

My name is Bob Rezansoff I'm the president of the Fishing Vessel Owners Assoc. of B.C., a director of Area B and Area A seine Assoc., director of the Commercial Salmon Advisory Board, President of the Herring Conservation and Research Society and a member of the Herring Industry Advisory board . I was a member of the Judge Williams inquiry, The Judge Toye sports and commercial committee, participated in the Stephen Kelleher allocation discussions and in past lives was the Pres. of the Pacific Salmon Seiners Assoc. and a member of the Pacific Salmon Harvesters Assoc which lead to the formation of the CSAB. I was one of the spokesmen for the original survival coalition in the 1980's which was industries response to the original Pearce report. I was also a participant in the second survival coalition in the 1990's , industries response to the imposition of the Aboriginal fishing strategy. Finally I was one of the director's of the Code of Conduct for Responsible Fishing. Canada's response to FAO obligations. Sad to say but I've watched a lot of water go under the keel and a lot of problem's remain unresolved and festering despite the advice of many experienced people like myself.

First let me address the question on sustainability of the Fraser sockeye. This question is framed in a much too narrow a perspective. It should be inclusive of the sustainability of the fishing industry as an integral part of the discussion. If in fact it was only the sustainability of the sockeye itself that was in question then the answer is relatively simple. Curtail all fishing, disband DFO and let nature take care of itself. Lets be clear DFO is not managing fish it is managing the access to that resource, the fish can manage themselves quite well without humans. I realize that in question #4 you address the harvesting of sockeye. However my point is that if you separate the sustainability of the resource and the sustainability of the harvesting sector you can reach entirely different conclusions to the first question. It may seem a minor point of language semantics but there is no doubt in my mind that the two points must be considered as a whole. The public submissions to your web site reflect the disconnect in the public's mind of these two issues.

With respect to the answer to the combined question itself I would say that the pendulum has swung too far in the direction of conservation for conservations sake and doesn't take into account the detrimental effects of today's escapement and weak stock policies on the stronger stocks and the industry. One of your previous panel members Dr. Walters emphasized this point in a recent radio interview. Dr. Walter's and Dr. Riddell coauthored a paper that pointed out there were downsides to over escapement . There is research In Alaska that makes this point and uses several Canadian systems in the research. There was in place a very successful harvesting regime for close to a century on the Fraser and other major systems in B.C. It has only been fairly recently that the system was changed. In fact I recall approximately 15 yrs ago a biologist working for a first nations group declaring at PSARC " we are no longer in production mode we are in conservation mode" I think the results of that mode are reasonably clear and coincide with the perceived decline of the resource. Where we once had a thriving viable industry that provided employment and decent incomes for myriads of individuals of all ethnic backgrounds on the entire coast we now have a crippled industry that struggles to survive and has difficulty in processing a catch of any magnitude. This decline has occurred in spite of dramatic reductions in fleet size and exploitation levels. In many years there has been no fishing however the cry of over fishing remains unabated and is now coupled with climate change as a casual factor. I think its time to examine in close

management regime is woefully inadequate in both of these respects. There are fisheries that answer to no one with respect to their accountability. If Fraser sockeye is to survive as a shared resource this situation must be resolved. It is simply not acceptable for any sector to have fisheries that are unregulated with respect to allocation and do not provide accurate timely accounting. DFO is shirking their responsibility by not addressing these points. Your advisor Mr Ionson, a former DFO employee, during the Williams inquiry felt it was not proper for DFO to require such information from the first nations sector although he insisted on the same from the commercial sector. I put it to you that it is impossible to have a sustainable fishery without proper allocation and accounting. If Mr. Ionson's view is the gov't view then you and I and everyone else are wasting our time in this inquiry. I accept that economic fisheries are reasonably well accounted for, in most but not all cases. But there are substantial unreported fisheries that are unaccounted for. In a lot of cases because it's politically expedient to avoid confrontation over the issue.

