

**UNITED FISHERMEN AND ALLIED WORKERS' UNION-CAW**  
**Response to**  
**The Future of Canada's Commercial Fisheries**

The United Fishermen and Allied Workers' Union-CAW (UFAWU-CAW) remains the only organization in British Columbia to represent shoreworkers and fishermen in nearly all the commercial fisheries on the west coast. As such, we have been intensely aware and often critical of the DFO's changes in direction over at least the last forty years. Unfortunately many negative outcomes of policy that we have predicted have come true.

It is extremely regrettable that we are once again faced with a new direction which on its face will be a disaster for not only our members but those who currently live and work in communities tied to the fishing industry. In addition, there is much in this new direction that bodes ill for the long term health of the resource.

We recognize the international and domestic drivers for change referenced in the document. It is a tougher world in the marketplace than it used to be for our industry. However, lest we forget, in the salmon fishery area licensing immediately increased costs for fishermen unless they were content with less access to fish. Lack of support for salmon enhancement, habitat protection and rehabilitation has decreased catches and opportunities to fish. In salmon and other fisheries, reallocations to recreational and other fisheries have reduced access and decreased revenue. In those fisheries with ITQs, exorbitant lease costs cut heavily into the working fishermen's earnings whether he is working on deck or a license holder and vessel owner.

Long term planning is something every business person wants to be able to rely on. The last few years have shown us that it is not always possible. While evergreen IFMPs may apply to some fisheries, the value of yearly consultations based on sound science and the experience of those who are actually out on the grounds seems to be necessary in most West Coast fisheries. In particular the effects of global warming may already be appearing and one would hate to discount it as a factor that could change fish patterns in the very near future.

Stability in allocations would indeed be a wonderful thing. That doesn't appear to be the case at present given the recent reallocation by the Minister to the recreational sector of another 3% of the halibut TAC. Indeed this quota was transferred from the most highly regulated fishery in BC to a fishery spread widely over the coast with little validation and enforcement. If, as the document suggests, resource users will negotiate allocation changes amongst themselves, we can only surmise the department is firmly committed to ITQs in an integrated fishery.

Given the continuous mantra of doing more with less, money that is, we are hard put to understand how the necessary science can be done to establish precautionary approach frameworks. It is our hope that the wherewithal can be found to keep stock status reports current and ecological risk levels are set only after proper scientific evaluation.

When did it become fashionable to champion the cause of the less rules the better? Granted, the fishery on our coast may seem unnecessarily complicated and there may indeed be rules that are outdated, but moving to a market based, resource owner management structure leaves behind the small boat fleet, coastal communities and any harvesters who don't have deep pockets.

Already the ITQ scheme in trawl and halibut is leading to what many would consider extreme corporate concentration. There are no new entrants and the mantra is go big or go home. There are no rules around processor control of quota and it is for sale to the highest bidder anywhere around the world. In no time at all some fisheries will be owned by two or three large interests. Increasingly fishing communities are shut out of the picture. Those who own quota harvested in any area will make the decisions and they will be far fewer and further removed from the active fishermen and communities.

We do of course support conservation and sustainable fisheries. Working fishermen have often been those who are most aware of conservation needs. We trust we can rely on DFO's commitment to ecosystem based management in this area. After all, people who live and work in fishing communities are a living breathing part of the ecosystem too.

It is unfortunate that we are left with the overall impression that this new policy directive is somehow driven from the top of the department down to those who must actually try to make a living off the fisheries. We have been reminded of the striking similarities with the recommendations of the salmon document "Treaties and Transitions" by Pearse/McRae.

Therefore we would like to offer some recommendations of our own as follows:

- The interests of working fishermen and their communities will be vital in determining any policy around the future of Canada's commercial fishery and any policy change needs to show them how the policy makes them more prosperous and sustainable.
- All policy changes need to reflect each fishery and area's needs. There really is no "one size fits all."
- Consultation needs to be more on the face to face level with fishermen and those in the community who derive their livelihood from the industry in each area.
- Market driven solutions and quota transfers which reward only a quota holder and increase costs to working fishermen can not be supported.
- Any transferable quota system must be open, transparent and easily examined by the real owners of the fish—the Canadian public. Citizens need to know that their ocean resources can and are being sold to the highest bidder anywhere in the world.
- The government of Canada cannot continue to underfund the DFO. The resource and the industry require sufficient money for real and consistent consultation, science, monitoring and enforcement.

- Given the reality of climate change, extreme caution must be used when determining which fisheries, if any, can be managed using evergreen plans.

All of which is respectfully submitted by:

United Fishermen and Allied Workers' Union-CAW

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