



The Honourable Joanne Thompson
Minister of Fisheries and Oceans Canada
The House of Commons
Ottawa, Ontario
K1A 0A6

January 23, 2026 BY EMAIL

RE: Concerns Regarding the Salmon Allocation Policy (SAP) Review

Dear Minister Thompson,

On behalf of the British Columbia Federation of Fly Fishers, we are writing to express our profound concern regarding the current trajectory of the Salmon Allocation Policy (SAP) review, specifically the proposal to retire the "common property" principle (Principle 3)—a move that would effectively cast the public's right to fish adrift in favor of commercial prioritization. Instead, we propose that Principle 3 be redrafted to articulate that fisheries should be managed in the 'public interest.'

The Role of the BCFFF in Salmon Allocation Policy (SAP) Discussions

The BC Federation of Fly Fishers serves as a vital representative for 'primary users'—the vast majority of the angling public who fish for recreation and food security rather than commercial gain. Unlike 'secondary users' (the commercial sport-fishing industry), primary users have no vested financial interest in harvest volumes; instead, our priority is the long-term biological viability of salmon stocks and equitable public access. While the Sport Fishing Advisory Board was originally structured to balance these two distinct groups, the BCFFF is deeply concerned that the board's current composition has shifted. Under the oversight of DFO Pacific Region management, the SFAB is now increasingly dominated by commercial interests that prioritize commercial profits over policies that serve the public interest.

This shift in influence creates a significant risk: the voices of hundreds of thousands of public anglers are being overshadowed by a concentrated commercial lobby. When secondary user interests drive the narrative, the resulting policy recommendations often favor industry-led opportunities at the expense of broader public participation. Because the SFAB currently lacks the necessary balance to advocate for the non-commercial sector effectively, the BCFFF is providing these independent perspectives. We urge the Ministry to distinguish between commercialized recreation and public access to ensure the Salmon Allocation Policy reflects the interests of all Canadians, not just those who profit from the resource.

The perspectives of the BCFFF on Salmon Allocation

The BC Federation of Fly Fishers believes that after conservation requirements and food, social, and ceremonial needs have been met, allocation should be determined in a manner that serves the Public Interest. In this regard, the term “Common Property” is unhelpful and should be replaced. We propose that Principle 3 be retained but rewritten to confirm that Pacific salmon are integral to all people – indigenous and non-indigenous and to the ecosystems of British Columbia today, and into the future. Because the resource is managed by the government for the benefit of present and future generations, the government should not grant proprietary interest or guarantee fixed catch shares. Instead, the government should direct allocation to salmon fisheries in a manner consistent with the law, that benefits society, and protects the benefits provided to all when salmon are not harvested.

To us, managing allocation to fisheries in the public interest means the following:

- Salmon stock assessment is comprehensive and up to date, so that the health of salmon populations are understood and properly communicated.
- All marine mixed-stock fisheries are adequately and independently monitored so the status and natal origin of salmon encountered in fisheries are known through the use of reference fisheries.
- All in-river fisheries are adequately and independently monitored
- All fishing related mortalities are accounted for, correctly assigned to their respective fisheries, are included in the assessment of allocation, and publicly reported.
- Allocation shifts away from marine mixed-stock fisheries that are non-selective, towards fisheries selectively harvesting salmon from known populations in a sustainable manner.

Protecting recreational access to Chinook and Coho

The BC Federation of Fly Fishers does not support the reallocation of Chinook and Coho from primary users of recreational fisheries to the commercial sector; however, we do believe that:

1. Sport fishing charter operators and other secondary users should become licensed.
2. The number of licences in the commercial recreational fishery should be limited.
3. Commercial sport fishing allocations should be transferable.

Salmon Allocation should prioritize conservation, facilitate the transition to selective fishing for all sectors, and implement new policies that clearly serve all sectors, including the broader society today and into the future.

Sincerely,

Myles Armstead, President

The BC Federation of Fly Fishers

Cc by email DFO.SAPReviewBC-PASRevueBC.MPO@dfo-mpo.gc.ca.