To illustrate this let me make an observation from the William's inquiry. During testimony an ex DFO employee stated there had been a 30% "BENIGN" management adjustment. I challenged why there had been a 30% add on to escapement under benign environmental conditions. Why was there a 30% add on to escapement if environmental conditions were benign? After much prodding it was made clear that this was to account for the unreported harvests beyond the Mission counting. While in a year such as this such unreported activity would have a negligible effect it would be detrimental under other circumstances.. So in conclusion I would hope that your conclusions would deal with these two issues.

Question #3. I'll just make two observations on habitat issues. Firstly even though it's motherhood it's absolutely imperative that sockeye and all other salmon have an absolute priority to water resources on their spawning grounds. This is especially important for stocks such as coho which are small stream fish. While this may seem self evident I think in many cases salmon and small streams and watersheds take second place to agricultural and other industrial needs. Society will have to decide which is more important a second crop of irrigated hay or survival of salmon. If this province is to sustain this resource this access to water has to be rigorously enforced. Likewise the remaining foreshore in the Fraser estuary has to be protected at all costs. In my lifetime the estuary foreshore has been dramatically and detrimentally altered by development.

The second point is with respect to pre spawn mortality and the issues around that. For some time now sockeye have been displaying pre spawn mortality. This leads to environmental adjustments that in some cases preclude harvesting in the approach areas and is suggested to be a habitat issue. DFO uses Fraser water temperature as the best indicator for the potential of pre spawn mortality. That's not say that temperature is the only cause but it gives the easiest measurable indicator of this potential effect. I refer you to the 2009 post season CSAB wrap up information from DFO. The temperatures were above the 1942-2008 mean range in cases significantly so. However the pre spawn mortalities were remarkably lower than in other recent years. 5% on the early Stuart and early summer stocks, 1% on summers, 0% on Birkenhead and 7% on lates. So you might ask what was the difference that led to high temperatures and extremely low pre spawn mortality? The missing factor was set net fishing in the Fraser canyon. This type of fishing is conducted in the canyon back eddies where sockeye go to rest before attempting the next spot of fast current.. In recent years this fishery has been conducted

on a much larger and more virtually continuous scale. I realize this is a constitutionally protected fishery but I do make the point that it's fairly obvious there are unaccounted detrimental effects to this activity and some mitigation of this activity should be considered. Once again it brings us back to allocation and accountability.

Question #4 On this question I must state once again that these are my own personal views. The industry has a divided view on this issue on the one hand some think a simple return to the previous harvesting regimes would solve everything. My view is that a return to the past is just wishful thinking. Like it or not we are no longer the only user group any longer. Therefore as a starting point for the commercial sector the internal allocation system has to be restructured. The present system is totally unworkable and should be scrapped. The CSAB has attempted to do so for some time and has not been successful, mainly because DFO while outlining what it sees as the future is extremely reluctant to bring the issue to a conclusion. There are however several "pinch points" in resolving this issue. The most contentious might be the "sports priority" to Chinook and Coho. I was one of the participants in the discussions under Judge Toye that led to this priority access. Without laboring the point I'll just point out that this priority was granted in exchange for a "market based" mechanism that was supposed to leave unharmed individuals that chose to remain in the industry. DFO under Minister Anderson chose to ignore this aspect of the agreement rendering the whole thing a "sham". This point in turn makes it difficult to resolve internal industry allocation differences while it remains missing. I suggest as a starting point this market mechanism be implemented. Secondly industry be given a definite timeline for restructuring of its internal allocations but only after the policy issues around escapement and weak stock policies are resolved. One only has to look at the promises of the "Mifflin Plan" and the effect on them of policy changes to understand why it is important for industry to know what the rules are for the foreseeable future prior to resolving allocation. Finally in my mind an ITQ system that allows harvesting stocks in the most discreet manner possible has to be implemented for all sockeye and other salmon stocks. That approach coupled with cost effective validated accounting for all sectors both first nations and all citizens is a must. Another important point is that the management of the resource has to be depoliticized. I refer you back to Mr. Ionson's comments to the Williams inquiry. Here is a DFO employee whose mandate is supposed to be the health of salmon resource and his view is that he cannot request timely and accurate accounting of numbers because that would be an infringement of rights. It was impossible for Mr. Ionson and remains impossible for his successors to do their job while their department is hopelessly politicized in this manner. Advocacy for first nations has to be dealt with by a separate department of government. DFO has to be free to deal with the resource without wondering if they're treading on political toes. Their only function has to be the health of the resource. It is not possible to be even handed in application of management if politics is allowed to interfere in this manner. This politicization even extends into the salmon commission panel process. One of your researchers stated to the standing committee on fisheries that he wasn't concerned if a fish was caught illegally as a dead fish was a dead fish irrespective of how it was caught. I would have couched the question slightly differently, "if all the allowable catch was taken would you then be concerned about illegal fishing?" The point is there was a reluctance to admit that illegal fishing was wrong no matter who does it and yet this individual is supposedly offering unbiased advice. I would beg to differ. As this question

