

Guysborough County Inshore  
Fishermen's Association  
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In response to the consultation document, “The Future of Canada’s Commercial Fisheries”, and questions posed from that document, GCIFA have some very strong concerns and some suggestions as well as support for some of the proposed policies. We have some comments on the method or process of consultation and the proposed document of “What We Heard” as the dissemination method.

### **Background**

GCIFA is a not-for-profit harvester organization that represents 400+ small boat owner operators and crewpersons as well as an offshore snow crab, tuna, groundfish and shrimp vessels. These members are all multi- species owner operators. The fishery in Guysborough County is the primary contributor to the GDP and the primary employer contributing 40 plus million dollars in landed value in 2011 to our coastal community. We take this role and responsibility very seriously as the sustainability and viability of our communities are dependent upon us for survival.

### **Response to Commercial Fisheries Modernization**

After reading through and carefully examining and discussing the possible meaning and implications of the policies, GCIFA’s main concern is the total ignorance and we feel blatant neglect of the Owner Operator and Fleet Separation policies. There is absolutely no mention of these vital policies that industry has demanded be upheld and strengthened in the consultations on the AFPR in 2004, and also what you as DFO have recorded in your “What We Heard” document from these very successful consultations. We received the copy of “What You Heard” then, less than five years ago and it appears you have forgotten it already. We would need to see in writing and in DFO’s management actions that these two vital policies will remain the backbone of Modernization of the Fisheries. Our coastal communities depend on the resource being harvested and processed in the communities and the revenues remaining there, as that is who “we” are accountable to, in managing these resources. Who in Ottawa and what right do they have to say that our coastal communities should not exist or create policy that excludes our voice and our access to the resource that we are dependent upon for our sustainability and survival.

If DFO does not actively and openly support these two policies than how can we, as the most affected stakeholders, trust DFO to uphold, implement or enforce these new

proposed policies for the good of the resource. We do not think that it is in Canada's or our industry's best interest for a stock broker in downtown Toronto to own and control our fisheries resource, although we do concede he should have an opportunity to voice his opinions on how the resource is managed for all Canadians.

### **Global and Domestic Issues**

The global and domestic challenges can still be discussed and addressed or responded to without stacking all of the licenses on one large vessel, owned by a corporation who answers to shareholders with no invested interest in coastal communities or sustainable resources. This type of owner could easily collapse the resource and buy shares in a strip mine in Alberta. On paper the industry will still export the 4.9 billion for Canada but who will be the benefactors of this resource?

The harvesters support a Canadian Brand and have actually been opening asking for this for a very long time, as a statement to our sustainable managed fisheries. Why are we not bragging about our responsible fishing practices and our new management policies? We have had IFMP for most of our fisheries on the East coast of Canada for quite a few years now – they are not new to us. Science based quota systems such as the ENS snow crab and Scotian shelf shrimp fisheries are very vibrant and sustainable addressing by-catch and SARA as well ecosystem foot printing in our harvesting rules. Why are we not presenting this by way of a Canadian Brand and the whole issue of traceability would and could be solved by this as well? Trace it back to the boat if you have to or as far as what make sense for the consumer and the industry. Why would you leave something so important to a third party “retail marketing tool” to set standards that could be accepted globally? Canada has a very positive and trustworthy reputation on the global food market so why are we not promoting this through a brand. Mad cow disease or Listeria can be traced back to the cow on any farm or back to a piece of equipment in any food factory why shouldn't we be able to trace our fish product in times of question or inquirers? We should already have that in a 4.9 billion dollar export industry in Canada.

As for third party eco-labeling, industry was very open to this process when it was presented as a sustainability and traceability process that would satisfy global and domestic demands for certification. Unfortunately the main eco-certification has been used and is developing as a retail marketing tool, which we feel may jeopardize its effectiveness as a sustainability certification. One of our main certifiers is perceived by industry and our environmental stakeholders *as a pay as you go certification* that any fishery can obtain as long as they are willing to pay the hundreds of thousands of dollars for the assessments and subsequent reviews. This is so very obvious in some of the questionable fisheries that have been certified and the conditions set for continued certifications. When this retail marketing tool no longer gives an edge to the retailer they will drop it for some other “tool” and we feel this needs to be strengthened or the sustainability of any fishery could be adversely affected. That is not to say that industry does not support eco-certifications or labels but we had better be very careful in choosing

our third party managers and allowing them to develop policy for the new fisheries management.

