



Yukon Salmon Sub-Committee
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June 11, 2020

Honourable Bernadette Jordan, M.P.
Minister, Fisheries and Oceans Canada
200 Kent Street, Station 15N100
Ottawa, ON K1A 0E6
min@dfp-mpo.gc.ca

Dear Minister:

Re: 2020 Yukon River and Porcupine River Drainage Annual Salmon Fishery Recommendations

Thank you for considering the following recommendations for the annual Yukon River salmon fishery. They also reflect the results of our pre-season engagement cycle, which occurred under pandemic conditions. We met (by remote communication) with as many Yukon First Nations, Renewable Resources Councils, stakeholders, interest groups, and Yukon residents as possible. However, we were constrained by a delay in the release of funding upon signature of our contribution agreement. The agreement was signed on April 23, 2020 but funding was not received until May 22, 2020. As a result, we could not carryover any of the preceding year's budget and we were limited in the extent to which we could engage.

Notwithstanding this uncertainty, please accept the following recommendations pursuant to section 16.7.17.12 of our mandate under Chapter 16 of the Yukon First Nation Final Agreements, which we submit consistent with the process outlined in section 16.8.4.

Recommendation 1: No allocation to the public angling, domestic or commercial fishery for Yukon River Chinook

The pre-season run estimate for Chinook salmon will not allow for the full (10,000 Chinook) First Nation fishery. The First Nation fishery is the priority fishery established under both the Yukon First Nation Final Agreements and the *Yukon River Salmon Agreement*. This means that no other fishery allocation should be made available if the First Nation fishery is to be constrained, limited or otherwise restricted. Stock projections are, of course, not perfect. If there is an unexpected abundance of Chinook salmon in 2020 that will completely satisfy the First Nation fishery, the possibility of a licensed fishery should be considered in-season. Any licensed fishery should only be allowed if modern fishery management tools and practices are met and if there are adequate controls on the fishery.

Recommendation 2: Continue with conservative harvest for Yukon River Chinook; open fisheries for Yukon River chum; and accept the management of Porcupine Chinook, chum and coho on the basis of in-season data

A conservative harvest is prudent given the sustained decreased level of Chinook salmon stock abundance. We also have a far from perfect knowledge of the annual distribution and relative populations of Chinook. There is likewise uncertainty in the abundance data, particularly during the early portion of the run. Given these unknowns, it is reasonable to enter the season with a precautionary approach and a conservative harvest.

Mainstem Yukon River and tributaries above the Alaska/Yukon Border Salmon Fisheries

The YSSC is recommending all levels of government manage their fisheries with a conservative harvest (or no harvest opportunity at all, depending on in-season run abundance).

Chinook are in a sustained period of low productivity and abundance and there are growing concerns over the quality of escapement. While the spawning goal has been met in recent years (with the exception of 2019), there was nevertheless a period of time where it was not met or barely met. This came at the expense of harvest opportunities in all Yukon River salmon fisheries. The recovery of Yukon River Chinook has been complicated and delayed through generally decreased total spawning population size since the late 1990s and low production. Exceeding the lowest end of the spawning goal will be essential to long-term recovery. As such, harvest opportunities should be managed conservatively and adequate Chinook should be allowed to spawn to seed this great river.

Chum salmon abundance has supported all fisheries in Canada, in recent years. Subject to in-season information, we will encourage the use of chum and recommend that fishers harvest the latter species where they are present. Pre-season predictions are that chum abundance, while lower than in previous years, should be able to continue to support all First Nation and licensed fisheries on the mainstem.

Porcupine River Salmon Fisheries

The harvest of salmon in the Canadian Porcupine River is conducted by Vuntut Gwitchin citizens and the Vuntut Gwitchin Government (VGG). It is managed by the Porcupine River Community-based Salmon Management Plan. Populations of Porcupine River Chinook and chum salmon are counted at the Porcupine River sonar downstream of Old Crow. The VGG is therefore in an excellent position to manage their Chinook and chum fisheries in a prudent and sustainable fashion. The VGG do so in the context of a rapidly changing climate. They were among the first to declare a state of climate emergency. They are factoring the effects of climate change into the management of their natural resources.

There is a late migration of coho salmon in the Porcupine River. These coho are not counted but support a fishery when river (weather) conditions allow. The YSSC supports the VGG and DFO's interest in this population. We encourage the allocation of additional time and resources to better understand and document this population.

Recommendation 3: Use of 6 inch or smaller mesh size in all gill net fisheries

We continue to advocate a mesh size of 6 inches or smaller in all fisheries, including subsistence fisheries. We recognize that most Yukon First Nations have already implemented these mesh size restrictions. We recommend that DFO pursue regulatory amendments for the licensed fisheries. In the interim, any domestic or commercial Chinook fisheries undertaken in 2020 should have 6 inch or smaller mesh size included as a condition of licence.

Should there be a licensed Chinook fishery, smaller mesh size will result in the capture of fewer large Chinook females and an increase in the capture of smaller, younger and more abundant male fish. This gives the large and valuable females a better chance of reaching upstream spawning grounds. Similarly, the 6 inch mesh in the chum fishery will also reduce the catches of late running Chinook. This mesh size restriction should not limit chum harvesters as it is known on the Yukon River as chum gear.