deals with a harvesting regime and the salmon fishery is larger than just the Fraser sockeye I'd like to add some recommendations that are more broad ranging than just the Fraser and sockeye.

Recommendations:

1. DFO should remind it's staff that it's the Dept of FISHERIES and Oceans. It would appear that at present the dept. searches for every possible reason not to fish. Moving back from that attitude would be a good start particularly with new staff many of whom have never seen never mind managed an active fishery.
2. Internally the same DFO staff is tasked with managing fisheries and also dealing with or advocating for Ist nation fisheries. I suggest that managing fisheries should be a stand alone section tasked with managing for all sectors. Ist nations advocacy should be a separate function with a budget that doesn't detract from the management of fisheries in general. This would at least give the appearance of equal treatment of all sectors. The previous comments about Mr. Ionson's views illustrate this conflict as do the conflicts over scheduling fishing on the Fraser.
3. DFO should return adequate funding to hatcheries and feeding smolts that are important to commercial fishing. Initially this could be confined to systems such as Nitinat ,Qualicum,Nootka and Barclay Sd. These were proven systems that gave a return for the \$ expended. The world of wild salmon is not going to end if a decision is made to restore these systems. They will not destroy the genetic diversity of salmon .However they would go a long way to restoring viability to industry.
4. DFO should revisit the bycatch limits on stocks of concern such as upper Skeena cohoe and Thompson cohoe . The present limits are dramatically restricting fishing while the existing allocation policy states that by catch necessary to conduct commercial fisheries on sockeye,pinks and chum are to be provided to the commercial sector. The restrictions on sockeye fishing this September highlight the cost of this restriction.
5. DFO should give a clear signal of their intentions with respect to defined shares or ITQ's. Keeping their collective heads buried in the sand while sending messages that this is the preferred option is not sufficient. If this is the preferred option then set a timeline for implementation.
6. DFO has to come to grips with the illegal unreported fishing problem.
7. DFO has to account for the undocumented mortality that can be attributed to recreational "snag fishing"on sockeye in the Fraser.
8. As a means to control illegal activities stringent traceability requirements should be placed on ALL commercially caught salmon .IF there are constitutional impediments to differentiating FSC fish then DFO should resolve the problem by clearly marking and tracking commercial fish.
9. DFO should re examine it's policies regarding competition for positions. At one time it seemed that management worked their way up through the ranks and had an understanding of the resource and the fishery they were managing. That corporate memory is rapidly disappearing. Fish management is significantly different then other government departments and yet postings at management levels are being filled by totally inexperienced staff. An ex DFO manager used to make the comment that " managing fishing isn't like picking potatoes .They don't come in neat little rows.Sometimes you

have to go toes to toes and make decisions” You need background for that type of decision making capability.

ALLOCATION:

1. DFO should immediately take steps to resolve the unworkable allocation gridlock. The present open ended access to recreational interests without compensation or a market mechanism is a major impediment to reaching defined shares. In turn that makes treaty settlement mitigation impossible to define. The following steps should be implemented:

- a. establish a time table for the resolution of the recreational commercial impasse.
- b. appoint a committee to deal with the issue.
- c. Implement terms of reference that clearly define what is to be resolved and that the findings of the committee will be binding. In other words eliminate the backroom political lobbying that created this morass in the first place.
- d. following the resolution of the recreational commercial allocation issues follow the same format for the commercial allocation.

