

Dear Board of Fish members,

I am petitioning the Board of Fish to take up the issue of illegal sales of salmon from the Yukon River, out of cycle.

The basis for requesting an out of cycle review is two fold; One, this resource has been dwindling from historical returns and has been placed by this Board as a stock of special conservation concern. Second, a semi-public three year Federal undercover investigation has revealed "widespread" and "rampant" illegal sales of Yukon Chinook salmon. Apparently many of which are originating from State waters.

Illegal sales without documentation of where the fish were harvested, who distributed the fish, who processed the fish, or who is selling the fish, is by definition a "black market" in Yukon Chinook salmon.

A black market in the rare and irreplaceable Yukon Chinook, places the species at undue risk.

As the volume of legal commercially caught Yukon Chinook salmon dwindles to virtually zero, the price of the fish on the black markets soars, which if unaddressed presents the real potential for an expanding black market in Yukon Chinook, placing the resource at further risk

The Yukon Chinook salmon is quite unique amongst salmon species, and as such may be irreplaceable, which only accentuates what is at risk.

Solutions proposed:

As with any black market in fish, the solution is documentation. All fish wherever they are taken need to be recorded in such a fashion that allows for the tracking of these fish, so that managers can be effective. The time for basic documentation has passed as the resource dwindles and the black market has become "widespread" and "rampant".

For subsistence fishermen in the "problem" area, they should have to fill out a landing log for submittal at the end of the season. This is a no part and parcel of good fisheries management. I am not fond of paperwork, but the logging of catches is a standard practice, and should come as no surprise. I would suggest a simple form that subsistence fishermen could download online. What they caught, when they caught them, where they caught them, and what they are going to use them for.

It is important that the fishermen be required to fill in the form after each set is retrieved. Then an officer has something to review for accurate reporting. Logs should be sent in at the end of the season eliminating the expense of field surveys and the resulting potential inaccuracy and expense of field surveys.

Fishermen should be required to sign the logs after each catch attesting to its' accuracy.

If the fish is destined for "trade" they should be required to log this in. This a fuzzy area, but the State already requires reporting of fish transiting the State, even if they were not landed in State waters.(Sec 16.05.251(16)). If the fishermen would like to exercise their legal rights to fish for barter or trade, then they should be required to be upfront and divulge upon harvest that is where the fish are destined.

The Board might legally be able to require that any legal sales of customary trade be processed through legal processing channels like State licensed processing plants, once again creating a documentary trail that will ensure that sales of seafood from the State of Alaska are not only legally taken from a commercial fishery, but are also processed with documents to their source and health safety. It is only going to take one case of salmonella or botulism to create a trail of legal liabilities and potential reputation destruction of Alaska's valuable seafood industry.

This fishery is managed by mathematics, and getting accurate data is critical to ensuring good management, and documentation of precisely what is being harvested will only strengthen the management of this resource.

The documenting all takings of Yukon Chinook, would further the Boards' mandate to protect this resource. In most black markets elsewhere documentation has been the key tool utilized for eliminating the black markets.

Allocation: For the most part as commercial catches have dwindled to nothing, the allocation division may be between legal subsistence fishermen, and those who are providing the fish for a commercial black market in Yukon Chinook salmon.

Allocations and harvest rights and priorities only matter as long ... as there is a healthy resource. When you protect the resource, you are in essence protecting the harvest rights of all.

For the record, I am the plant manager of the fish processing plant in Kaltag, where for the last four years, we have been voluntarily returning all commercial Chinook salmon back into the river to spawn.

A black market in Yukon Chinook salmon is unacceptable, and clearly previous attempts have fallen short, otherwise we would not have a black market that is "widespread" and "rampant". There may be other solutions than my own. Rest assured, that I would support any and all solutions that will eliminate a black market in Yukon salmon.

Black markets in fisheries products have long history of eventually decimated the resource.

Sincerely,

Doug Karlberg

Doug Karlberg

PO Box 4397
Bellingham, WA 98227
Ph. 360.961.2618