Recommendation 4: Release of unharmed female Chinook salmon

While it is difficult to determine the survival of released 'unharmed' female Chinook from a net, we believe that it should be a best practice for the management of subsistence fisheries and a condition for licensed fisheries.

Recommendation 5: Provide standard openings for licensed chum fisheries to target food quality chum

The licensed chum fishery is concentrated near Dawson City and in the Minto area. It supports a near-artisanal licensed fishery that satisfies local needs and increases local food security. The fishery occurs in the autumn and is highly vulnerable to decreasing temperatures as the season progresses. Additionally, the chum with the highest quality flesh are found early in the migration. In 2019 DFO delayed the opening of the chum licensed fisheries to eliminate incidental Chinook harvest and opened this licensed fishery late. This made it difficult for this fishery to harvest consistently high quality chum.

Conclusion

If environmental conditions are outside those normally experienced or if the information regarding the abundance or quality of escapement differs from those expected the YSSC may consider submitting additional in-season recommendations.

In formulating our recommendations, the YSSC considered the views expressed to us through both formal and informal channels. We weighed them with the experiences and opinions of our own membership. In closing, we want to thank you in advance for your anticipated attention to our recommendations. We look forward to receiving your response and remain committed to working with Yukon First Nations, DFO, Renewable Resources Councils, stakeholders and all other Yukoners as we promote and protect Yukon salmon and their habitats.

Yours Truly,



James MacDonald
Chair, Yukon Salmon Sub-Committee

CC: Steve Gotch, Director, Fisheries and Oceans Canada

Attachment



What We Heard – Yukon Salmon Sub-Committee 2019/2020 Engagement

YSSC would like to share what we have heard (so far) from YFNGs, NGOs, and public during our pre-season engagement and previous meetings leading up to YSSC's Yukon River salmon recommendations to the Minister of DFO. The below list are the popular comments we heard from a broad audience, but does not reflect every view we heard. The bullets under Salmon Season will likely be the basis for our pre-season Recommendations. The points under **Additional comments and suggestions** may be used at a later time for additional letters of recommendation to the Minister.

Salmon Season Recommendations:

- Based on the pre-season forecast, no Chinook allocation to the public angling, domestic, or commercial fisheries
- Conservative mainstem Chinook harvest, open chum fisheries
- Manage Porcupine salmon based off the in-season data
- Use 6" or smaller mesh
- Release unharmed female Chinook
- Standard commercial chum openings

Additional comments and suggestions:

Food Security:

- Concerns over food security will likely result in increased harvest this summer due to the pandemic
- Try to direct fishers to chum and conserve Chinook
 - Some initiatives underway to increase the value of chum as food
- Need standard openings in the chum commercial fishery. Delayed openings decrease chum quality and shorten the commercial fishery due to winter conditions.

Chinook Conservation:

- Work with Alaskans to establish a mid-river assessment site. This is needed!
- Fishers should be using a maximum 6" mesh size
- There should be a contingency around spawning escapement to make sure it is achieved every year
- Habitat data, especially water temperature, is valuable and needs to be collected
- Very few Chinook are captured in the chum commercial openings, don't need to restrict this fishery to decrease Chinook 'bycatch'
- Need a Yukon River wide salmon management plan
 - Need to talk about what we are going to do, not just the numbers
 - Need harvest sharing accord among Yukon FN
- FN were nomadic and let the land 'rest', need to consider doing this again
- Ensure managers consider environmental conditions when setting harvest allocations

Chum Conservation:

- Fishers should be using a maximum 6" mesh size
- A lot of concern over Porcupine chum and the continued suppressed run and relatively large US harvest
- Interest in Kluane chum as this year is the first returning offspring since the river
- Ensure managers consider environmental conditions when setting harvest allocations

Harvest:

- Harvest data needs to be improved, currently it is calculated more than reported which leads to concerns over the quality and implications for the science and the perception that Canadians don't need salmon
- Need to develop a better reporting process with DFO for FN harvest
- Increasing interest in partnerships with DFO to monitor the fishery to provide training opportunities and to increase harvest reporting
- A lot of interest in having someone on the grounds to collect harvest data
- Harvest numbers don't communicate the story as often there aren't enough salmon to catch (too much effort)

Chinook Spawning Escapement Goals:

- Spawning Escapement goal needs to be increased
- There should be FN participation in the development of the new escapement goal
- Goals should consider quality of escapement

Yukon River Salmon Agreement (YRSA):

- The YRSA needs to be renegotiated to include penalties for not meeting treaty obligations (spawning escapement/harvest shares)
- The YRSA should include updated spawning escapement goals
- It should include provisions for review and updates to the YRSA
- Salmon populations have changed and the YRSA needs to be renegotiated

Additional Concerns/Interests:

- Would like to see a presentation on Arctic Salmon at the next YRP
- Salmon Summit should be hosted for fishers along the river to meet
- TK needs to be considered in-season and postseason
- Some people don't know how to fish, need to keep the culture and knowledge going