MITIGATION:

1. Appoint a committee to determine the mechanisms for treaty transfers. The committee should work with the allocation committee to deliver a workable mechanism.
2. This committee should be empowered to determine the level mitigation in terms of %'s and #'s of fish per lic. And the expansion factors that would govern transfers to different areas. In other words apply the full costing of treaty transfers.
3. The value of mitigation should be a determination of future earnings. There is a significant difference between the reverse bid process that leaves the fish with the remaining fleet and a transfer away from the commercial sector. In the first situation there should be no downward pressure on vessel prices as theoretically the remaining fleet should have greater access. In treaty transfers the opposite is true, access is reduced. An analogy of what is occurring in commercial fishing would be if the municipal government down zoned your property and then expropriated it at the reduced zoning value. After expropriation the property is up zoned to a higher value. I'm willing to bet if a municipality did that there would be immediate court actions. However in fishing your access is reduced, in effect down zoned, the license is bought transferred up river and access is increased or up zoned while the fisherman receives the down zoned value. It is said treaties are an obligation of Canada fishermen should not be forced to carry Canada's financial obligations

Ist NATIONS TREATIES and ECONOMIC OPPORTUNITIES;

Recommendations on this issue are very difficult to make. On the one hand it's clear that the time for a cooperative approach is here at the same time in situations where legal actions threaten access for non Ist nations industry has to respond accordingly. Therefore recommendations can have a split personality.

1. Industry should make every opportunity available to engage in cooperative approaches and discussions. The “salmon Table” and the Stuart Sigurdson “widening the circle” are examples of this approach.

2. All mutually beneficial initiatives should be considered .The agreements on Cultus exploitation rates are an example of this.

3. Properly mitigated treaties are essential for any of these approaches to succeed.

4. Both groups have to come to the table and resolve the issue of illegal unreported fishing. It is a major stumbling block to fostering cooperative relationships.

On the commercial side opposition to economic opportunities is fostered by the notion they provide a cover up for illegal unreported fishing activity. ITQ's could eliminate this problem.

On the Ist Nations side using constitutional rights as a means to deflect proper enforcement lends credence to the cover up aspect. It is to the benefit of both sides to deal with this issue realistically.

5. Both sides must realize that legal cases will continue to be an irritant but they should not preclude trying to establish mutually beneficial relationships outside of the legal arena.

POLICIES:

1. DFO should immediately establish a representative working group of industry, science management and ngo's to review the effects of weak stock management and escapement policies. The overall socio economic impact and biological goals of those policies need an in depth review.

In many cases these policies are used as a tool for reallocation by self interest groups who use conservation as the issue to preclude fishing in approach areas. It should be stated that ALL Fraser fisheries are mixed stock except the actual individual spawning grounds.

2. Once allocation issues are resolved a policy review committee should be established . The representation should be balanced with clear terms of reference and not be subject to political lobbying or interference..

These recommendations are all in the short to medium time frame. Whether they are implementable is another question. Many of them will attract the political lobbying that has troubled effective salmon management. Special interest groups are bound to ramp up opposition to changes to their favorite policies. I'm sure DFO won't be overly supportive as they'll actually have to make decisions and resist political lobbying. Politicians will gauge the effect on their chances of reelection and shy away from recommendations that might hinder those chances. In any case the recommendations are a personal perspective based on close to 50 years of fishing and almost 30 in the trenches of fishing politics.

