reporting requirements. If the First Nations decline the offer to harvest the identified surpluses, the fish will be offered for sale through public tender.
- Five Nations further recommend that the policy provide direction on enhancement practices, noting that enhancement should be used strategically to sustain fishing opportunities while limiting impacts on wild salmon.

REGION-BASED LOCALIZED MANAGEMENT

- First Nation representatives have recommended that the new SAP incorporate as a concept “Regional Allocation Boards” which would be responsible for making allocation and management decisions at more local, sub-regional levels (e.g. watersheds) and support place-based decision-making using a Nation-to-Nation collaborative governance structure that welcomes input from public fisheries. The 1999 policy included a commitment to an impartial allocation board with coastwide responsibilities.
- In general, the potential value of localized decision-making processes was broadly recognized. However, further work would be required to determine the viability of supporting such processes, which groups would participate and how, the structure of the boards, roles and responsibilities, and their scope and scale.
- The SFAB representatives indicated they would be supportive of roundtables for cooperative fishery management plan development for very terminal fisheries and on a local scale using the coastwide allocation policy.

EVALUATION

- First Nation and CSAB representatives have recommended the inclusion of an evaluation section to ensure that the SAP is achieving its objectives. This section could include a commitment to develop an evaluation framework. In addition, annual post-season harvest data can be used to indicate the extent to which the SAP is being implemented as intended. This may require greater transparency in allocation and harvest across all fisheries.
- First Nation representatives recommend the SAP be reviewed according to a defined schedule to ensure that any necessary updates are implemented.

Next Steps

What is the process to finalize the BC SAP Review?

DFO will compile the feedback received through this consultation process and share it with the First Nations-DFO Committee and Multi-Party Working Group for their consideration.



The First Nations-DFO Committee and Multi-Party Working Group will meet in early 2026 to review the feedback and perspectives received through this consultation process, as well as review the proposed options that will inform the Minister's final decision.

For issues where agreement has not been reached, the Minister will be provided with the recommendations accompanied by information that reflects the perspectives of the groups. A summary of *Related Issues* that DFO has deemed not in scope will also be documented and shared with the Minister for consideration. The First Nations-DFO Committee may also submit a supplementary report on the proposed options to accompany the recommendations package.

What is the deadline to provide feedback?

Feedback on the recommendations that have been proposed for the renewed SAP must be emailed to DFO.SAPReviewBC-PASRevueBC.MPO@dfo-mpo.gc.ca no later than **January 23, 2026**.



Glossary

ACRONYM/TERM	DEFINITION
Bycatch	The inadvertent harvest of different species than the target species. Bycatch includes retained and non-retained catch.
Commercial Salmon Allocation Framework	This allocation framework sets out fixed shares of all five Pacific salmon species for each of the commercial salmon fleets for identified commercial salmon fisheries. Allocations are included in annual Integrated Fisheries Management Plans.
Conservation	The protection, maintenance, and rehabilitation of genetic diversity, species, and ecosystems to sustain biodiversity and the continuance of evolutionary and natural production processes.
Consultation	<p>Consultation is the process by which DFO works collaboratively with individual First Nations and groups, and other stakeholders to gather input on policies, programs, services, legislation, and other initiatives that impact them or align with their interests. The purpose is to provide a transparent mechanism for participants to share perspectives on proposals, helping to inform decisions, reduce risks, and demonstrate how feedback has been incorporated.</p> <ul style="list-style-type: none"> • Results are documented, showing how received input has influenced final decisions • May be statutorily mandated or arise from legal obligations based on constitutional requirements in respect of Aboriginal and Treaty rights under s.35 of the Constitution Act, 1982, Canada’s commitment to implement UNDRIP, and reconciliation commitments including the Principles Respecting the Government of Canada’s Relationship with Indigenous Peoples.
First Nations Right-Based Fisheries	First Nations right-based fisheries implement Aboriginal and treaty fishing rights protected by Section 35(1) of the <i>Constitution Act, 1982</i> and are recognized via a court decision and/or treaties.
<u>Fishery Monitoring Policy</u>	This policy sets out the direction for fishery monitoring in Canada’s federally-managed wild capture fisheries.
Fishing-Related Incidental Mortality (FRIM)	Includes all mortality associated with fishing activities, beyond the mortality accounted for in retained catch. FRIM includes estimates of mortality rates for fish that encounter fishing gear but are not captured (e.g. escape mortality), that are dead upon or die during capture (e.g. on-board mortality), or that die after release (e.g. post-release mortality).
Incidental Harvest	The inadvertent harvest of non-target stocks (including stocks of concern) within the same salmon species (e.g. Cultus Lake Sockeye when harvesting Summer Run Sockeye).