As far as aquaculture based food sources we do not feel we need to compete with this sector as consumption of all seafood is increasing daily with the global population increase. As long as both sectors provide a quality, sustainable and safe food product there is a demand neither of our sectors can keep up with. Aquaculture, as a sector, is responding to the same global issue as the live capture fisheries but the largest new markets are in Asia and this culture is responding to fresh wild capture product thus far.

Industry has also responded to global marketing issues for the fisheries of Canada in other ways. We have made some serious positive steps towards developing a marketing council for all Canadian lobster, where all sectors of the lobster industry and government sit at one table. This table combines financial and human resources to develop a marketing plan, traceability plan as well as a quality grading system to ensure Canada's place in a global market for lobster. This includes processed and live market planning and grading. Once this is firmly established and shown to be effective, it would make sense for the rest of the fishing industry to follow a similar process for marketing, traceability and branding. We as harvesters are helping to developing this and would support policy that would see DFO supporting and enhancing the Lobster Council of Canada.

### **New Policies and Support for Existing Ones**

The harvesting sector has responded and continues to respond to domestic drivers. We have participated in the development of IFMP's for 90% of our fisheries on the East Coast as well as science based quota management systems with a Precautionary Approach component for all fisheries, based on science advised reference points for responding to changes in the health of the resource. Yes we support these policies and are already managing with them so let's get on with expanding this to the fisheries that are not using this program. Is DFO prepared to support these policies and uphold the PA's when politics or economics demand that you ignore science advice for the good of the resource?

If we are in a science based ecosystem management regime then financial support for science must be a top priority to DFO and as industry partners we cannot stress this enough. This seemed like a very sensible plan when we could take fish for science. This is no time to cut science budgets when domestic and global markets and stakeholders are demanding we manage science based. We are a bit skeptical that this will happen as we already see the science bar set so low, bankruptcy for most fishing enterprises will happen long before we ever have to respond to a reference point in most of our PA's. We support the policies to better record and control by-catch but would like to see some strong wording on a clear definition of by-catch, discard and *live releases* associated with each fishery, as a means of education to the public that all by-catch is not dead and dumped. If we go with evergreen science assessment and management plans then when the time comes to renew we do not want to be without data sets and knowledge to

contribute to the next five year science and management plan or a sustainability or traceability certification.

Integrated fisheries management is not new to the east coast of Canada as we were one of the first groups at the ESSIM table and have been there for more than ten years. This is a perfect example of DFO and multi - stakeholder policy being suggested, developed and agreed upon that cost many human and financial resources to develop with multi- stakeholder support and then DFO drops the ball and says “we can’t sign off on that plan”. The Minister of the day requested that we develop this plan and then adopt the action plan and actually try an integrated management regime but from what we can tell politics derailed this effort and not fishing industry politics. You can see how we may be skeptical of new policies. What are you really asking us to do with this New Modernization of the fisheries?

## **The Process**

This brings us to our last concern and comment. We are very fortunate as a harvester association to have engaged and informed fishermen and a staff person to assist in formulating a response to this document and even more fortunate to have fishermen who have taken the time and have the capacity to try and decipher what it is you are asking industry to respond to. The problem is not enough of the industry has this capacity. DFO is aware of this but we see they have made no effort to engage a very large majority of the industry, in a response to what we think you are asking in this document. We wonder why this is – and maybe a bit skeptical of DFO intentions but transparency is something you mention in the document that you need some work on. As far as going online to answer the three very vague and some would say leading questions, most harvesters are not going to go online to participate or even know that they can or should.

Of those who have reviewed the questions there are many comments on the clarity of the questions and they feel their responses are already determined by the leading questions. To ask industry if we support these new policies when most of them have already been developed, implemented and supported by industry confuses us as to what are you really asking or “why ask now”? DFO has already implemented these policies and we are already using these tools to manage responsibly. Who is really asking for this change in the way we manage and to what end? Are you asking us do we want or support quotas in our lobster fishery so one large vessel can fish it all? Do we want to be able to stack 10 lobster licenses on one boat? Should a stockbroker own 10 licenses that have no interest in the sustainability of our resource or our coastal communities? Should one vessel be permitted to access the whole quota for 4VSW or 3P redbfish; or fish the resource from inshore to offshore and everything in between? If you are asking us those questions why not just ask them straight out in clear English in your transparent and accountable new method that you are proposing. Those types of questions can be

answered and would be answered by a very large majority of stakeholders if DFO was interested in a response!

We would suggest that more public consultation be permitted and a greater effort by DFO to reach a wider industry participation. When you write the "What We Heard" be very clear in the report as to "What You Asked" so the greater public audience is aware what our response was actually to and for what purpose as well as "who" you actually heard it from.

Sincerely GCIFA  
President Eugene O'Leary for the membership