Question #5. I only have one point to make on this question and the point is partially in response to comments made by a presenter at the Steveston open meeting. It was suggested that there was some improper funding with respect to sea lice research . In addition suggestions were made that there were problems with the peer review process that brought into question all of that research. I am tabling an article that outlines the pervasive influence of large charitable foundations in influencing fisheries science and fisheries management policies. The participant in Steveston basically questioned the science around sea lice that is generally supported by commercial fishing because of

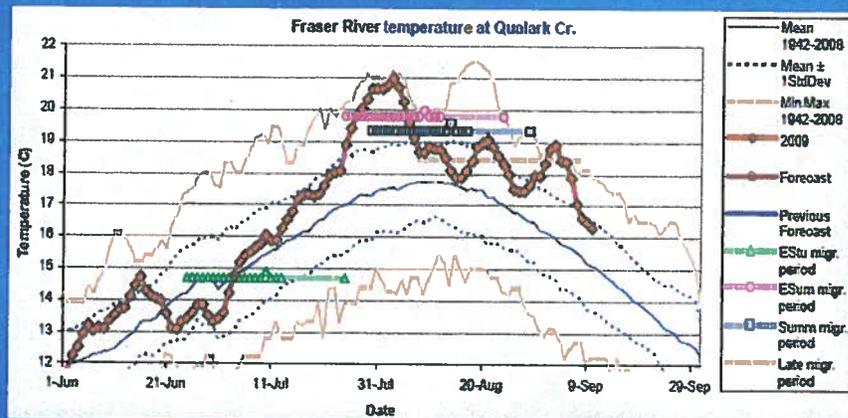
some funding issues. I think that throughout North America the influence of large charitable foundations in directing and forming public perceptions about commercial fishing far out weigh anything that might have happened in the sea lice issue. I might add that although the article is mostly directed to activities in the U.S. there are numerous connections to universities in Canada such as U.B.C. and Dalhousie. Some of these Canadian connections have made claims such as “All the oceans fish will disappear by 2048” or published research that man has fished his way down the food chain to the very bottom. Research that is now being disputed by more recent research from the University of Washington. These foundations have and continue to spend hundreds of millions on scientific research and media manipulation to color the public’s perception of commercial fishing. The comments around the disappearance of fish by 2048 while retracted somewhat by the researcher has never the less remained on the internet as factual with over a million hits. Vast amounts were expended to spread the information to the media virtually nothing has been done to point out the retraction.

The main point I’m making is that the general public should retain a healthy skepticism around supposed independent academic research. Most people have a definite aversion to biting the hand that feeds them and the charitable foundation’s hand is extremely generous . What most citizens read or see in their 10 sec sound bites is far removed from the day to day reality of the resource. One might also question why a foundation based on oil money is spending hundreds of millions to curtail commercial and recreational fisheries across North America.

In conclusion the public should remember that commercial fishermen were on the front lines of environmental issues before they were ever on the general public’s radar screen. Before Green peace, the world wild life foundation and others were even contemplated and finally eliminating the fishing industry might just be the first step towards damming the Fraser and offshore oil exploration.

Bob Rezensoff

Fraser Temperature Profile



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Lates

- Some Late sockeye appeared to hold for a short time near the mouth
 - US pink directed fisheries had area restrictions in place to keep them from catching any holding FR sockeye
 - The numbers holding in the gulf were estimated using a non-retention, non-destructive sampling PSC troll test fishery



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Exploitation Rates

	pre-season	in-season TAM+MA *	prelim. post-season
EStu	0%	0%	10%
ESum	43%	0%	9%
Summer	57%	0%	9%
BK **	60%	20%	6%
L.Lates **	20%	20%	3%
Cultus **	20%	20%	< 3%

* in-season allowable ERs are based on final in-season run size, MA and 2009 TAM rule

** BK, L.L. & Cultus ER identified for the purpose of catching available ESum & Summers – not for targeted fisheries on these groups



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Fraser Sockeye Escapement

Management Group	Escapement			
	goal @ final in-season run size	Predicted Escapement*	Preliminary Spawning Esc.	PSM **
Early Stuart	85,000	55,000	45,300	5.0%
Early Summer	175,000	110,000	103,700	5.0%
Summer	520,000	456,000	482,100	1.0%
Birkenhead+	48,000	NA	61,800	0.0%
L.Lates	320,000	299,000	495,800	7.0%
Total	1,148,000	920,000	1,189,400	4.0%

* based on preliminary post season catch & actual difference between estimates

** pre-spawn mortality

Birkenhead+ also includes Birkenhead type stocks



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