

From: Mark Thulin
Date: January 11, 2026 at 1:53:34 PM PST
To: DFO.SAPReviewBC-PASRevueBC.MPO@dfo-mpo.gc.ca
Cc: Roger Gage, Mike Finn
Subject: **Salmon Allocation Policy Review**

Hi, please see the attached response from the Board of Directors of the Tyee Club of British Columbia to the Salmon Allocation Policy Review.

The Tyee Club of British Columbia supports the continued recognition of salmon as a common property resource, with constitutionally protected First Nations fisheries taking priority for conservation, food, social, ceremonial, and treaty-defined purposes. After these needs are met, the Club strongly supports maintaining the existing recreational priority for chinook and coho salmon ahead of directed commercial fisheries, as established in the 1999 Salmon Allocation Policy. This priority remains justified by unchanged economic evidence showing that recreational harvest of these species delivers significantly greater social and economic benefits to Canadians.

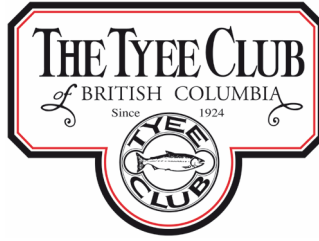
Proposals to replace priority access with fixed recreational caps would undermine predictability, increase in-season closures, and jeopardize historic fisheries such as the Tyee Club fishery.

The Tyee Club urges the federal government to retain region-wide allocation principles administered by DFO and to maintain the existing recreational priority for chinook and coho salmon as the highest and best use of this public resource.

Respectfully,

Mark Thulin, Director
Tyee Club of British Columbia

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Salmon Allocation Policy Review

To whom it may concern,

The Tyee Club of British Columbia was founded in 1924 to bring consistency to the emerging recreational fishery for the large chinook salmon that gather near the estuary each summer before heading into the Campbell River to spawn. Criteria for tackle, minimum weight of fish, prohibition on the use of an engine when fishing and other considerations for an angler to qualify for club membership were developed and have remained essentially unchanged a century later. Information on the club history, objectives (including stewardship of the Campbell River watershed) and catch history can be found at www.tyeeclub.org.

The Tyee Club was an original participant in the Area 13 Sport Fishing Advisory Committee, part of the region-wide Sport Fishing Advisory Board, when the SFAC was instituted in the mid-1970's and has remained active in this advisory and consultation process ever since. The Club has followed reporting on the Salmon Allocation Policy (SAP) review since the beginning of this process and would like to provide the following input:

- Maintenance of the status of salmon as a common property resource and the ability of non-indigenous Canadians to continue to access these fish by virtue of a right founded on common law is essential to the future of the Pacific region recreational fishery. The Tyee Club acknowledges the priority of the constitutionally protected rights of First Nations but *cannot accept the reduced status* that would occur should non-indigenous access to the salmon resource

become that of a privilege with access allowed, or not, according to the mind-set of the government of the day.

- The Tyee Club supports the priority of allocation to salmon afforded to First Nations for Food, Social and Ceremonial fisheries and treaty and court defined sale fisheries before recreational and commercial fisheries for salmon can proceed.
- The Tyee Club believes that after the needs of conservation and the fisheries noted above have been addressed, the existing priority access to chinook and coho for the recreational fishery before directed commercial opportunity can proceed should be maintained. DFO surveys have found that chinook and coho are the target species of choice for a majority of anglers in the Pacific region. While opportunity for sockeye, pink and chum salmon, along with other species such as halibut, lingcod and shellfish are all valued, opportunities for chinook and coho are the core feature upon which the regional recreational fishery and its infrastructure is based. This belief is founded on the principle that a chinook or coho salmon caught in the recreational fishery provides the largest social and economic benefits to Canada compared to one caught in the commercial fishery. The comparative economic data from the two fishery sectors was the basis for the recreational priority afforded to it for chinook and coho in the original (1999) Salmon Allocation Policy and nothing has changed since then to diminish the logic of this decision. As well, maintaining the existing priority would continue the essentially unmeasurable but very large social benefits that hundreds of thousands of Canadians and visitors to this country derive each year from a well-managed recreational fishery that provides consistent access to the salmon resource.
- Some participants in the SAP Review process have stated they believe that economic data has no place in determining salmon allocation and should not form part of the briefing package sent to the minister to be considered in the decision-making process for a renewed policy. Although the monetary aspect of our club fishery is fairly limited, the Tyee Club believes the opposite, that

economic data from all the relevant fisheries is an essential component of the allocation decision making process.

- Examination of the Pacific region catch records for chinook and coho salmon in both the commercial and recreational fisheries for the years 1999 – 2024 show that even with priority access the recreational fishery only caught approximately half of the aggregate commercial and recreational chinook and coho landed catch. It cannot be said that under the existing allocation policy the commercial fishery for these two species has been unduly constrained.
- Proponents of ending the recreational priority to chinook and coho salmon have proposed that in a renewed policy both the commercial and recreational fisheries for chinook and coho be managed to a fixed allocation or cap in numbers each year. Implementation of this management model in the recreational fishery would severely undermine the predictability (subject only to conservation measures) the recreational fishery enjoys. The current halibut allocation model of the recreational fishery having a poundage cap based on a 15% share of the combined commercial/recreational TAC does not provide a reassuring precedent, as in-season closures and variable maximum size constraints have become a constant reality in that fishery. With a fixed numerical cap for chinook and coho salmon it is almost certain there would be closures mid-season, eroding if not ending any certainty of opportunity. Given that its particular fishery does not begin each year until early August, *the now historic and unique Tyee Club fishery would be in real jeopardy were the fixed allocation model implemented*, as any chinook salmon available to the recreational fishery might very well have already been caught elsewhere before our club fishery even began.
- Some participants in the SAP review are advocating for the creation of local or sub-regional allocation boards. Other than local multi-sectoral “round table” processes dealing exclusively with local origin salmon stocks in terminal areas the Tyee Club does not support the creation of more allocation boards. Given the highly migratory nature of salmon and the wide range of harvest groups (both in geography and gear-type) that seek to catch them the Tyee Club strongly

believes salmon fishery management should continue to be structured on a common set of region-wide principles administered by a central governing authority (i.e. DFO).

The Tyee Club of BC can only hope that the federal government makes the right decision by choosing the highest and best use for all Canadians with this common property resource and maintains the existing priority of the recreational fishery over the commercial fishery in providing directed access to chinook and coho salmon.

Tyee Club of British Columbia board of directors.

January 15, 2026