ACRONYM/TERM	DEFINITION
Integrated Fisheries Management Plan (IFMP)	Integrated fisheries management plans are used to: <ul style="list-style-type: none"> • guide the conservation and sustainable use of marine resources; • support the management of sustainable fisheries; and • combine science and Indigenous traditional knowledge on fish species with industry data to determine best practices for harvest.
<u>A Policy for Selective Fishing in Canada's Pacific Fisheries</u>	This policy, adopted in 2001, outlines principles that ensure the adoption of selective fishing technologies and practices where appropriate. It emphasizes ongoing improvements in harvesting gear and related methods across all Pacific Region fisheries.
<u>Policy on Managing Bycatch</u>	This policy sets out the direction for retained and non-retained bycatch.
<u>Precautionary Approach</u>	In general, the precautionary approach in fisheries management is about being cautious when scientific information is uncertain, unreliable or inadequate and not using the absence of adequate scientific information as a reason to postpone or fail to take action to avoid serious harm to the resource.
<u>Sustainable Fisheries Framework</u>	The Sustainable Fisheries Framework provides the basis for ensuring that Canadian fisheries support conservation and sustainable use of resources. The framework: establishes a precautionary approach to fisheries management, provides the basis for an ecosystem approach to fisheries management, includes tools to monitor and assess environmentally sustainable initiatives, and combines new and evolving fisheries management policies with current ones.
<u>Wild Salmon Policy (WSP)</u>	The goal of <i>Canada's Policy for Conservation of Wild Pacific Salmon (Wild Salmon Policy)</i> adopted in 2005, is to restore and maintain healthy and diverse salmon populations and their habitats for the benefit and enjoyment of the people of Canada in perpetuity. This policy goal will be advanced by safeguarding the genetic diversity of wild salmon populations, maintaining habitat and ecosystem integrity, and managing fisheries for sustainable benefits.

Appendix A - SAP Working Group and Committee Membership

First Nations – DFO Committee	Multi-Party Working Group (MPWG)
<p>14 primary members (not including alternates and observers)</p> <ul style="list-style-type: none">• Five Nations (Hesquiaht First Nation) (2 primary participants)• FNFC (1 primary participants)• Fraser Salmon Management Council (FSMC) (2 primary participants)• Haida Nation (1 primary participant)• Island Marine Aquatic Working Group (1 primary participant)• Alliance of BC Modern Treaty Nations (1 primary participant)• North Coast Skeena First Nations Stewardship Society (NCSFNSS) (1 primary participant)• Nuu-chah-nulth Council• Okanagan Nation Alliance (1 primary participant)• Skeena Fisheries Commission (1 primary participant)• DFO (2 primary participants)• Province of BC (Observer)	<p>18 primary members (not including alternates and observers)</p> <ul style="list-style-type: none">• First Nations (8 members: including 1 FSMC, 1 from the Alliance of BC Modern Treaty Nations, 1 from IMAWG, 1 from NCSFNSS, 1 from SFC, 1 from Haida Nation, and 2 from Five Nations)• SFAB (4 primary participants, including North, South, Main)• CSAB (4 primary participants, including one from each gear type)• DFO (2 primary participants)• Province of BC (observer)

Appendix B – Related Issues

Related Issues

ALLOCATION PRINCIPLE 1 – CONSERVATION

- Test fishing allocations are included as part of conservation and are guided by [Section 10 of the Fisheries Act](#). First Nation representatives have requested opportunities for First Nations to operate test fishery programs and retain fish caught for FSC purposes.

ALLOCATION PRINCIPLE 2 – FIRST NATIONS

- First Nation representatives raised a range of concerns with how right-based fisheries are implemented, including how allocations for right-based fisheries are determined, whether they meet community needs, and/or represent “generous and liberal” interpretations of the right (allocations for individual First Nations will not be defined in the SAP).
- First Nation representatives also recommended that the policy outline how First Nation commercial fishing rights could be formally recognized (i.e., outside of Court decisions and treaties).

ALLOCATION PRINCIPLES 4 AND 5 – RECREATIONAL ALLOCATION AND COMMERCIAL ALLOCATION

- First Nation and CSAB representatives recommended the creation of a separate licensing category (and associated fees) for recreational fishing businesses (e.g. lodges, guides and outfitters), and that further input controls be explored for managing the recreational fishery.
- The SFAB recommends that as commercial fishing licenses are retired through buy outs, that there be a commensurate decrease in commercial allocation to reflect the intended transformation of harvest.

PROPOSED ALLOCATION PRINCIPLE – BYCATCH AND INCIDENTAL MORTALITY (IM)

- First Nation and CSAB representatives raised concerns about salmon bycatch in other fisheries (specifically Chinook caught in the groundfish trawl fishery) and suggested that the salmon allocation policy address this. However, given that the SAP focuses on salmon directed fishing activities, this is considered by DFO to be outside the scope of the policy, but will be included as a related issue for the Minister.
- First Nation representatives and CSAB representatives recommend that the bycatch and incidental mortality rates used in fisheries management be updated in collaboration with academia and based on sound data.